

[REDACTED]

From: [REDACTED]
Sent: 16 December 2024 12:27
To: Thomas, Kane
Cc: LDP - For Enquiries
Subject: RE: Deposit LDP 2 Representations - 4 x WWA Sites

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.*

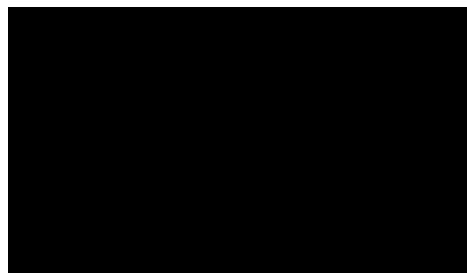
Hi Kane,

Here are new WeTransfer links to the supporting information for the four sites.

1. Land adjacent to Bro'r Dderwen, Clunderwen, Pembrokeshire, SA66 7NE
<https://we.tl/t-LImZVWAhxx>
2. Land at Nant Y Ffynnon, Letterston, Pembrokeshire, SA62 5SX
<https://we.tl/t-tA1IVX7MIA>
3. Land at Golwg Y Llan, Eglwysrwrw, Crymych, Pembrokeshire, SA41, 3UP
<https://we.tl/t-eBLes7BIqB>
4. Land adjacent to Maes Merydd, Llandissilio, SA66 7TG
<https://we.tl/t-yfQ6EUujMQ>

Thanks,

Mike



Subject: Deposit LDP 2 Representations - 4 x WWA Sites

Morning Kane,

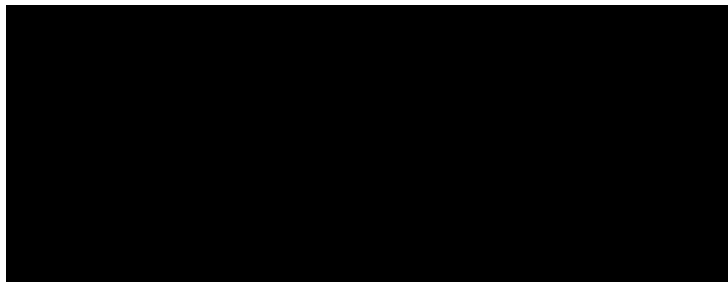
I hope you are well.

Last Friday we submitted representations on behalf of Wales & West HA for the following 4 sites that we have discussed in recent weeks. I'm conscious all the supporting documents were included on individual WeTransfer links but there is only a fairly short window to download the information. Could you let me know if you can access the links ok and have managed to download the documents or whether you need fresh links?

1. Land adjacent to Bro'r Dderwen, Clunderwen, Pembrokeshire, SA66 7NE
2. Land at Nant Y Ffynnon, Letterston, Pembrokeshire, SA62 5SX
3. Land at Golwg Y Llan, Eglwysrw, Crymym, Pembrokeshire, SA41, 3UP
4. Land adjacent to Maes Merydd, Llandissilio, SA66 7TG

Thanks,

Mike





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		Michael Southall
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		Amity Planning (on behalf of Wales & West Housing Association)
Cyfeiriad Address		Suite 212, Creative Quarter, Cardiff. CF10 1AF
Rhif ffôn Telephone no		REDACTED
E-bost Email address		REDACTED
Llofnodwyd (gallwch teipio) Signed (can be typed)	Michael Southall	
Dyddiad	13/12/2024	



Date		
RHAN B: Eich sylw		
PART B: Your representation		
Eich enw / sefydliad Your name / organisation		Wales & West Housing Association
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 SP7 (Settlement Boundaries) GN16 (Residential Allocations)
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)		Page 50, Paragraph 4.32 Pages 124-130, Paragraphs 5.102-5.105
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)		Proposal Map (PM09) Letterston (Inset Index Map 55)
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.		No specific document.
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.		
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

X

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

This is proposed as an alternative site allocation.

The site is known as:

'Land at Nant Y Ffynnon, Letterston, Pembrokeshire, SA62 5SX'

Cyfeiriad y cais

Site reference

N/A

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.

This representation is accompanied by the following drawings and documents:

- Site Representation Statement (240098SRS-01)
- Site Location Plan and Context Plan (R521 - SK-20)
- Site Constraints Plan (R521-SK-25)
- Concept Site Plan (R521-SK-28A)
- SWOT Analysis Plan (R521-SK-24)
- Key Points Plan (R521 - SK-21)
- Agricultural Land Classification Survey (December 2024)
- Landscape Character & Visual Impact Assessment (TDA3015LC&VIARhC11.24)
- Ecology Report Update (1963 002)
- Transport Statement
- Sustainability Appraisal (December 2024 – Rev 2)

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.

x

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').

We would be grateful to reserve the right to participate at the relevant hearing session(s).

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.

Site Representation Statement

Land at Nant Y Ffynnon, Letterston,
Pembrokeshire, SA62 5SX

December 2024

Document Reference: 240098SRS-01



Contents

1. Introduction	4
Client	4
Purpose	4
Statement Structure	4
Supporting Information	4
2. The Site: Location, Extent & Rationale	5
Site Address	5
Site Location	5
Site Description	5
Existing Use	5
Proposed Use	6
Land Ownership	6
Planning History	6
Rationale for Housing Allocation	6
3. Opportunities & Constraints	7
Planning Constraints	7
Utilities	8
Water Connection	8
Drainage	8
4. Environmental Considerations	9
Is the site located within or adjacent to a mineral buffer zone?	9
Is the site located within a Mineral Safeguarding Area?	9
Is the site within or immediately adjacent to an AQMA?	9
Does the site contain high carbon soil e.g., peatlands?	9
Does the site contain high quality agricultural land (grade 1, 2, 3a)?	9
Is the site located within or immediately adjacent to any RIGs?	9
Is the site within or adjacent to a phosphate sensitive SAC catchment?	9
5. Analysis Of Second Deposit Plan LDP 2 Housing Allocations	10
HSG/053/LDP2/1 (Letterston)	10
Housing Commitment 053/00009 (Letterston)	10
HSG/149/LDP2/1 (Wolf's Castle)	11
HSG/120/00018 (Spittal)	11
6. Site Assessment	11
Principle of Development	11

Visual & Landscape Impact

Welsh Language

Highways Safety and Movement.....

Ecology

Viability and Deliverability

7. Conclusion.....

12

13

13

13

15

15

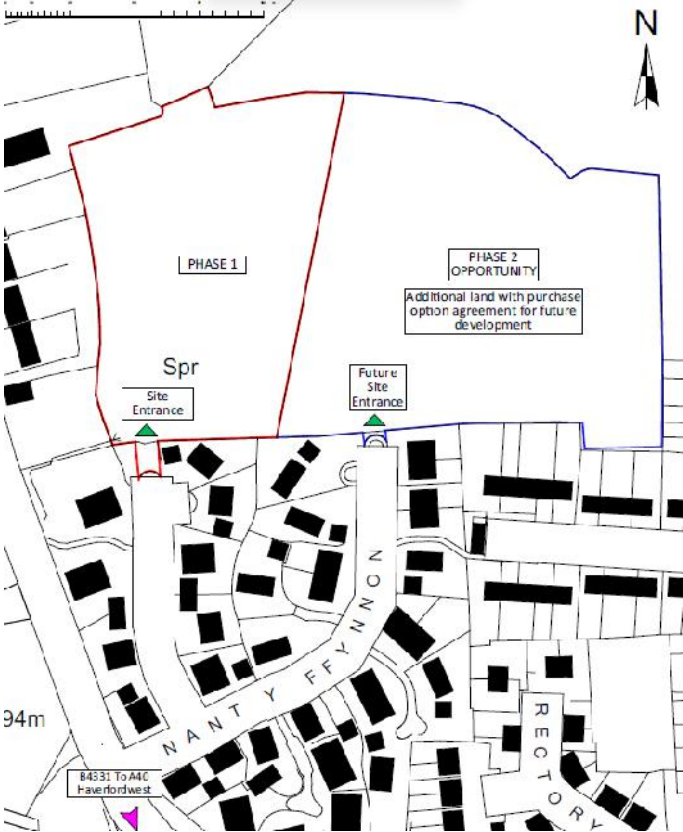
Figures

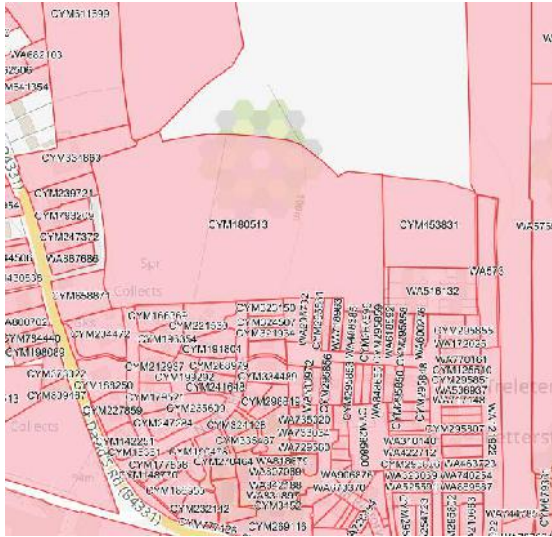
- Figure 1: Site location Plan
- Figure 2: Extract from Land Registry Map Search
- Figure 3: Extract from second Deposit Local Development Plan 2 (2017 – 2033) Proposals Map
- Figure 4: Extract from NRW Flood Map for Planning
- Figure 5: Extract from Historic Wales Map
- Figure 6: Compliance Assessment of Welsh River SACs against Phosphorus Targets (Source: Data Map Wales)

Appendices

- Appendix 1: Illustrative Site Layout Plan/Masterplan

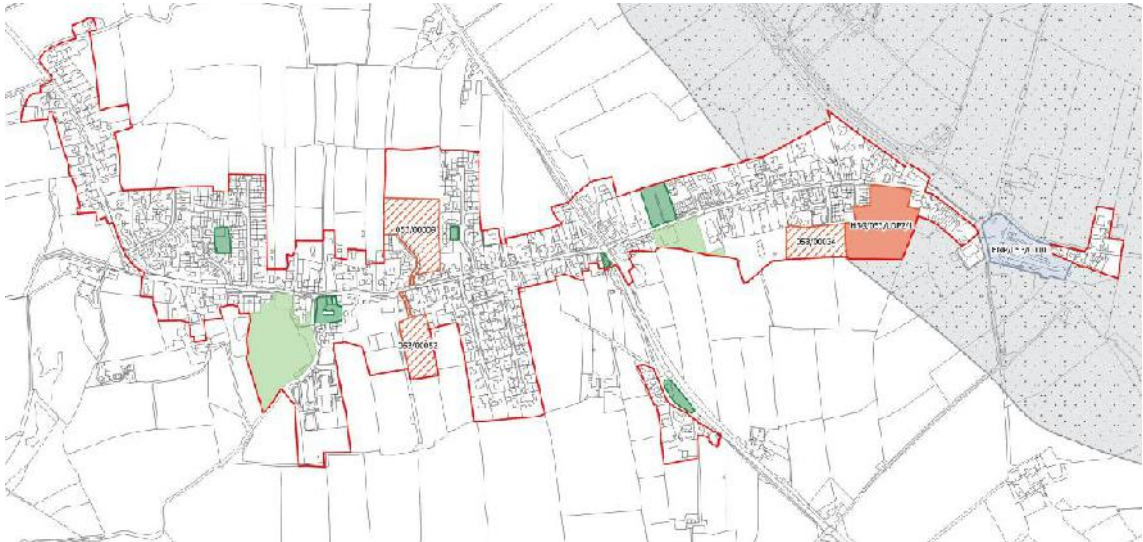
1. Introduction	
Client	Wales & West Housing Association (WWHA)
Purpose	<p>This statement has been prepared, on behalf of WWHA, in response to the statutory consultation being carried out by Pembrokeshire County Council (PCC) in respect of the second Deposit Local Development Plan (LDP) 2 2017 – 20233 (hereafter ‘the Plan’).</p> <p>This consultation provides an opportunity to suggest different sites or changes to boundaries to those included in the second Deposit Plan. Accordingly, WWHA hereby submit the land at Nant Y Ffynnon in Letterston as an ‘alternative site’ to be developed for residential purposes.</p> <p>The site subject to this representation has not previously been submitted to the Council for consideration in conjunction with the Plan preparation process and has not been identified in the Deposit Plan 2 as one for development purposes. It is on this basis we propose this ‘alternative site’ as an objection to the Plan, since it is unsound in its current form on the grounds it will under-deliver housing (i.e. Test 3: Will the plan deliver?).</p>
Statement Structure	<p>This statement seeks to demonstrate the acceptability of the proposed alternative site for residential purposes in the context of relevant planning policy, taking into account the context of the site and the surrounding forms of development. The remainder of the statement is, therefore, structured as follows:</p> <ul style="list-style-type: none"> ▪ Section 2 provides an explanation of the context of the site, including site details and a description of the proposals; ▪ Section 3 sets out the site’s opportunities and constraints; ▪ Section 4 provides commentary on the site’s environmental considerations; ▪ Section 5 analyses the deliverability of those proposed housing allocations within WWHA’s catchment area; ▪ Section 6 considers the primary planning matters applicable to the residential development of the site; ▪ Section 7 provides an overview and concludes the statement.
Supporting Information	<p>In addition to this statement, this representation is supported by the following plans and technical reports:</p> <p><u>Plans</u></p> <ul style="list-style-type: none"> ▪ Site Location Plan and Context Plan (R521 - SK-20) ▪ Site Constraints Plan (R521-SK-25) ▪ Concept Site Plan (R521-SK-28A) ▪ SWOT Analysis Plan (R521-SK-24) ▪ Key Points Plan (R521 - SK-21) <p><u>Technical Assessments & Documents</u></p> <ul style="list-style-type: none"> ▪ Deposit LDP 2 Representations Form ▪ Agricultural Land Classification Survey (December 2024) ▪ Landscape Character & Visual Impact Assessment (TDA3015LC&VIARhC11.24) ▪ Ecology Report Update (1963 002) ▪ Transport Statement (1827-ACS-ZZ-XX-RP-T-001-A) ▪ Sustainability Appraisal (December 2024 – Rev 2)

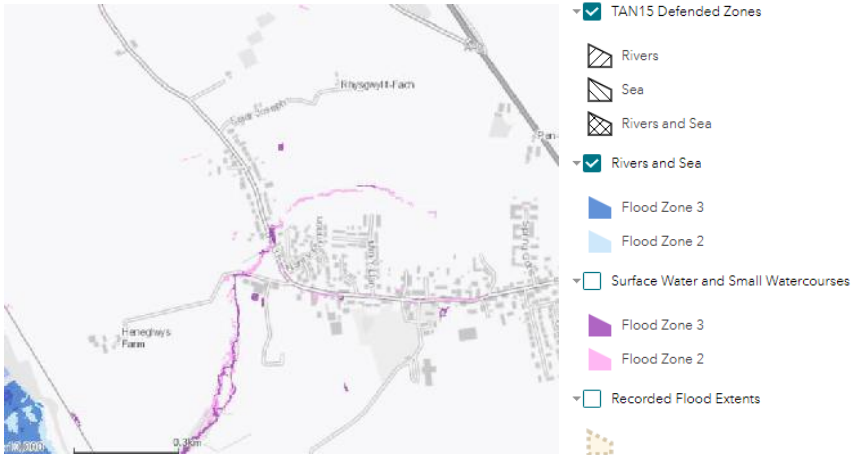
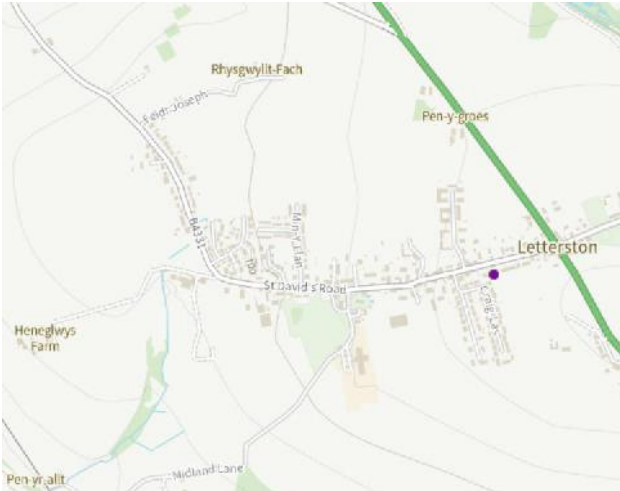
2. The Site: Location, Extent & Rationale	
Site Address	Land at Nant Y Ffynnon, Letterston, Pembrokeshire, SA62 5SX.
Site Location	<div>The extent and location of the site is shown on the site location plan below.</div> <div></div> <div>Figure 1: Site Location Plan</div>
Site Description	<div>The site (Phase 1 and Phase 2) is a broadly rectangular area of land immediately adjoining Letterston. The Phase 1 land measures 1.08 hectares (2.6 acres) and the Phase 2 land is 1.62 hectares (4 acres), giving a total area 2.7 hectares (6.6 acres).</div> <div>The overall site comprises agricultural land located to the rear of those dwellings that front onto St David’s Road (B4331). The entire site constitutes greenfield land that is devoid of buildings and comprises two grassland fields defined by mixed native hedgebanks.</div> <div>Existing residential development is located to the east, south and a portion of the western boundary. The northern and part of the eastern boundary abut agricultural land.</div> <div>Topographically the site slopes gently from east to west.</div> <div>The full length of the site’s western and southern boundaries abut the settlement limits, as defined by the Proposals Map accompanying the adopted LDP and the second Deposit LDP.</div> <div>The two land parcels are proposed to be access separately by extending the turning heads of the estate roads serving Nant Y Ffynnon.</div> <div>The immediate character of the area is residential, although the village benefits from a church, convenience store and nursery (amongst other services and facilities).</div>
Existing Use	Agricultural land.

Proposed Use	<p>It is proposed to develop the site for residential purposes (Use Class C3).</p> <p>It is anticipated this will comprise a mix of open market and general needs affordable homes.</p> <p>The site is split into two phases. Phase 1 measures 1.08 hectares and Phase 2 is 1.62 hectares. An illustrative site layout plan has been prepared in support of this representation to provide an indication of how the site could be developed with residential dwellings. This layout/masterplan demonstrates how 22 dwellings (20 dwellings per hectare) could be provided on the Phase 1 land, together with open space provision, ecology buffers and Sustainable urban Drainage Systems (SuDS). The layout is included at Appendix 1 of this statement. The Phase 2 land has the potential to deliver around 40 dwellings.</p> <p>Since the Site Promoter is WWAHA, it would not be appropriate for land to be identified in the Plan as a self-build/custom build site for housing.</p> <p>WWAHA recently obtained planning permission for a 92-unit scheme on an allocated housing site in Narbeth known as ‘land west of Bloomfield Gardens and north of Adams Drive and Highfield Park’. It is proposed to bring forward this alternative site in the same manner as the Bloomfield site; offering a mixed tenure scheme, inclusive of WWAHA’s bespoke Low Cost Home Ownership (LCHO) dwellings.</p> <p>WWAHA may be open to discussion about the site being identified for 100% affordable housing. This will likely be determined based on the housing need in the area at the time of delivery.</p>
Land Ownership	<p>The entirety of the site forms part of a wider land holding covered under one title deed (CYM180513). WWAHA has entered into discussion with the landowner to purchase the site and terms have been agreed, subject to planning permission being obtained.</p> <p>The Phase 1 land would be access from the western Nant Y Ffynnon turning head. The Phase 2 land would be accessed from the eastern Nant Y Ffynnon turning head. Both roads form part of the adopted highway and abut the site. As such, there is no ransom strip that may otherwise affect the deliverability and viability of the either land parcel.</p>  <p style="text-align: right;"><i>Figure 2: Extract from Land Registry Map Search</i></p>
Planning History	<p>Based on the Council’s online planning history records, there have been no previous planning applications at the site.</p> <p>WWAHA submitted a pre-application enquiry (LPA Reference PR/0008/20) to the Council in April 2020 in respect of Phase 1 of the proposed development as a rural exception site. The Phase 2 land was indicated as a later development parcel. A written response was provided by the Council on 28 August 2020 accepting the principle of residential development.</p>
Rationale for Housing Allocation	<p>The Deposit Plan 2 sets out a housing requirement of 5,840 dwellings over the Plan period (i.e. 2017 - 2033). This equates to 365 dwellings per annum.</p> <p>Whilst the emerging Plan makes provision for 6,425 dwellings, which includes a 10% flexibility allowance, based on the analysis of housing delivery reported in the Annual Monitoring</p>

	<p>Reports (AMRs) over the first six years of the emerging Plan period (i.e. 2017 to April 2023), there has been an under-delivery of 336 dwellings per annum. Accordingly, the housing requirement has been adjusted to 382 dwellings for the remaining 10 years of the Plan period (i.e. April 2023 to 2033).</p> <p>The Deposit Plan 2 suggests new homes will be developed mainly on land allocated specifically for housing and in sustainable locations within defined settlement boundaries. However, many of the proposed allocated sites are based on historic allocations that have been rolled-on from the adopted LDP and later historic Plans. It is evident that key housing sites are not being delivered as anticipated, which suggests the need for additional site allocations.</p> <p>The proposed alternative site, subject to this representation, is located adjacent to the settlement boundary and is served by existing infrastructure. The site presents a sustainable, realistic and deliverable opportunity to provide much-needed new homes in Pembrokeshire. The proposals have the ability to comply will all aspects of planning policy and will not result in any detrimental environmental impacts that cannot be mitigated for. It is on this basis this representation has been prepared, which demonstrates there is clear justification for securing the allocation of this land in the LDP 2 for housing purposes.</p>
--	---

3. Opportunities & Constraints

Planning Constraints	<p>The site falls outside of the settlement boundary for Letterston and is not allocated for any specific land use purpose, as defined by the proposals map which accompanies the second Deposit LDP 2 (2017 – 2033).</p>  <p>Figure 3: Extract from second Deposit Local Development Plan 2 (2017 -2033) Proposals Map</p> <p>The site is not covered by any statutory or non-statutory ecological or landscape designations. However, it is greenfield and the peripheries of the land parcels that comprise the site are marked by hedgerows interspersed with trees.</p> <p>Under the current Technical Advice Note 15 (Development & Flood Risk) (July 2004), the site falls within Zone A (i.e. considered to be at little or no risk of fluvial or coastal/tidal flooding), as defined on the Development Advice Map (DAM). Under the revised TAN 15 (currently suspended due to further consultation) Flood Map for Planning, the site falls outside of an area at risk of flooding from rivers or seas. It is, however, within Flood Zone 2, being at risk of flooding from surface water and small watercourses.</p>
----------------------	--

	<div></div> <p><i>Figure 4: Extract from NRW Flood Map for Planning</i></p> <p>In terms of heritage features, there are no listed buildings or Scheduled Ancient Monuments (SAMs) on the site and it does not fall within a conservation area. The closest heritage feature is the Saron Baptist Chapel (Grade II listed), which is located 600m to the southeast of the site fronting the main road (B4331). This is divided from the site by the existing built form in Letterston.</p> <p>The site does not fall within an archaeologically sensitive area.</p> <div></div> <p><i>Figure 5: Extract from Historic Wales Map</i></p>
Utilities	<p>The proposed housing can be feasibility connected to the existing infrastructure in the area:</p> <ul style="list-style-type: none">▪ Electricity Supply▪ Landline Telephone▪ Broadband▪ Foul Sewerage▪ Water Supply
Water Connection	<p>The proposed housing can be connected to the existing water main located in the St David's Road (B4331) carriageway.</p>
Drainage	<p>Foul water discharges will be conveyed to the existing public sewer located in the St David's Road (B4331) carriageway.</p> <p>It is intended to deal with surface water via a sequential approach in accordance with Part H of the Building Regulations. The last resort would be to discharge surface water to the mains sewerage system, which would need to be sanctioned by Dwr Cymru / Welsh Water. The site offers sufficient potential for the inclusion of Sustainable urban Drainage Systems (SuDS), subject to feasibility.</p>

4. Environmental Considerations

Is the site located within or adjacent to a mineral buffer zone?	No.
Is the site located within a Mineral Safeguarding Area?	No.
Is the site within or immediately adjacent to an AQMA?	The site is not located with a designated Air Quality Management Areas (AQMA), the only such areas within the County being in Haverfordwest and Westgate Hill by Pembroke Castle.
Does the site contain high carbon soil e.g., peatlands?	No.
Does the site contain high quality agricultural land (grade 1, 2, 3a)?	<p>Planning Policy Wales (Edition 12) requires that the Best and Most Versatile (BMV) agricultural land (i.e. Grades 1, 2 and 3A of the Defra Agricultural Land Classification System) should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable.</p> <p>The Welsh Government's Predictive Agricultural Land Classification (ALC) Map (Version 2 - published in 2020) categorises the site as largely subgrade 3b agricultural land, albeit the site's peripheries adjacent to the existing development fall are categorised as 'U' land. The guidance note that accompanies the ALC Map (May 2021) sets out that where land is shown on the predictive map as potentially of Grades 1, 2 and 3a an ALC Survey is required.</p> <p>Accordingly, an ALC Survey has been undertaken and supports this representation. The survey concludes the entire site constitutes subgrade 3b land, which is not BMV. In view of this, the loss of this agricultural land is not significant. Further detail and justification is provided in the accompanying ALC Survey.</p>
Is the site located within or immediately adjacent to any RIGs?	<p>Regionally Important Geological and Geomorphological Sites (RIGS) are locally designated sites of local, regional, and national, importance for geodiversity.</p> <p>These sites may provide cultural, educational, historical and aesthetic resources, and are protected from development as a material consideration through the planning system by the Town and Country Planning Act 1990.</p> <p>The site is not within nor immediately adjacent to any RIGS.</p>
Is the site within or adjacent to a phosphate sensitive SAC catchment?	<p>The map below shows the phosphate sensitive SAC catchment.</p> <p>A permit variation was issued on 26 March 2024 for the Waste water Treatment Works (WwTW) in the area providing a phosphorus backstop limit of 5mg/l. We understand this provides headroom to deal with foul water discharges from proposed site allocations.</p>

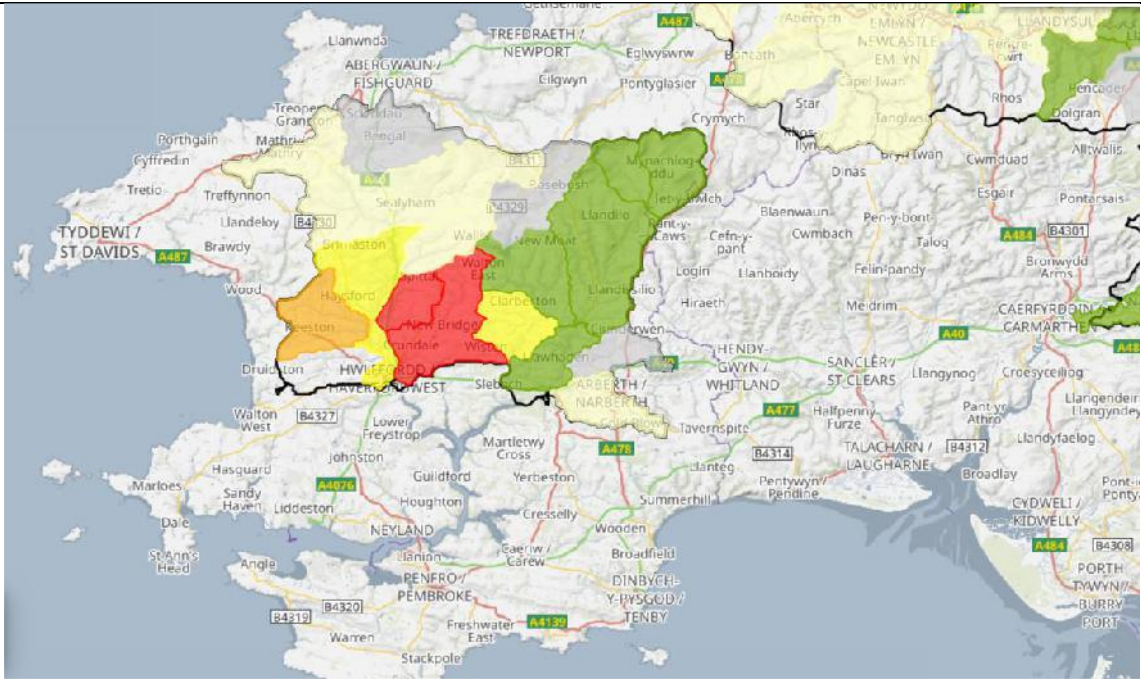
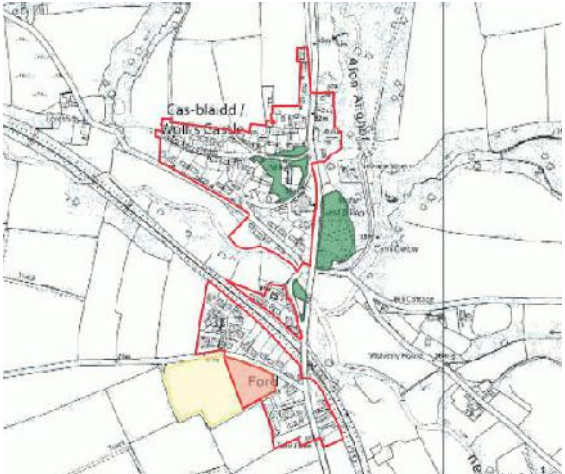
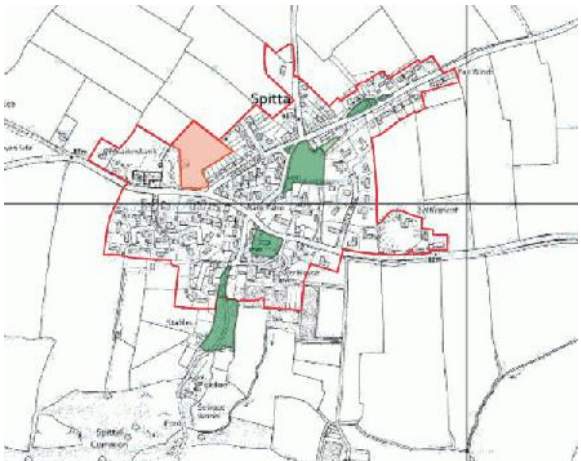


Figure 6: Compliance Assessment of Welsh River SACs against Phosphorus Targets (Source: Data Map Wales)

5. Analysis Of Second Deposit Plan LDP 2 Housing Allocations

HSG/053/LDP2 /1 (Letterston)	<p>‘Land between Longstone Court and 62 St Davis Road’</p> <p>This site forms an extension to the adjacent land which is a housing commitment on the basis it has planning permission for the residential development of 26 houses (LPA Reference 19/1098/PA) and is being delivered by Ateb Housing Group.</p>	
Housing Commitment 053/00009 (Letterston)	<p>‘Court Meadow, Letterston, Haverfordwest, Pembrokeshire, SA62 5SZ’</p> <p>Planning permission for the development of 53 dwellings was granted on this site in May 2011 (LPA Reference 10/0924/PA). Since then the lifetime of the planning permission has been extended and, most recently, a non-material amendment application has been approved to allow changes to the approved scheme under a Section 73 application (LPA Reference 24/03025/PA) – this was granted in October 2024.</p> <p>This is a longstanding commitment with a slow delivery rate. We understand the deliverability of the entire site is questionable during the Plan period because plots are released in a piecemeal fashion.</p>	

<p>HSG/149/LDP2 /1 (Wolf's Castle)</p>	<p>'Land at Ford Farm'</p> <p>This proposed housing allocation is a reduced version of a historic housing allocation from the adopted LDP (Ref: HSG/149/LDP/01) which has failed to be delivered. Deliverability is, therefore, questionable.</p>	
<p>HSG/120/00018 (Spittal)</p>	<p>'Land northwest of Wesley Way'</p> <p>This proposed housing allocation a historic housing allocation that has been transferred from the adopted LDP (Ref: HSG/120/00018) which has failed to be delivered. Deliverability is, therefore, questionable.</p>	

6. Site Assessment

<p>Principle of Development</p>	<p>The alternative site falls outside the settlement boundary for Letterston, but is directly adjacent to it and the curtilages of existing dwellings.</p> <p>The emerging LDP 2 identifies Letterston as a 'service village' (2b), designated in settlement hierarchy under Policy SP6. The matrix accompanying Policy SP6 identifies 'service villages' as being acceptable locations for housing allocations, windfall market housing, local need affordable housing and exception sites for affordable housing. Furthermore, emerging Policy SP9 (service centres and service villages) defines 'service villages' in the County as offering good provision of services and facilities to meet the day-to-day needs of their population. The policy goes on to state that housing allocations for market and affordable housing will be identified in Service Villages, with the precise number for each village varying according to their location, service provision and capacity to accommodate development. The settlement hierarchy and associated definitions contained within emerging policy have been transferred from the adopted policy and clearly accept the principle of housing allocations in and adjacent to this service village.</p> <p>Moreover, the site is not within open countryside and is adjacent to an established settlement; being on the urban fringe, opposite existing dwellings, served by existing infrastructure associated with the surrounding housing development and can be integrated easily into the neighbouring built-up area. The site, therefore, presents a sustainable, realistic and deliverable opportunity to provide much-needed new homes for a specific housing need; representing a</p>
---------------------------------	---

	<p>logical extension of an established and well served key settlement. It is on this basis the site is being promoted for the inclusion as a housing allocation in the LDP 2.</p> <p>A positive pre-application response (LPA Reference PR/0008/20) has been received in respect of the development of the Phase 1 land for residential purposes. Whilst this pre-application enquiry was considered based on the delivery of the site as a rural exception site, the density of the development, layout, design and impact of the proposals on the character of the area were all considered to be acceptable.</p> <p>The key material planning considerations associated with the development of the site for housing purposes are discussed below.</p>
Visual & Landscape Impact	<p>The site is not located within or adjacent to any local or national landscape designations. Nevertheless, given the site is greenfield and the proposals represent an extension to the settlement boundary, a Landscape Character and Visual Impact Assessment (LCVIA) has been prepared by Tirlun Design Associates (TDA) and supports this representation.</p> <p>From a visual and sensory perspective, LANDMAP has located the site within the 'Letterston' aspect area. This aspect area is classified as being of moderate overall value, comprising an undulating agricultural landscape with large villages including Letterston and Scloddau villages and smaller scattered settlements throughout. The area includes small occasional patches of moorland scrub and woodland and contains scattered streams throughout. Raised areas of land offer views out to north/east to Preseli Hills which add to the sense of place.</p> <p>Pembrokeshire County Council has undertaken an extensive landscape character assessment of the County. The results of this study are summarised by the 'Pembrokeshire County Landscape Character Assessment', produced by White Consultants, 2019 (updated 2022). This landscape assessment describes the overall character of Landscape Character Area 5 'Scloddau Lowlands' as an undulating predominantly pastoral landscape with low open hills and small wooded valleys sloping from the Preselis to the east down to the valley floor of the Cleddau to the west. There are larger rural settlements such as Letterston and Scloddau on the busy A40 but smaller scattered settlement elsewhere, especially to the east. The area includes remnant medieval strip fields in places and small occasional patches of moorland scrub and commons to the east.</p> <p>The LCVIA has been produced in accordance with the 'Guidelines for Landscape and Visual Impact Assessment (3rd Edition)' produced by The Landscape Institute and Institute of Environmental Management & Assessment (2013). The significance of the development's impact upon existing views from areas accessible to the public has been assessed using significance criteria for visual impact contained within the 2013 Guidelines. A visual appraisal has been undertaken based on a series of photo viewpoints. This concludes the site is only visible from viewpoint 8 (a short-range view looking northwest from Min y Llan). From here the site is predominantly screened by intervening field boundary hedgerows and existing buildings, although small glimpses of the development may be possible.</p> <p>The LCVIA notes that this viewpoint is short-range and located within close proximity to the site boundary. As such, any visual impact is highly localised. Also, as existing residential properties form part of this view, additional built form will not be out of context, and will not appear visually incongruous. Once the existing native boundary hedgerow enhancements and tree planting are established (2-3 years) as part of the proposed development, it is considered that the slight adverse impact will be reduced to no change. The remaining viewpoints are screened by a combination of intervening topography, existing built form and field boundary hedgerows.</p> <p>The visual appraisal has established the site is only visible from viewpoint 8, the impact from which would be highly localised. Furthermore, it was established that due to views of existing residential properties adjacent to the site, additional built form will not be out of context and</p>

	<p>will not appear visually incongruous. It was also established that once landscape mitigation measures were established, visual and landscape character impacts would be reduced.</p> <p>Overall, the LCVIA concludes the site can accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape in which it is located.</p>
Welsh Language	<p>TAN 20 (Planning and the Welsh Language) seeks to safeguard and promote the interests of the Welsh language through development proposals.</p> <p>In accordance with this policy context, the impact of the proposed residential use of the site on linguistic character of the surrounding area is a material consideration.</p> <p>The development proposal will provide new homes (including the policy compliance level of affordable housing (as a minimum)) in an area where there is an identified need for housing to meet local needs. The provision of new homes will, therefore, enable Welsh speakers to remain in the area. Given the affordable tenants will come from the general locality, it is envisaged they will already use the existing services and facilities in the area (including the local schools). As a matter of course, any signage to be provided within the development will be bilingual. Accordingly, the residential use of the site will not have a detrimental impact upon the needs and intensity of the Welsh language and will, in fact, ensure Welsh speakers can remain in the area.</p>
Highways Safety and Movement	<p>The subject site is located within Letterston within walking distance of all the settlement's services and facilities, which include a primary school, playing field, church, village store and public house. A wider range of services and facilities can be accessed in Fishguard, some 9km to the north.</p> <p>The site is accessible to pedestrians via the existing footways that run along the existing Nant y Ffynnon estate roads. These link to a footway on St David Road's northern side that links the alternative site to most of the village's amenities. The closest bus stops to the candidate site are located on St David's Road, approximately 500m to the east of the site.</p> <p>A Transport Statement has been prepared in support of this representation to consider the means of access to the site, the impact of the proposals on the highway network and the need for active travel measures.</p> <p>It is proposed to access the site by extending the existing Nant y Ffynnon streets, with 5.5m wide carriageways that have 2m wide footways on both sides and turning heads at their ends allowing for the development to be served by adoptable standard estate roads. The access arrangement would comply with current design standards and provide safe means of access to the site for walkers, cyclists and vehicle users.</p> <p>The potential trip generation of the proposed development has been estimated by reference to the TRICS trip rate database. The TRICS data suggests the proposed development will generate around 26 to 31 peak hour vehicle movements. The TS states this volume of traffic will not have a material impact on the operation of the surrounding highway network.</p> <p>Overall, the TS concludes the site is an appropriate location for housing that is safely accessible by all forms of transport. Moreover, the impacts of the development on the continued operation and safety of the surrounding highway network would be acceptable or can be suitably mitigated.</p>
Ecology	<p>The site is not subject to any statutory or local ecological designation. Nevertheless, an Extended Phase 1 Protected Species Survey and walkover survey were carried out in August 2020 in support of the pre-application enquiry for the development of the site. A repeat</p>

	<p>walkover survey was completed in November 2024 to ascertain whether there have been any baseline changes.</p> <p>The results of this survey work are detailed in a report that details a description of the site’s ecological conditions, the ecological context and an appraisal of the site’s ecological value. The content of the report is based on the findings of an Extended Phase 1 Habitat Survey and site inspection.</p> <p>The ecology survey observed the site comprises two improved agricultural fields which have recently been cut for hay. The hedgerows surrounding the site are species rich, but are well maintained as boundary features and are beyond an existing post and wire fence, so out of the proposed development. The only hedgerow to be impacted is the central hedgerow which separates the two fields. There was no evidence of protected species found on the site.</p> <p>The development of the site will inevitably lead to the loss of the improved grassland, therefore any planting should utilise locally sourced, native species in all gardens and landscaping. Hedgerows could be used to demarcate property boundaries as these can also act as natural wildlife corridors. Buffer zones have also been included around the existing hedgerows to protect them in the future.</p> <p>The ecology survey further recommends that:</p> <ul style="list-style-type: none">▪ Any scrubby vegetation or tree removal is restricted to the period between late August and early March in any year to avoid the bird nesting season.▪ All external lighting must be hooded and downward facing and positioned to avoid shining directly onto the features such as woodland edges and hedgerows. The lighting should also be PIR sensitive LED type which have a much more directional lighting range.▪ Hedgerow management recommendations. <p>The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty) requiring Local Authorities to maintain and enhance biodiversity in the exercise of their functions. The residential development of the site can suitably incorporate measures to ensure net enhancement of biodiversity. This could take the form of new native planting and provision of artificial habitats such as bat bricks/boxes.</p>
--	--

Viability and Deliverability

It is our view that the subject site represents a viable and deliverable opportunity for housing purposes that is accessible to key transport routes, adjoins a well-served existing service centre and represents a logical rounding off of this existing and established settlement.

WWHA undertake comprehensive due diligence when site finding. As part of this exercise, viability is tested, factoring in all known costs, revenue, the potential for abnormal costs resulting from site constraints and analysis of market conditions. This exercise has been undertaken in respect of this alternative site, which is determined to represent a viable development proposition. In addition, there is potential for this scheme to obtain Social Housing Grant (SHG), which would support site viability.

The site is not encumbered by any known legal constraints / covenants and WWHA has entered into discussion with the landowner to acquire the site and terms have been agreed to purchase the site, subject to planning permission being obtained.

As such, both land parcels could be delivered within the emerging Plan period and would make a significant contribution to the housing land supply for the County.

It is anticipated that a planning application for the Phase 1 land could be submitted within 6 months of securing sufficient confidence through the LDP process an allocation is forthcoming. Based upon the current LDP timescales, and assuming the LPA would not accept an early application, it is anticipated that a planning application would be submitted in 2026. If the opportunity exists to bring forward an application on the site in advance of this, then the Site Promoter would be happy to consider this.

We have sets out below an indicative delivery schedule for the dwellings proposed on the site.

2026/2027	2027/2028	2028/2029	2029/2030
22 (Phase 1)	-	-	20 (Phase 2)

7. Conclusion

	<p>The evidence prepared and submitted as part of this representation demonstrates there has been an under-delivery of housing within the County over the adopted Plan period, which has continued into the emerging Plan period. It is evident that key housing sites are not being delivered as anticipated, which suggests the need for additional site allocations. We, therefore, object to the Deposit Plan 2 and propose the land at Nant Y Ffynnon in Letterston as an ‘alternative site’, since it has the potential to deliver a viable housing scheme adjacent to an established settlement.</p> <p>The development of the site forms a logical extension, and rounding off, of the settlement and is suitable for housing development; making best and most effective use of this vacant and underutilised site, in a sustainable location, that is suited only to grassland uses due to the size and slope of the parcel, and will deliver economic, social, and a range of community benefits. This is in addition to the provision of affordable housing. Furthermore, the site is capable of being delivered within the Plan period.</p> <p>These considerations provide clear and material justification for the site’s allocation in the LDP 2 for housing development, which will contribute to the performance of the emerging Plan by providing a genuinely sustainable residential development opportunity.</p>
--	---