

Thomas, Kane

From: [REDACTED]
Sent: 16 December 2024 16:27
To: LDP - For Enquiries
Subject: LDP 2 Deposit Plan Representations - Candidate site ref: 154 Land forming north of Park House Court
Attachments: 241216 LDP Deposit Plan 2 Comments Form - ISSUE.pdf; 3124 P400A Location Plan.pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: D Rep

EXTERNAL EMAIL – Exercise care with links and attachments *E-BOST ALLANOL – Byddwch yn ofalus wrth agor dolenni ac atodiadau.*

LDP Team,

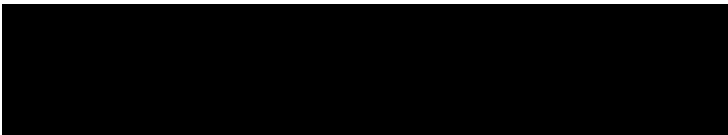
Obo Lidl GB Ltd, please find attached the following representations in respect of the LDP 2 Deposit Plan, principally candidate site ref: 154. Also attached is a Site Location Plan identifying the land in question.

Should you have any queries or require anything further please do not hesitate to contact us.

Thanks

Regards

Rob Mitchell MRTPI
Director



CARNEYSWEENEY

Birmingham Cardiff Exeter London



CarneySweeney proudly supports Prior's Court Foundation as our Partner Charity and we have made a donation in lieu of sending out Christmas cards. Together, we're making a difference through our partnership to transform the lives of autistic young people.

This message contains confidential information and is intended only for the recipient. If you are not the recipient you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version.



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		Rob Mitchell
<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)	Lidl GB Ltd	CarneySweeney
<i>Cyfeiriad</i> Address	c/o Agent	
<i>Rhif ffôn</i> Telephone no		
E-bost Email address		
<i>Llofnodwyd (gallwch teipio)</i> Signed (can be typed)	Rob Mitchell	

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

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



Dyddiad Date	16 December 2024
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RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

Your name / organisation

Lidl GB 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)

Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran

LDP paragraph or section number(s)

LDP Vision and Objectives

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.

Statement of Common Ground 4 (PCC and PCNPA) (2018)

South West Wales Regional Retail Study (2017)

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

X

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

Site forms part of the site ref: North of Park House Court

Cyfeiriad y cais

Site reference

154

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.

These representations relate to land forming candidate site ref: 154, east/north of Park House Court, as shown on the submitted plan (see attached Site Location/Layout Plan) and its promotion for food retail use, in the context of meeting the pressing need for additional food retail provision in Tenby and surrounds.

We welcome the Vision, particularly the aspiration for a strong economy which enables people of all ages to work in the County and for development to be supported by key infrastructure and with good accessibility. We comment on the following Objectives:

1. Objective C – Rural and Urban Economy
2. Objective D – Resourceful Communities
3. Objective I – Access to Goods and Services

Objective C:

Objective C states: *"Sustain and enhance the rural and urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy, and the expansion of Small and Medium Enterprises."*

The proposed use of land at Park House Court for food retail development will help generate jobs (c.40FTE) in the local area and will also include training for employees. This opportunity will boost the local economy and will help to reduce economic/commercial out commuting by providing jobs within the local area and meeting local needs locally.

Objective D:

Objective D states: *"Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services."*

The proposed use of land at Park House Court for food retail development will help to support the existing and growing population of Tenby and surrounds and residential community in proximity of the site, including new development north of Tenby (planning approval ref: NP/23/0458/RES)



Objective I:

Objective I states: *Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.*

The development of land east/north of Park House Court for food retail use offers active travel improvement opportunities that will not only increase accessibility to employment, services and facilities related to the proposed retail development, but also more generally to residents of both Tenby and New Hedges, by completing an active travel route between the two areas, in accordance with the provision of Objective I. See further discussion in our response to Policy SP 20 below.

Notwithstanding the above, it is noted that there is no reference within the Vision and Objectives to the relationship with the Pembrokeshire Coast National Park (PCNP). The Evidence Base includes a Statement of Common Ground 4 (Pembrokeshire County Council (PCC) and PDNP) (2018) and the South West Wales Regional Retail Study (201). Noting the date of these documents and that they were prepared to support the PCNP Local Development Plan 2 (at Submission) and the draft Preferred Strategy of PCC's Replacement Local Development Plan 2 (LDP2). These documents are not considered to be an appropriate/sufficient evidence base to support the Deposit 2 Plan.

The Vision and Objectives should subsequently both be updated to reflect the interrelationship between PCC and PCNP areas and shared development matters, particularly that of retail need, and planning for future development requirements. Greater discussion of which is set out in detail in our response to Policy GN 23 below.

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.



RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

Your name / organisation

Lidl GB 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)

Policy GN 23

SSA/089/LDP2/01 East of Park House, Tenby

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.

SW Wales Regional Retail Study – February 2017

Background Paper for Local Development Plan 2: Retail and Commercial Centres

Retail Survey 2023

Statement of Common Ground 4 (PCC and PDNP) (2018)

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 <u>newydd</u>? Ticiwch <u>bob un</u> sy'n berthnasol. 3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph? Tick <u>all</u> that apply.		
Dyraniad safle newydd New site allocation		X
Polisi newydd New policy		
Paragraff neu destun ategol newydd New paragraph or supporting text		X
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	North of Park House Court / I'r Gogledd Park House Court	
Cyfeiriad y cais Site reference	154	
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.

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These representations relate to land east/north of Park House Court, as shown on the accompanying plan and its promotion for food retail use, in the context of the retail need for Tenby.

Part of the site is proposed for allocation under Policy GN 23 for 'Residential / Nursing facility extension' (site ref: SSA/089/LDP2/01). The site also forms part of a wider parcel of land previously promoted for 'Mixed Use - Housing, Hospital Expansion, Hotel, Food Retail/Pub' (Candidate Site ref: 154 'North of Park House Court'). The Council's assessment of the Candidate Site (as detailed in the Candidate Site Register) concludes *"Retail and commercial uses not justified, and no need established at this site. Part allocated for Specialist and Supported accommodation."*

Retail Evidence Base and Strategy

The South-West Wales Regional Retail Study 2017 (as referred to as 'Retail Study' hereafter) forms part of the Evidence Base for the Deposit 2 Plan. The Retail Study was commissioned in partnership with Pembrokeshire Coast National Park Authority and Ceredigion County Council and provides an evidence base for the retail strategy across the three authorities.

The Statement of Common Ground with PCNP, which forms part of the Evidence Base for the LDP2 Deposit 2 Plan states:

"22. Both Authorities' strategies focus on the need to maintain / create vibrant and diverse town, district and local centres. Both Plan's retail hierarchies are compatible and based on the findings of the South West Wales Regional Retail Study (February 2017) which was commissioned jointly with Ceredigion County Council."

We consider that the use of the Retail Study as the basis of the retail strategy for not only PCC, but also the wider area and specifically Pembrokeshire Coast National Park (PCNP), to be flawed on the following grounds:

- The Study dates from February 2017 and is based on population and expenditure projections



which are now out of date;

- The Study's capacity forecasts assume Pembrokeshire's retail market is in 'equilibrium' i.e. assume existing centres and stores trade in line with 'benchmark' turnover levels which must be assessed; and
- Capacity forecasts are based on market shares remaining in 'equilibrium'. Yet, the Study recognises there is *"potential for market shares to increase as a result of new store openings, which could in the long-term increase forecast capacity."* (para 10.3)

The subject site is subject to a current pre-application enquiry and a planning application (in preparation). This details the high degree of 'leakage' of expenditure from Tenby to better served, competing centres e.g. Pembroke Dock. This is the most up to date evidence of the pressing local retail need for improved local food retail provision in Tenby. The strategy set out in the PCNPA LDP for Tenby is to maintain its position relative to Saundersfoot, St Davids and Newport. Yet, this identified need is not currently planned for in the PCC Deposit LDP.

The retail approach set out in Policy SP16 of the Deposit 2 Plan seeks to protect the established retail hierarchy of the area by focusing development on existing centres and by only permitting out-of-centre retail development where a need and sequential test has been undertaken, in accordance with national policy, to protect the vitality, viability and attractiveness of retail centres. No land allocations for retail use are identified. The subject site is the most sequentially preferable, suitable and available location to meet identified need.

Tenby's Retail Need

Whilst the Retail Study states that, in relation to retail need in Tenby *"there may still be market demand for new foodstore opportunities for key centres, particularly from deep discounters (e.g. Aldi and Lidl) who are planning continued expansion of their store portfolios. There may also be demand for 'local' format foodstores (e.g. Sainsbury's Local, Tesco Express, etc.) within town centre locations."* (para 10.13), it ultimately finds no quantitative need for additional convenience floorspace in Tenby. However, as detailed above, we consider the Retail Study to be wholly out of date and unreliable for planning across the LDP 2 plan period.

It concludes that Tenby and its surrounding settlements are very poorly served in food retail terms. Tenby is principally served by one foodstore which can ably cater for main food shopping (Sainsbury's at Upper Park Road). There is no local limited assortment discount (LAD) foodstore representation – the nearest being Lidl and Aldi in Pembroke Dock over 10 miles away. There is a deficit of local convenience retail provision which can ably serve weekly, main food shopping needs. There is a clear qualitative need for improved local provision in Tenby and its surrounding settlements.

Land east/north of Park House Court

In line with the Welsh Government's 'Town Centre First' approach, a sequential approach has been used to inform the identification of the best location for a new retail development for Tenby.

A search for potential sequentially preferable sites has been undertaken based on a proposed food store of c.1,900 sqm gross, allowing for flexibility. Following a comprehensive search and discussions with officers from Pembrokeshire County Council, land east/north of Park House Court has been identified as the most suitable, available and viable to accommodate a new retail store to meet the needs of Tenby. There are no other suitable, available and viable sequentially preferable



sites available to address this need.

Further details of the Sequential Assessment are set out in the planning application under preparation.

Conclusion

Land east/north of Park House Court has been demonstrated to be required to meet the retail needs of Tenby. This need is not recognised, assessed or addressed in the Deposit 2 Plan because of the deficient retail evidence base provided by the South-West Wales Regional Retail Study 2017.

The allocation of the land under Policy GN 23 for 'Residential / Nursing facility extension' (site ref: SSA/089/LDP2/01) would compromise the effectiveness of the Plan and its ability to meet the retail needs of the National Park and surrounds.

Proposed Change to the LDP

Allocation ref: SSA/089/LDP2/01 under Policy GN 23 should be amended to allow for the deliver of food retail provision for the reasons detailed above.

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



RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

Your name / organisation

Lidl GB 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)

Policy GN32

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.

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2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol.

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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

x

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

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

Enw'r safle

Site name

Cyfeiriad y cais

Site reference

Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Rhestrwch eich sylwadau isod.

Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i



gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/profion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Policy GN32 and its supporting text should be expanded to recognise that additional retail development in Pembrokeshire is required to address the retail needs of settlements beyond the authority boundary. This will ensure that the plan fits with neighbouring policies and requirements. We refer specifically to Pembrokeshire Coast National Park and the need arising from Tenby, with further details on need in our response on Policy GN 23 set out above.

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.



RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

Your name / organisation

Lidl GB 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)

Policy SP16

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 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

Polisi newydd

New policy

Paragraff neu destun ategol newydd

New paragraph or supporting text

x

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.

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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.

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Policy SP 16 and its supporting text should be expanded to recognise that additional retail development in Pembrokeshire is required to address the retail needs of settlements. This will ensure that the plan fits with neighbouring policies and requirements. We refer specifically to Pembrokeshire Coast National Park and the need arising from Tenby, with further details on need in our response on Policy GN 23 set out above.

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.

--



RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

Your name / organisation

Lidl GB 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)

Policy SP20

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.

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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.

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x

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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

x

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).

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Site name

Cyfeiriad y cais

Site reference

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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.

We support Policy SP 20 in supporting development offering an improvement to existing transport infrastructure which increases accessibility to employment, services and facilities, particularly by sustainable means.

The development of land at site allocation ref: 154 east/north of Park House Court for retail use offers active travel improvement opportunities that will not only increase accessibility to employment, services and facilities related to the proposed retail development, but also more generally to residents of both Tenby and New Hedges, by completing an active travel route between the two areas, in accordance with the provision of the policy. The scheme can deliver a stretch of footway/cycleway on the A478, east of Park House Court which is currently not served by a footway. The provision of this length will connect two existing stretches of footway/cycle way and provide a continuous active travel route between Tenby and New Hedges. The delivery of additional retail development locally will counteract the leakage of expenditure and high levels of out commuting to competing centres. It will increase Tenby's self containment. This will save, time, fuel, CO2 emissions and mileage in accordance with overarching sustainability objectives.

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').

Allocation at North of Park House Court / I'r Gogledd Park House Court

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.

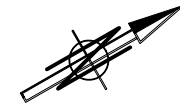
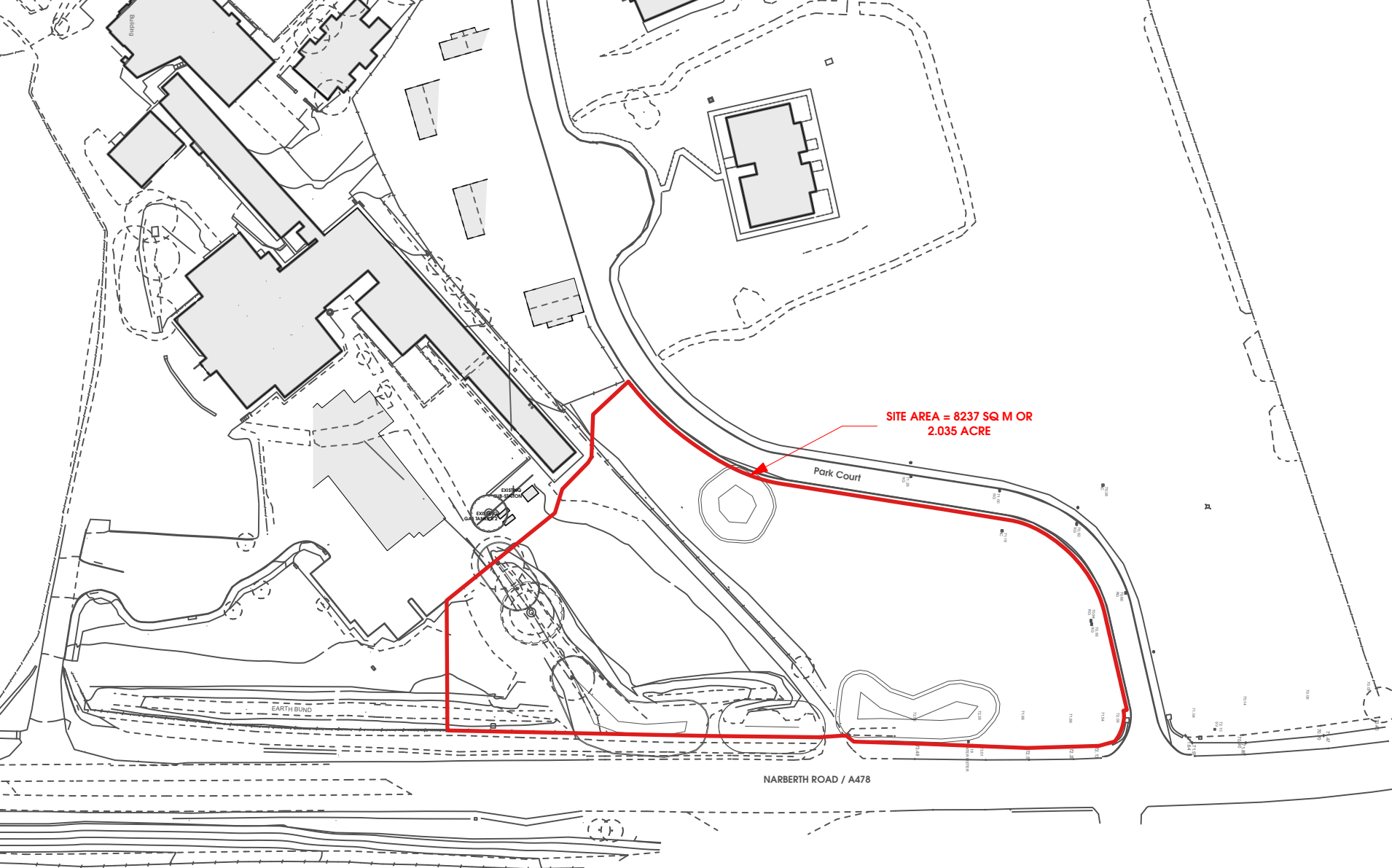


Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.

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.



A 05/12/2024 Title block and street name added				KA
Rev.	Date	Description	Drawn	

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client
Lidl GB Ltd.



project
**Park House Court,
Tenby**

drawing title
Location Plan

date **October 2024**

status **Planning**

scale **1:1250 @ A4**

drawn **NG** checked **BM**

job no. **3124** dwg no. **P400** rev. **A**

