

Thomas, Kane

From: [REDACTED]
Sent: 16 December 2024 16:36
To: LDP - For Enquiries; Evans
Subject: OBJECTION TO EXCLUSION OF LAND FROM ALLOCATED SITE HSG/047/LDP2/1
ALDP 2 DEPOSIT 2 PLAN
Attachments: A1 COL GEN PLAN DEC 2024.pdf; DEC 16 2024 OBJECTION FORM.pdf; OBJECTION
STATEMENT PEMBS LDP2 Dec 2024.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.*

Please find enclosed the necessary documentation in respect of an objection to :

THE EXCLUSION OF AN AREA OF LAND FROM ALLOCATED SITE HSG/047/LDP2/1 AT
JEFFREYSTON - LOCAL DEVELOPMENT PLAN 2 DEPOSIT 2 PLAN (2017- 2033)

The objection comprises three documents :-

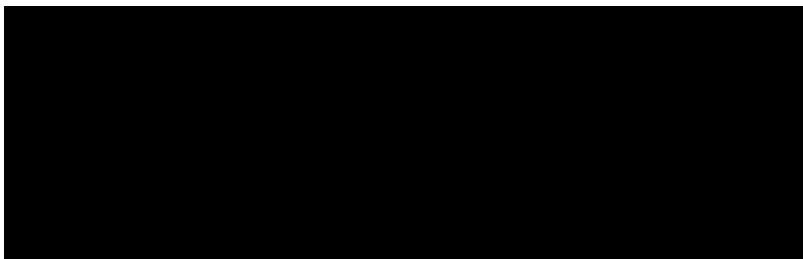
A completed Representation Form
An A1 size location and schematic layout plan
A written statement in support of the objection.

Please advise if you require any further information.

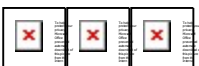
Kind Regards

Craig Jones

Director



Web: www.jcrplanning.com





Hoffem gael eich barn am y Cynllun Datblygu Lleol ac ar ddogfennau sy'n cefnogi'r Cynllun Datblygu Lleol. Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. sylwadau neu wrthwynebiadau) Mae fersiynau nodiadau cyfarwyddyd ar gael o <https://www.sir-benfro.gov.uk/adolygur-cynllun-datblygu-lleol/adneuo>.

Sylwch: **Ni fydd** sylwadau a wneud ar Gynllun Adneuo 2020 yn cael eu symud ymlaen ac mae angen gwneud sylwadau newydd ar y Cynllun Adneuo presennol hwn.

Os ydych yn cyflwyno copi papur, atodwch dudalennauychwanegol lle bod angen. Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Yr Arolygiaeth Gynllunio.

Mae'n rhaid derbyn eich sylwadau erbyn hanner nos Rhagfyr 16eg 2024. Dychwelwch ffurflenni at: ldp@pembrokeshire.gov.uk neu
Y Tîm Cynlluniau Datblygu, Neuadd y Sir,
Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

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

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

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

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

RHAN A: Manylion cysylltu

PART A: Contact details

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

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

Enw Name	MR IAN EVANS	C.L JONES MRTPI
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	ACTING ON BEHALF OF LANDOWNERS	
Cyfeiriad Address	C/O AGENT	
Rhif ffôn Telephone no		
E-bost Email address		



Llofnodwyd (gallwch teipio) Signed (can be typed)	IAN EVANS	
Dyddiad Date	16th DECEMBER 2024	
RHAN B: Eich sylw PART B: Your representation		
Eich enw / sefydliad Your name / organisation	IAN EVANS	
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)	GN 16 RESIDENTIAL ALLOCATIONS	
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)	HSG/047/LDP2/1	
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.	N/A	
2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol. <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> 2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. <i>For more information on soundness and procedural requirements, see the guidance notes.</i>		
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.		
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed.	X	



<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i> I think that the procedural requirements have not been met.</p>		
<p>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>? <i>Ticiwch <u>bob un</u> sy'n berthnasol.</i></p> <p>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph? Tick <u>all</u> that apply.</p>		
<p><i>Dyraniad safle newydd</i> New site allocation</p>		<p>Extension to an already allocated site</p>
<p><i>Polisi newydd</i> New policy</p>		
<p><i>Paragraff neu destun ategol newydd</i> New paragraph or supporting text</p>		<p>Consequential changes required</p>
<p>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).</p> <p>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).</p>		
<p><i>Enw'r safle</i> Site name</p>	<p>Previously submitted as a Candidate site - land fronting B4586, Jeffreyston</p>	
<p><i>Cyfeiriad y cais</i> Site reference</p>	<p>No. 524</p>	
<p><i>Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.</i></p> <p>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</p>		



or new site.

5. Rhestrwch eich sylwadau isod.

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

5. Please set out your comments below.

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

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.



<p><i>Rwyf am siarad mewn sesiwn gwrandawriad.</i> I want to speak at a public hearing.</p>	X
<p><i>Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').</i> If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').</p>	
<p>GN 16 RESIDENTIAL ALLOCATIONS - HSG/047/LDP2/1</p>	
<p>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.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i> I wish to be heard in Welsh.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i> I wish to be heard in English.</p>	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/brofion 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.



**OBJECTION TO THE EXCLUSION OF AN AREA OF LAND
FROM ALLOCATED SITE HSG/047/LDP2/1
AT JEFFREYSTON
LOCAL DEVELOPMENT PLAN 2 DEPOSIT 2 PLAN
(2017- 2033)**

On behalf of

Mr. I. Evans

Our Ref: 2083.a
Date: December 2024
Prepared by: CLJ

I

[Redacted signature block]

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OBJECTION SITE: OVERVIEW

This objection considers the proposed allocated residential site for Jeffreyston (HSG/047/LDP2/1) to be “unsound” and, by definition, seeks amendment to the areal extent of this allocation and the defined settlement boundary as detailed in the Pembrokeshire County Council Local Development Plan 2 Deposit 2 Plan (2017-2033).

The inclusion of this additional land as an extension to the already allocated site will readily provide for the future housing needs of the local area and will contribute to the strategic aims and objectives of Local Development Plan 2 Deposit 2 Plan (2017-2033). It is relevant that the additional land adjoins the allocation (HSG/047/LDP2/1) and that there are no highway, amenity or service constraints preventing the site’s development.

1.0 INTRODUCTION

1.0.1 This representation is submitted in respect of the Pembrokeshire County Council Local Development Plan 2 Deposit 2 Plan (2017 - 2033) (hereon referred to as 'LDP2').

1.0.2 More specifically, this representation is made in respect of the proposed allocation of land 'South of the Crown', Jeffreyston, Pembrokeshire, SA68 0RN, which is allocated for the delivery of a minimum of 8 no. residential units (site reference HSG/047/LDP2/1).

1.0.3 The relevant site allocation policy is **GN 16 Residential Allocations**. The allocation site is depicted within the Jeffreyston inset map, that forms part of the LDP2's Proposals Map.

1.0.4 Other relevant LDP2 Area Wide Policies include:-

- GN 1 General Development Policy
- GN 2 Sustainable Design and Placemaking
- GN 3 Infrastructure and New Development
- GN 5 Renewable Energy – Target and Allocations
- GN13 Residential Development
- GN15 Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and Requirements for Lifetime Homes Standards
- GN 20 Local Needs Affordable Housing
- GN 21 Exception Sites for Local Needs Affordable Housing
- GN 22 Specialist and Supported Accommodation
- GN 29 Community Facilities
- GN 49 Landscape
- GN 53 Community Growing Spaces

Also of relevance, is Appendix 2: Housing Components and Trajectory, Table B: Anticipated Timing and Phasing of Allocated Sites.

- 1.0.5 This representation is submitted by Mr. I. Evans, the landowners' representative. The landowners own both the freehold of the already allocated site designated for residential development, and the adjacent tract of suitable land that remains unallocated.
- 1.0.6 At the outset, it can be confirmed that the respondent/objector **fully supports** Jeffreyston's HSG/047/LDP2/1 residential allocation, as well as the suggested delivery timing within the plan period. However, the seemingly arbitrary exclusion of a portion of land from the original candidate site area, and its exclusion therefore from within the defined settlement boundary, is not considered "sound". Accordingly, the respondent/objector seeks an amendment of the allocation boundary to include the additional land and its consequential designation as a residential allocation.
- 1.0.7 The areal extent of the additional land in relation to the already allocated site is depicted at *Figure 1*.

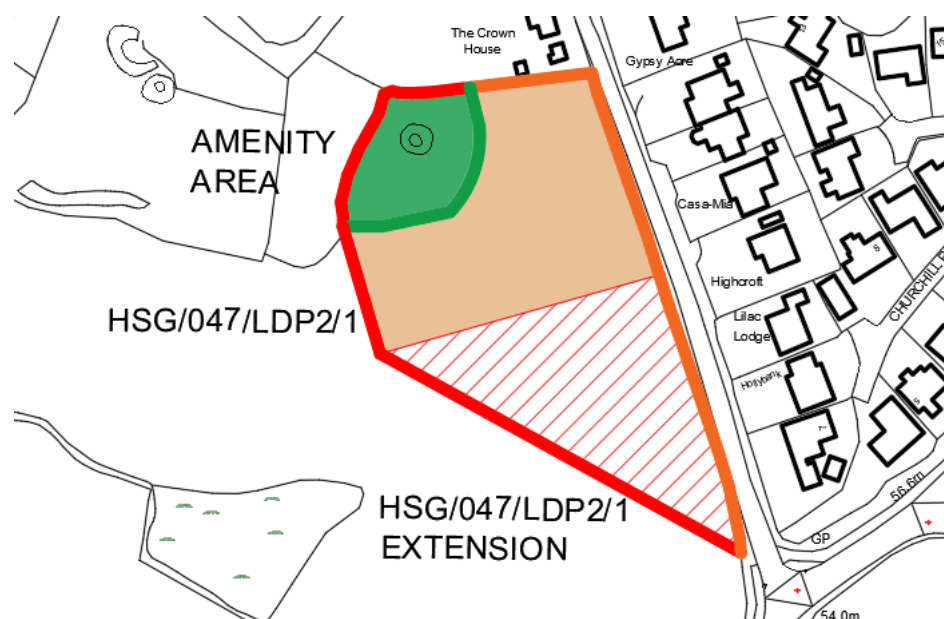


Fig.1 – Already allocated site HSG/047/LDP2/1 and suggested extension

A detailed site description was previously provided at the candidate site stage and therefore only a summary is reproduced below, but with amendments that reflect the areal extent differences.

2.0.2 Both the already allocated site and its suggested extension, and their relationship to Jeffreyston, are highlighted at *Figures 1* and *2*. The approximate dimensions of both the already allocated site and the extension site are as follows:-

-

.2.0.3 In two dimensional form, the already allocated site and its extension are of irregular shape, with few natural features of note, apart from a wooded area and a freestanding semi-mature Ash tree. They are bounded to the east by a mature hedgerow and the B4586 road, which contains two large Ash trees. The residential curtilage of 'Crown House', as well as the edge of a crenulated tract of woodland, form the northern

boundary. The western and southern boundaries merge seamlessly into the wider agricultural field enclosure (see *Figure 3*). Topographically, the landform can be described as slightly undulating and is extensively grazed and cropped for silage. There are no landscape or other physical features of note apart from the aforementioned modest size, wooded amenity area, the solitary Ash tree and 2 no. hedgerow Ash trees.



Fig. 3 - Visual context of HSG/047/LDP2/1 site

- 2.0.4 The residential properties on the opposite side of the B4586 road are, in the main, large, detached properties. They are situated at a higher level and display varying architectural style and qualities, taking full advantage of their road frontage aspect. Other more recent housing schemes within the village comprise more in-depth development.
- 2.0.5 Approximately 300 metres to the south-west is St. Oswald's Church in Wales VA School, which is currently partly linked to the village by a formally surfaced foot/cycle path, bounded on both sides by two hedgerows and created as part of the 'safe journey to schools' initiative. The development of both the already allocated site (HSG/047/LDP2/1) and its extension will facilitate the continuation of this safe access path further into the village. The sale of the land to Pembrokeshire County Council for the formation of this thoroughfare was readily agreed previously by the objector. On

learning of the school-related purpose for which the land was intended, the request - and the nominal fee offered - was immediately accepted without any requirement for negotiation.

- 2.0.6 The overall site can best be described as an area of intensively improved monoculture grassland and which is noticeably devoid of any other notable plant species.



Fig. 4 - Aerial image of HSG/047/LDP2/1 and extension (schematic)

- 2.0.7 The relationship of the entire site in terms of proximity to the adjacent highway is clear, and for the purposes of this submission, the accompanying illustrative layout depicts an access from B4586 road. The highway alignment at this point provides good horizontal and vertical visibility in both directions, allowing safe and efficient access. The highway's straight alignment is shown in *Figures 4 and 5*.
- 2.0.8 The mature hedgerow bounding the entire site along its eastern boundary with the B4586 is relatively rich in shrub species and forms an important ecological feature. From the outset, it was accepted that the hedgerow would need to be accommodated as part of any future site development proposals.



Fig. 5 - Alignment of B4586 looking south with HSG/047/LDP2/1 on right

- 2.0.9 Growing within the hedgerow are two fairly prominent mature trees, which on face value at least, are worthy of full protection, not least for their contribution to visual amenity. Regrettably however, the ravages of the *Chalara* Ash dieback disease (*Hymenoscyphus fraxineus*) is quickly negating the health and amenity value of these hitherto fine specimens. The standalone semi-mature Ash tree, located centrally within the site, will be retained if it survives the Ash fungal disease.
- 2.0.10 In summary therefore, there is no physical amenity feature within or adjacent to either the already allocated site or its proposed extension that will prevent a coordinated and appropriate future development.

3.0 PLANNING FRAMEWORK

- 3.0.1 The preparation and implementation of development plans is guided by the advice contained within the 'The Development Plans Manual' (Edition 3, March 2020). The manual is an online reference document for practitioners who are responsible for, or contribute to, development plans. It contains practical guidance on how to prepare, monitor and revise a development plan, and seeks to ensure that policy frameworks are effective and deliverable, and contribute to placemaking.
- 3.0.2 Sustainable development is at the heart of the development plan process. All development plans must ensure they contribute to achieving the economic, social, environmental and cultural well-being goals of Wales.
- 3.0.3 A key stipulation within the manual relates to "soundness":-
"...Section 64(2) of the 2004 Act specifically provides that an LPA must not submit an LDP unless it considers the plan is ready for examination. This means that 'unsound' plans should not be submitted for examination. The LPA will need to demonstrate that the plan meets the three tests of soundness..." (p.165).
- 3.0.4 The three tests are:-
- Test 1: Does the plan fit?
 - Test 2: Is the plan appropriate?
 - Test 3: Will the plan deliver?
- 3.0.5 The objector submits that the LDP2 does not meet the second test of soundness, and is therefore not appropriate because:-
- suitable alternatives have not been properly considered - specifically, the Council has not demonstrated why only the already allocated site has been identified to meet assessed needs and contribute to the achievement of sustainable development. The suggested extension to the already allocated site would provide greater development flexibility.

- the rationale behind the plan's policy has not been demonstrated.
- it is not logical and reasonable.

3.0.6 The remainder of this submission provides the case for the allocation of the additional land for residential development purposes. A suggested schematic layout for the site is reproduced at *Figure 6*.

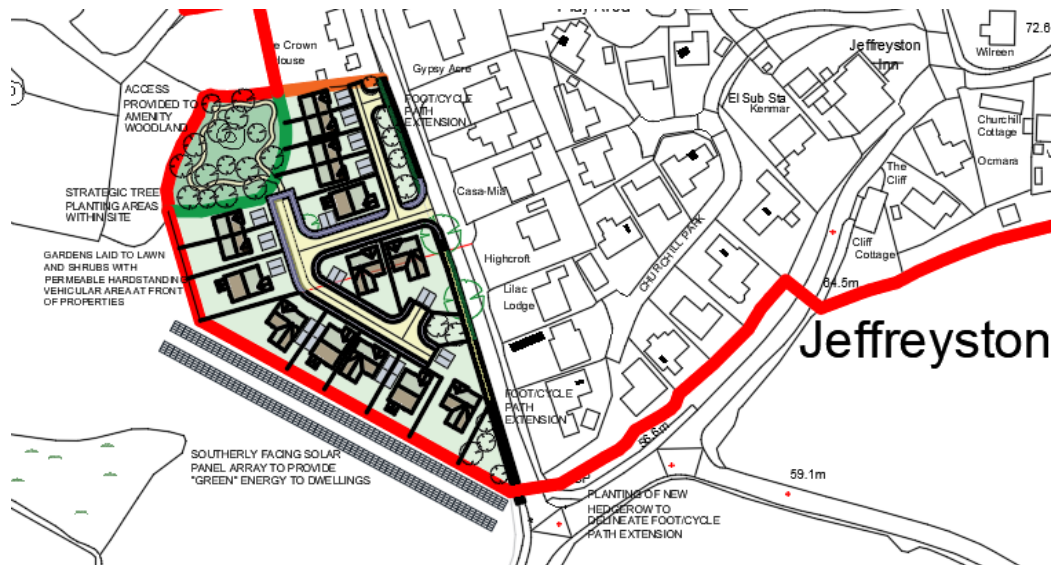


Fig. 6 – Suggested schematic site layout

4.0 HOW THE PLAN CAN BE MADE “SOUND”

- 4.0.1 It is submitted that the Deposit Plan can be made sound with only a minor modification to the details of the plan.
- 4.0.2 Within the scope and purpose of the ‘Examination in Public’ process, the required “soundness” can be secured by formally proposing a ‘new’ site allocation - in practice however, this simply equates to designating a small extension to the already allocated residential site (HSG/047/LDP2/1).
- 4.0.3 Effectively, it would entail a minor alteration to the Proposal Map’s defined settlement boundary as it relates to Jeffreyston – with consequential amendments to **GN 16 Residential Allocations** to increase the “Minimum units in Plan period” from 8 to 15.

HSG/047/LDP2/1	South of The Crown	Jeffreyston	8	Off-site contribution	LT	0	0.42	Yes
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Fig. 7 – LDP2 extract showing the already allocated site details

- 4.0.4 The suggested amendment will not impair the effectiveness of the overall LDP² policy framework.

4.1 LAND ‘NORTH OF SUNNYSIDE’ - ALTERNATIVE SITE UNDELIVERABILITY

- 4.1.1 The only other potential site for residential development within Jeffreyston is the land ‘North of Sunnyside’ which is located within the development limits. The suggested increase in the number of dwellings arising from an extension of the already allocated site (HSG/047/LDP2/1) would help compensate for the undeliverability of the previously identified site (‘North of Sunnyside’) located towards the northern end of the village of Jeffreyston.
- 4.1.2 The land North of Sunnyside site has long been identified for residential use but there has been no development progress and an on-site start has never materialised. Despite persistent marketing and the several housing booms that have taken place, there have been decades of non-activity.

- 4.1.3 In fact, it would be fair to state, that if considered afresh, the land North of Sunnyside site would not be deemed suitable for residential development and is only being retained within Jeffreyton's development limits due to being a 'carry forward' or 'legacy' site from previous years. The lack of development progress at land North of Sunnyside and its consequential role in stifling opportunities elsewhere, is a good example of why expired planning consents and past build rates should not be relied upon as the sole evidence base to determine future housing land requirements.
- 4.1.4 The land North of Sunnyside site suffers from poor access and surrounding highway network and is compromised by significant tree cover. The fact that it is north-facing and does not follow the general topographical drainage patterns are further factors inhibiting its development – as is evidenced by the lack of commencement.
- 4.1.5 In effect, its retention continues to prevent the release of other more suitable residential land elsewhere within the village - particularly, the proposed extension that is subject of this submission.

4.2 EXTENDING HSG/047/LDP2/1 RATIONALE

- 4.2.1 The current allocated site HSG/047/LDP2/1 is broadly rectangular in shape, but its full development will be restricted by a section of wooded area located within its north-western corner and identified in LDP2 for amenity purposes.
- 4.2.2 The already allocated site can be readily developed for a minimum of 8 no. dwellings but its deliverability would be greatly improved if allowed to extend, as shown in *Figures 1 and 6*.
- 4.2.3 In support of extending the already allocated site, the following points are of relevance:-
- In its recognition of Jeffreyton as a defined settlement, the Pembrokeshire Local Development Plan LDP2 therefore, by definition, confirms and acknowledges its **sustainable development credentials**. There is therefore no need to emphasise

the sustainable character of the village by making reference to levels of public transport, education facilities, retail, etc., as these credentials are all automatically confirmed by the Council.

- A further important consideration is the fact that the south-western edge of Jeffreyston is clearly regarded by the Local Authority as the **most appropriate location** to extend the village and to provide for its growth. This approach is confirmed by the location of the relatively modern village school, as well as the designation of the already allocated site. There is little doubt therefore that the effective 'direction of travel' for new housing development is along the south-western fringe, which will engender a sustainable future for Jeffreyston.
- The most obvious development scenario for both the already allocated site and the proposed extension would entail the construction of single storey dwellings in order to minimise any visual impact. Such dwellings however are not as efficient in terms of securing appropriate densities in comparison to multi-storey dwellings. Whilst the proposed allocation for the minimum 8 no. dwellings is certainly viable, the additional 7 no. dwellings will **provide development flexibility**, as well as securing 2 no. affordable dwellings on site.
- The provision of quality, single storey dwellings will help to satisfy the continued demand for such appropriate age-specific accommodation from an increasingly elderly population.

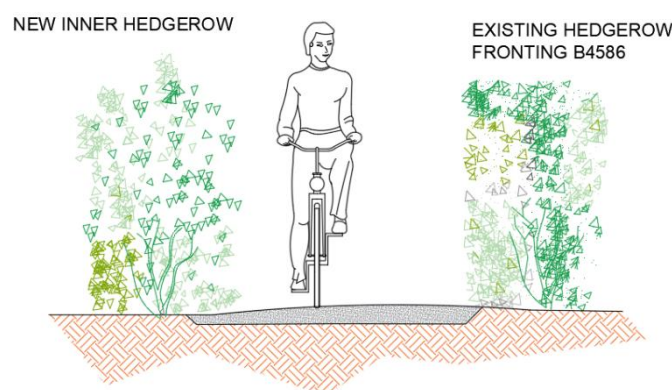


Fig. 8 - Proposed extension to existing surfaced foot/cycle path to be constructed along entire frontage of the already allocated site and the proposed extension

- The existing hedgerow that bounds the highway side of the site (the B4586) is an important linear ecological and landscape corridor which will be protected and further augmented with the planting of a new and parallel hedgerow to accommodate the safe route to school path along the entire site frontage. There will therefore be **no loss of either connectivity or biodiversity**.
- Both the already allocated site and the extension are at a lower level in comparison to the residential dwellings on the opposite side of the highway which, in combination with the intervening distances, **will not give rise to any issues associated with overlooking or overbearing**.
- Although the three prominent trees within the site will be **afforded full protection** in any future development layout, it is regrettable to note that at least two are suffering from 'die-back'.
- The extension to the already allocated site will also enable the continuation of the existing foot/cycle path along the frontage of the site and will be demarcated by a newly planted hedgerow inside the line of the existing hedgerow. This important community facility will foster **safe pedestrian movement** along the B4586, especially for those children attending the nearby village school.



Fig. 9 - Alignment of proposed extension to existing foot/cycle path

- The Objector's ownership of the surrounding land means there is considerable opportunity for **environmental gain** – in particular, the opportunity to provide a south-facing solar panel array to serve the entire development scheme. Such a proposal would make a valid contribution to **carbon footprint reduction and will help to attain net zero** – important material considerations. Any new solar apparatus and equipment do not however need to be included within the defined development limits, and therefore there is no impact on the area of developable land within the extended area.
- The indicative layout embedded at *Figure 6* demonstrates the manner in which both the already allocated and the extended site can be developed without impacting any recognised amenity consideration. The overall layout represents a **natural and appropriate 'rounding off'** to the settlement, whilst providing a defined physical edge to Jeffreyston. The development would be well-integrated and reflects the existing physical form in terms of **providing a visually pleasing and quality development** at this key gateway to the village.
- The provision of pedestrian visitor access to the amenity area, the provision of a new pavement linking to the school, the beneficial incorporation of solar energy generation, and the inclusion of affordable housing are all commendable aspects of the scheme and will result in considerable benefit to the Jeffreyston community.

4.2.4 The allocation of the additional land will help secure sufficient housing growth for the village and at the same time, will provide sufficient flexibility to deal with potential adverse and unforeseen events during the remainder of the plan period, such as:-

- the need for increased investment to overcome the expected global economic downturn, arising from conflict, climate change and investment relocation.
- the expected introduction of new pollution controls which will impact housing developments.
- changing societal needs stemming from an increased demand to work from home.

- the ongoing emergence of private e-transport, reducing the high carbon footprint hitherto associated with private motor vehicle use.

4.2.5 In addition, the extension of the already allocated site will provide a higher level of on-site affordable housing as opposed to the currently required off-site contribution – a consideration that was confirmed in the previously submitted site viability information.

4.2.6 The net result of the hitherto lack of adequate development within the village means that, despite Jeffreyston's convenient access to community facilities and services, its ability to grow and capitalise on these sustainable attributes will be held back. The deliverability of the land 'North of Sunnyside', which has been relegated to "windfall" status within LDP2, is clearly in doubt. In order therefore to address the deficit in provision, and to capitalise on the sustainability of this 'service village, more 'deliverable' residential allocations, such as the suggested extension, are urgently required.

4.2.7 The extension of the already allocated site as a residential development opportunity in the forthcoming replacement Pembrokeshire Local Development Plan in the manner suggested, will assist in addressing this obvious shortfall and will provide much needed residential accommodation within Jeffreyston. Without the allocation of this additional land, the future of Jeffreyston will continue to be held back.

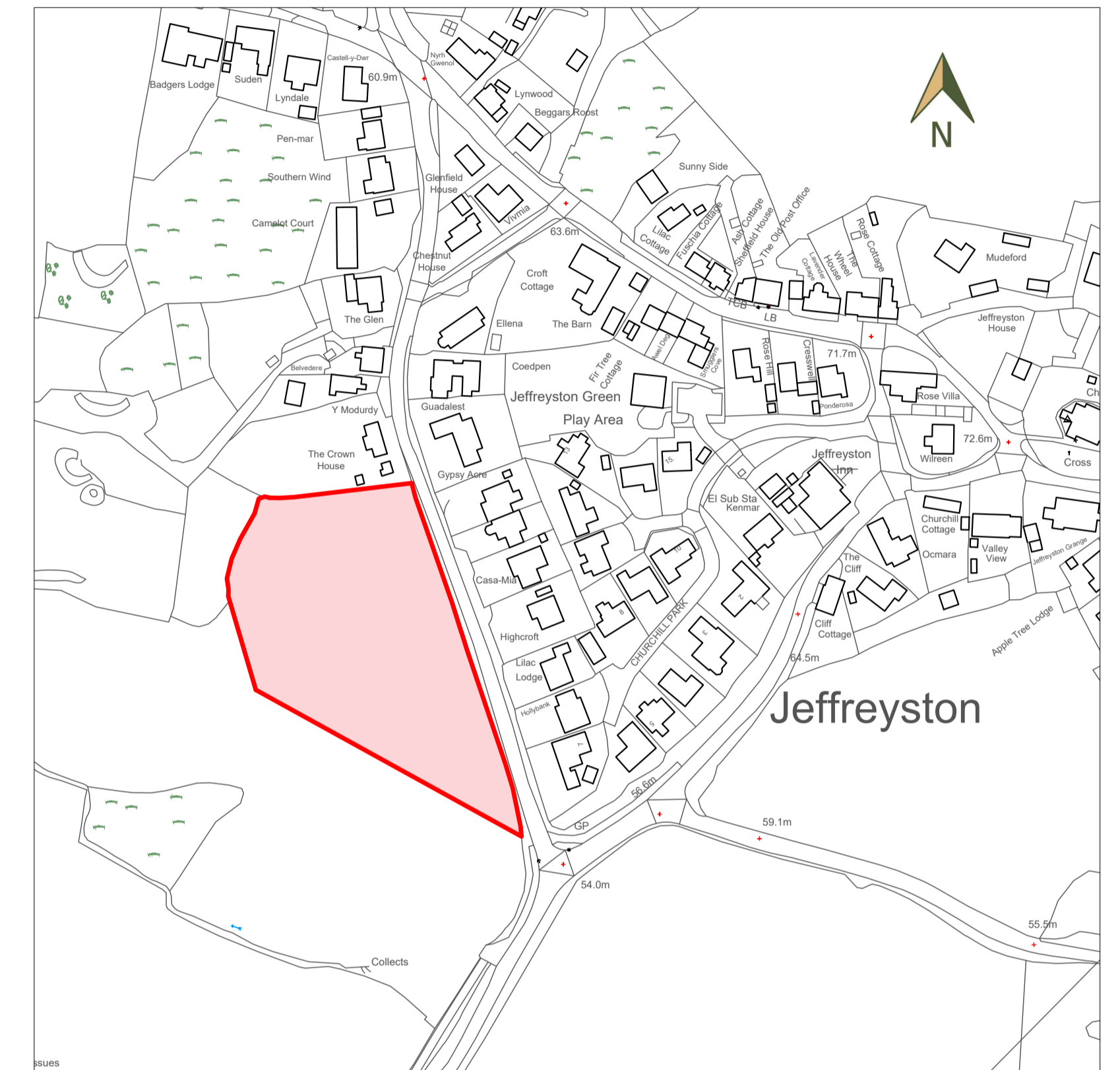
5.0 CONCLUSION

- 5.0.1 This submission questions the validity of the LDP2 in meeting the second test of soundness. Consideration should have been given to extending the allocation site so as to secure the interests of sustainable development.
- 5.0.2 Restricting residential development in this area to a minimum of 8 no. dwellings is not justified, given the lack of suitable housing land elsewhere. During the plan period, Jeffreyston requires greater flexibility in terms of its housing allocation and there is no logical or reasonable justification to exclude the proposed 'rounding off' of the village. The suggested extension would further support the communal well-being of Jeffreyston's residents, whilst safeguarding all amenity issues.
- 5.0.3 The allocation of the additional land would not give rise to environmental pressure, but instead would lead to the fostering of sustainable growth and allow for a wider choice of housing type.
- 5.0.4 The overall site represents a sustainable and deliverable opportunity to provide new housing within Jeffreyston. With the site capable of being readily served by utilities, together with an efficient means of access from the adjoining public highway, there are no barriers to its delivery in the early stages of the forthcoming plan.
- 5.0.5 In terms of deliverability, the overall site scores highly in all regards. The absence of any constraints and the predicted financial values (previously supplied) ensure that the LPA2's enhanced affordable housing requirement for this site can be readily achieved.
- 5.0.6 The already allocated site and the extension are both located within a convenient walking distance of Jeffreyston's existing community services and facilities, whilst also benefiting from convenient regular public transport links with nearby settlements.
- 5.0.7 The overall site is located immediately adjacent to existing residential properties, and its development:-
- would be acceptable to both the form and character of the locality

- would not be detrimental to the amenity of adjacent properties
- would satisfy recognised housing and sustainability objectives
- would not have a detrimental impact on the landscape or nature conservation interests.


5.0.8 There are no access issues, adverse ground conditions, flood risk, hydrological, ecological, archaeological or land ownership related constraints – the delivery of the development is assured.

5.0.9 For the reasons set out above, it is respectfully requested that favourable consideration be given to the extension of the already allocated site HSG/047/LDP2/1 and thereby its inclusion within residential development limits for Jeffreyston.



<h1 style="margin: 0;">LOCATION & SCHEMATIC SITE PLAN</h1>		
<h2 style="margin: 0;">LAND SOUTH OF THE CROWN, JEFFREYSTON</h2>		
<h1 style="margin: 0;">EXTENSION TO HSG/047/LDP2/1</h1>		
SCALE @ A1	DATE	DRAWN BY
500 & 2000	DECEMBER 2024	S1-J
JOB NO	DRAWING NO.	REVISION
2083/2	GPLCC/001	

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ALL CONSTRUCTION DETAIL AT BUILDING REGULATIONS STAGE**



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