

Thomas, Kane

From: [REDACTED]
Sent: 16 December 2024 14:10
To: LDP - For Enquiries
Cc: Greaney, Ryan
Subject: Deposit Consultation Response
Attachments: PHWW Deposit V2 Consultation Letter .pdf; Deposit Plan 2 Comments Form - Persimmon Homes.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.*

Good afternoon,

Please find enclosed Persimmon Homes West Wales representations to the Deposit Plan Consultation.

If you have any queries please let me know.

Many thanks,

Kate Harrison | Strategic Planning Manager
Persimmon Homes West Wales | Dragon House, Parc Y Ddraig, Penllergaer Business Park, Swansea, SA4 9HJ

[REDACTED]



Supporting Communities

Persimmon supports local communities through our Community Champions programme, donating £750,000 each year, and our Building Futures scheme with its donations of over £1 million.

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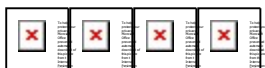
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England number 1182689 and Space4 Limited is registered in England number 3702606.

These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

This email has been scanned for viruses and malware.



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 dudalennauchwanegol 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	Kate Harrison	
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)	Strategic Planning Manager	
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	Persimmon Homes West Wales	
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (you can type)	K Harrison	

Signed (can be typed)	
Dyddiad Date	16.12.2024
RHAN B: Eich sylw	
PART B: Your representation	
Eich enw / sefydliad Your name / organisation	Persimmon Homes West Wales
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)	GN16 Residential Allocations GN15 Housing Mix, Second Homes and Short-term Holiday lets, Space Standards and Requirements for Lifetime Homes Standards HSG/095/LDP2/1
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	GN16 Residential Allocations GN15 Housing Mix, Second Homes and Short-term Holiday lets, Space Standards and Requirements for Lifetime Homes Standards HSG/095/LDP2/1
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	HSG/095/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.	Deposit LDP
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.		
<i>Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.</i> I think the LDP is unsound and should be changed.		X
<i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i> 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>? <i>Ticiwch <u>bob un</u> sy'n berthnasol.</i> 3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph? Tick <u>all</u> that apply.		
<i>Dyraniad safle newydd</i> New site allocation		
<i>Polisi newydd</i> New policy		
<i>Paragraff neu destun ategol newydd</i> 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).		
<i>Enw'r safle</i> Site name		
<i>Cyfeiriad y cais</i> Site reference		
<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> 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.

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.	
<i>Rwyf am siarad mewn sesiwn gwrandawriad.</i> I want to speak at a public hearing.	X
<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').	
HSG/095/LDP2/1	
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.	
<i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i> I wish to be heard in Welsh.	
<i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i> 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.



Date: 16.12.2024

Dear Sirs/Madam,

Persimmon Homes West Wales – Representations to the Pembrokeshire County Council Deposit Local Development Plan Consultation

Introduction

Persimmon Homes West Wales write to submit these representations in respect of the current Pembrokeshire Deposit Local Development Plan (2017 to 2033) ("Deposit Plan") consultation. As the Council will be aware, Persimmon Homes West Wales are actively promoting the below site on which we have a legal position:

HSG/095/LDP2/1 Between St Daniels Hill & Norgans Hill in Pembroke

Promotional documents were submitted as part of the candidate site submission which provide a full overview of the site. We have been working with the Council to promote the deliverability of the site. Persimmon Homes are one of the UK's leading house builders, who operate from 29 regional offices throughout the UK, with the local office being Persimmon Homes West Wales. We are a 5 star House Builder based on the HBF Customer satisfaction score and aim to deliver high quality homes for the communities we operate in. Persimmon Homes West Wales cover Local Planning Authority areas from Rhondda Cynon Taff to Pembrokeshire Coast National Park and have a great deal of experience and success in working in the Planning System in Wales and delivering homes. Fundamental to this success is the integrated approach we take from the outset towards the effective alignment of planning, commercial and viability matters.

This letter focuses on our key comments with the Deposit Plan and overall housing strategy, reflecting on each matter with regard to the 'tests of soundness', to ensure compliance with the requirements of the Planning and Compulsory Purchase Act 2004 and Planning Policy Wales 12 (PPW 12) (February 2024).

Soundness

The fundamental requirement for a Local Development Plan to be sound is prescribed in the Planning and Compulsory Purchase Act 2004. With regard to the 'tests of soundness', whilst there is no statutory definition of 'soundness' the Development Plans Manual (Edition 3) (March 2020) advises that the following criteria should be considered:

- Test 1. Does the plan fit?
- Test 2. Is the Plan appropriate?
- Test 3. Will the Plan deliver?

The removal of the 5 year housing land supply policy within PPW 12 and TAN 1 and the replacement with



the housing trajectory approach to monitor the delivery of LDP housing requirements, places even greater importance on ensuring that the housing trajectory is credible and realistic and it is critical that the housing allocations proposed in emerging Local Development Plans are appropriately and robustly evidenced to ensure that they are realistically deliverable.

Planning Policy Wales Edition 12 sets out the land use planning policies of the Welsh Government with its primary objective being to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

PPW 12 states that the *'planning system must:*

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

'The supply of land to meet the housing requirement proposed in a development plan must be deliverable. To achieve this, development plans must include a supply of land which delivers the identified housing requirement figure and makes a locally appropriate additional flexibility allowance for sites not coming forward during the plan period. The ability to deliver requirements must be demonstrated through a housing trajectory. The trajectory should be prepared as part of the development plan process and form part of the plan. The trajectory will illustrate the expected rate of housing delivery for both market and affordable housing for the plan period. To be 'deliverable', sites must be free, or readily freed, from planning, physical and ownership constraints and be economically viable at the point in the trajectory when they are due to come forward for development in order to support the creation of sustainable communities'.

'As part of demonstrating the deliverability of housing sites, financial viability must be assessed prior to their inclusion as allocations in a development plan. At the 'Candidate Site' stage of development plan preparation land owners/developers must carry out an initial site viability assessment and provide evidence to demonstrate the financial deliverability of their sites. At the 'Deposit' stage, there must be a high level plan-wide viability appraisal undertaken to give certainty that the development plan and its policies can be delivered in principle, taking into account affordable housing targets, infrastructure and other policy requirements'.

GN 15 Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and Requirements for Lifetime Homes Standards

Point D and E of GN 15 refer to space standards with reference to the Lifetime Homes Standards and Welsh Development Quality Requirements 2021. Clarification of the Space Standards should be provided.

GN16 Housing Allocations HSG/095/LDP2/1 Between St Daniels Hill & Norgans Hill in Pembroke

Persimmon Homes West Wales are actively promoting the site above and have a legal position via an Option Agreement on the land. We have undertaken a range of survey work and are ready to progress with a planning application on the adoption of the Revised Local Development Plan. Following Planning





permission in 2025, we would look to commence works on site in 2026 for the delivery of homes in Pembrokeshire. Following the publication of the Deposit plan, Persimmon Homes would like to raise the following points below in regards to the affordable housing target set for this particular draft allocation.

In the existing LDP, there were 5 allocations within the settlement of Pembroke as listed below. The allocations range from 58 – 150 dwellings and all have an indicative affordable housing requirement of 10%.

HSG/095/00154 – North and West of Railway Tunnel – 150 dwellings

HSG/095/00153 – Adjacent to Monkton Swifts – 118 dwellings

HSG/095/00147 – Adjacent to Long Mains and Monkton Priory – 115 dwellings

HSG/095/00144 – North of Gibbs Way – 70 dwellings

HSG/095/00144 – South of Gibbs Way – 58 dwellings

From assessing the 2022-2023 AMR, it appears that the sites highlighted in bold above do not benefit from planning permission or have not commenced development on site. We do not have the details of why these sites have not come forward for development, however viability is a key consideration in Pembrokeshire. The consideration of additional build costs due to location needs to be considered.

Within the Deposit LDP2 HSG/095/LDP2/5 which is South East of Southlands St Daniels Hill has an indicative percentage for affordable housing of 15%. HSG/095/LDP2/2 which is South West of Southlands, St. Daniels Hill has an affordable housing percentage of 12.5%. These sites are directly adjacent to the site in which Persimmon Homes are promoting (HSG/095/LDP2/2) however have a significantly lower affordable housing percentage.

Persimmon Homes is supportive of the delivery of affordable homes across Wales and will work to deliver a mix of tenure housing to serve the communities in which we build. We are also dedicated in bringing the Land at St Daniels Hill and Norgans Hill forward for development. However, wish to raise and request additional viability work in partnership on the allocation to ensure that the level of affordable housing is achievable and viable as the change from 10-15% target within the previous iteration of the Deposit Plan to 25% within this draft of the Deposit plan is not understood.

If you require any further information on the above or would like to discuss any points, please do not hesitate to contact me.

Kind regards,

Kate Harrison
Strategic Planning Manager
Persimmon Homes West Wales

