



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](mailto: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](mailto: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><br>Name                                                        | Mr Llewellyn       | Miss India Woodruff               |
| <i>Teitl swydd (lle y bo'n berthnasol)</i><br>Job title (where relevant)  |                    | Graduate Town Planner             |
| <i>Sefydliad (lle y bo'n berthnasol)</i><br>Organisation (where relevant) |                    | Harries Planning Design Managment |
| <i>Cyfeiriad</i><br>Address                                               |                    |                                   |
| <i>Rhif ffôn</i><br>Telephone no                                          |                    |                                   |
| E-bost<br>Email address                                                   |                    |                                   |
| <i>Llofnodwyd (gallwch teipio)</i><br>Signed (can be typed)               | India Woodruff     |                                   |
| <i>Dyddiad</i><br>Date                                                    | 13th December 2024 |                                   |



**RHAN B: Eich sylw**

**PART B: Your representation**

*Eich enw / sefydliad*

Your name / organisation

India Woodruff, Harries Planning Design Management

**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)

*Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol*

LDP Proposals Map reference(s)

Hermon Inset Map

*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.

Cover Letter

Appendix 1 – Site Plan

**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

N/A

*Polisi newydd*

New policy

N/A

*Paragraff neu destun ategol newydd*

New paragraph or supporting text

N/A

**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/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.

Please see covering letter and appendices

*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.

X

*Rwyf am siarad mewn sesiwn gwrandawriad.*

I want to speak at a public hearing.

*Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').*

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').



**9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.**

**9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.**

*Rwy'n dymuno cael fy nghlywed yn Gymraeg.*

I wish to be heard in Welsh.

N/A

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

N/A





## 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.

The Development Plans Team  
Planning Department  
County Hall  
Haverfordwest  
Pembrokeshire  
SA61 1TP

Date: 13<sup>th</sup> December 2024

**HPDM/1639**

Dear Local Development Plan Team,

**Re: Deposit LDP Representation: Site West of Parc Yr Eos, Hermon, Pembrokeshire.**

Please find the attached representation form which should be read in conjunction with this covering letter.

This representation seeks the inclusion of the above-mentioned site as 'white land' within the revised settlement boundary of Hermon, a designated Service Village within the Deposit LDP. It is submitted on behalf of our client and landowner Mr Llewellyn.

Having considered the consultation documents, it is contended that the LDP is unsound under Soundness Test No. 2 'Is the plan appropriate', in that it fails to address a local need for a mix of housing provision within Hermon and its surrounding rural area. Furthermore, this site's omission does not appear to be consistent with the LDP's evidence base and drafted policies.

#### The Deposit Plan

It is noted that allocation (Deposit Ref: 042/00013) is included within Hermon for a minimum of 8 units, with a minimum of 5% affordable housing. At present this site has not yet been developed and therefore, its delivery within the LDP planned period is unknown.

Therefore, as revised, the Deposit LDP makes no significant provision for the development of available market housing within Hermon during the plan period, with limited scope for infill plots within the village .



## The Proposed Site

The proposed site comprises a relatively level parcel of semi-improved agricultural land, accessed via the through road within Hermon. The parcel abuts the main built form of Hermon on its eastern boundary. The boundaries comprise a mixture of hedgerow and typical residential boundary treatments. The site is considered to hold a strong physical and visual relationship with the settlement whilst avoiding any visually prominent or key views into/out of Hermon. There are no known environmental constraints present on site.

## The Soundness Tests

Inclusion of the site within the boundary is considered to meet the three soundness tests for the following reasons:

### Test 1: Does the plan fit?

The site is located within the settlement core, with good accessible links and is surrounded by residential development. It is not visually prominent and does not hold any significant ecological value. It is considered to comply with the thrust of national and local policy with respect to the sustainable location of new development within existing rural settlements.

### Test 2: Is the plan appropriate?

Deposit LDP2 Policy SP6 – Settlement Hierarchy, enables the provision of windfall market housing withing Service Villages. The Housing Supply and Trajectory Background Paper (July 2024) identifies a trend of falling windfall provision from Service Villages due to there being fewer opportunities within the settlement boundaries.

The site's location and physical characteristics would appear to accord with the principles for designating settlement boundaries, under Deposit LDP Policy SP7 Settlement Boundaries and SP9 Service Centres and Service Villages in that it would not cause a large extension into open countryside, is sustainable in its location with functional and visual links to the village and is not ecologically sensitive. Its scale, is considered to remain commensurate with the overall scale of the existing village and would serve to further support the strong level of services and amenities present.

It would therefore seem appropriate to include this site within the revised settlement boundary, to enable greater opportunity for a mix of tenure type to be provided and as such, improve the overall sustainability of this local rural community.

### Test 3: Will the plan deliver?

Mr Llewellyn is a willing landowner who is committed to bringing development forward within the plan period. In this respect, it is envisaged that development will take place in the Short Term (year 1-5), following a successful planning application.

The development of the site would contribute to the overall windfall housing provision during the plan period and would therefore provide the Council with greater flexibility under its 10% contingency, which has been factored into the LDP figures.

## Conclusion

It is considered that the inclusion of the proposed site would enable a sustainable form of development, which would align with the revised strategy of the Deposit LDP2. It would enhance the LDP's responsiveness to the needs of the local rural community by providing a proportionate and balanced level of development opportunity, in an area which has a strong level of services and amenities, accessibility and infrastructure. As such, the site's inclusion will improve the overall soundness of the plan.

Yours sincerely,

**India Woodruff**

**Harries Planning Design Management**

