



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	Mr James	Miss India Woodruff
<i>Teitl swydd (lle y bo'n berthnasol)</i> Job title (where relevant)		Graduate Town Planner
<i>Sefydliad (lle y bo'n berthnasol)</i> Organisation (where relevant)		Harries Planning Design Managment
<i>Cyfeiriad</i> Address		
<i>Rhif ffôn</i> Telephone no		
E-bost Email address		
<i>Llofnodwyd (gallwch teipio)</i> Signed (can be typed)	India Woodruff	
<i>Dyddiad</i> 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)

Crymych 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

X

Polisi newydd

New policy

Paragraff neu destun ategol newydd

New paragraph or supporting text

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

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

Enw'r safle

Site name

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.

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 Local Development Plan Team
Planning Department
County Hall
Haverfordwest
Pembrokeshire
SA61 1TP

Date: 13th December 2024

WTH/AJ/1639

Dear Local Development Plan Team,

Re: Deposit LDP2 Representation: Land north of Bwlchclawdd Bach, Crymych, SA41 3RL.

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 'an employment site for A1, A2, B2 and suis generis use for an energy centre' within the revised settlement boundary of Crymych, a designated Service Centre within the Deposit LDP2. It is submitted on behalf of our client and landowner Mr James.

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 A1, A2, B2 employment and also the provision of an energy centre (petrol station/electric charging) within Crymych 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.

Deposit Plan

Within the current Local Development Plan, Crymych is designated as a Service Centre, it is considered to offer a good provision of services and facilities to meet the day to day needs of its population. Within Service Centres, employment allocations are identified, with opportunities for new commercial, employment facilities which are accessible and serve the local community. The deposit plan identifies site EMP/030/00001 (Parc Gwynfryn) and EMP/030/LDP2/01 (South of Parc Gwynfryn) for B1 and B8 use but there is no provision for B2 use within the north of the county. Additionally, there is no provision for expansion of A1 or A2 uses within Crymych.

The Proposed Site

The proposed site is a parcel of existing agricultural land to the north of Bwlchclawdd Bach. The site is accessed currently via a small track off the A478. However, there is scope (in compliance with highways requirements) to provide access either off the A478 or through the existing field gates to the north of the site. The immediate site vicinity is agricultural land and outbuildings, with the designation



for employment use at Land South of Parc Gwynfryn directly opposite. The site is separated from housing developments by agricultural outbuildings, the A478 and a road to the north. It would follow the built form of Crymych and be read in context with the existing industrial and employment sites at Parc Gwynfryn, given their close proximity and the acceptability of a new employment site across the road from this parcel of land. The land is located on the existing settlement boundary and is readily accessed via existing footpaths and bus services. The site does not contain any existing ecological or historical designations and any forthcoming planning application on the land must be served by the relevant ecological assessments.

The Soundness Tests

Inclusion of the site as a designated employment site 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 existing employment and commercial 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 settlements.

Test 2: Is the plan appropriate?

Deposit LDP2 Policy GN9 – Employment Allocations, enables the provision of allocated sites for employment uses in use classes B1, B2 and/or B8. It also states that where appropriate, other classes of employment use or compatible *suis generis* uses may also be permitted on the allocated sites. We are requesting the site be included to provide A1, A2, B2 and a *suis generis* use for an energy centre. At present, there is no allocated designation within the north of the county for B2 (general industrial) use, with limited B8 allocations. The site's location and physical characteristics would appear to accord with the principles for designating the land appropriate for A1, A2 and B2 and a *suis generis* use, under Deposit LDP Policy SP9 Employment Allocations in that it would not cause a large extension into open countryside, is sustainable in its location with functional and visual links to the centre and is not ecologically sensitive. It seeks to provide provision for a use class where there is no provision, in a location which would not negatively impact the surrounding area and is suitable for the proposal. Its scale is considered to remain commensurate with the overall scale of the existing Centre and would serve to further support the strong level of services and amenities present. It would therefore seem appropriate to include this site as an allocation, to enable greater opportunity for a mix of employment types to be provided and as such, improve the overall sustainability of this local rural community.

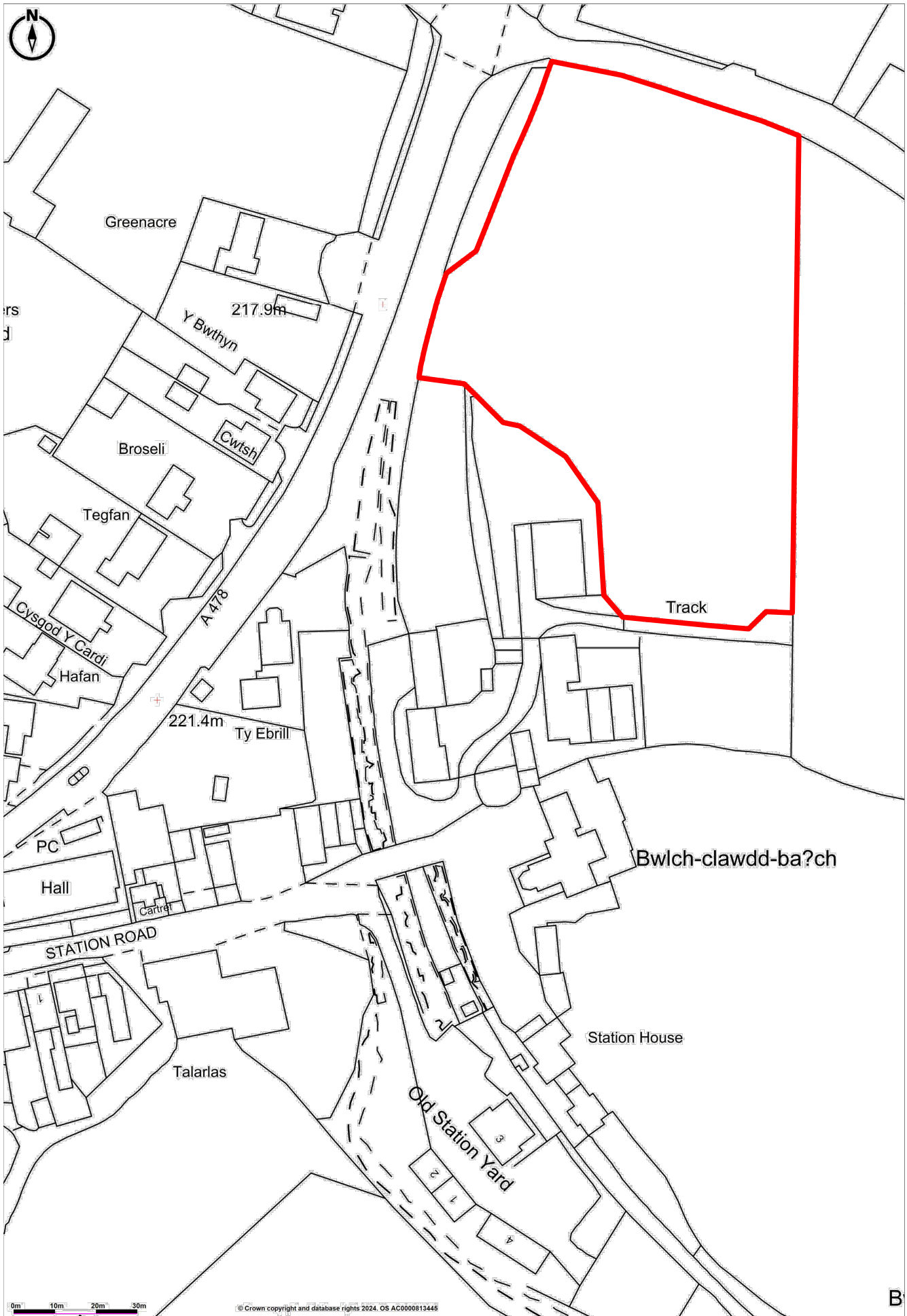
Test 3: Will the plan deliver?

Mr James 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 economic activity within Crymych and the wider area, providing required industrial land and energy centre for the northern areas of Pembrokeshire.

In respect of the above considerations and the additional information contained within the attached form, it is considered that the proposed site would provide a sustainable form of development on the edge of an existing settlement, complimenting the existing linear built form. Should any further information be required to inform this first phase of site consideration, please do not hesitate to contact me.

Yours sincerely,

India Woodruff
Harries Planning Design Management



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