



*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)**

Enw Name	Mr E.N and Mrs V.A Jones	Llyr Evans
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		Llyr Evans Planning Ltd
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)		
Dyddiad Date	13/12/2024	



## **RHAN B: Eich sylw**

### **PART B: Your representation**

*Eich enw / sefydliad*

Your name / organisation

Llyr Evans Planning Ltd

### **1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?**

#### **1. Which part(s) of the Plan (or supporting documents) are you commenting on?**

*Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle*

LDP policy or site allocation number(s)

*Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran*

LDP paragraph or section number(s)

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

LDP Proposals Map reference(s)

Hermon, LDP2 Deposit page 49

*Os yw eich sylw yn perthyn i ddogfen ategol (e.e. y Gwerthusiad o Gynaliadwyedd), rhowch yr enw(au) a'r cyfeiriad(au) i mewn yma.*

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.

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

*I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.*

#### **2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.**

*For more information on soundness and procedural requirements, see the guidance notes.*

*Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.*

I think the LDP is sound and meets procedural requirements.

*Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.*

I think the LDP is unsound and should be changed.

✓

*Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.*

I think that the procedural requirements have not been met.

### **3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?**

*Ticiwch bob un sy'n berthnasol.*



### 3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

*Dyraniad safle newydd*

New site allocation

✓

*Polisi newydd*

New policy

*Paragraff neu destun ategol newydd*

New paragraph or supporting text

**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

Land west of Bromeini, Hermon, Glogue, Pembrokeshire. SA360EB

*Cyfeiriad y cais*

Site reference

Candidate site reference 190

*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.

The site, Land West of Bromeini was submitted as a candidate site number 190 and was discounted by PCC due to an alternative site within the village providing a level of growth appropriate for the settlement, which was also considered to be better related to the built form of the settlement (LDP Candidate Site Assessment- Initial Outcome).

The alternative site (042/00013) has been carried through as a residential commitment under the LDP2 Deposit 2, this despite the site being undeveloped during the plan period of the LDP1. Whilst the commitment is acknowledged, although there does not appear to be a record of a Certificate of Lawful Development confirming the implementation of the planning permission on the PCC website, the lack of construction to date raises concerns over whether the LDP2 may not deliver on housing as expected or required. It is therefore contended that additional, or supplementary allocations would be sensible within Hermon, to provide a suitable delivery of housing.

The 60/40 proportion for urban/ rural housing delivery as set out in the LDP2 would generally seem appropriate based on historic delivery of housing and general sustainable development principles.

The target figure of 365 dwellings per annum plus 10% flexibility allowance would also seem to be an appropriate starting point.

The Housing Supply and Trajectory Background Paper (2024) identifies site 042/00013 as providing a commitment of 15 dwellings with 8 expected to be developed during the plan period and the remainder beyond the plan period. This would effectively provide Hermon with only 8 new dwellings until 2033 and it is questioned whether this is sufficient. Furthermore, it is understood that none of the dwellings would be affordable due to the historic nature of the commitment. It is understood that the site has been subject to outline consents with renewals over the years (initially granted outline planning permission in 2007) with reserved matters approved in 2019, with little activity on site, there is therefore no guarantee that any housing would be delivered during the plan period.

Hermon scores fairly well in terms of settlement service provision, at 20, under the Rural Facilities Survey Report (2024 update) and given its functional link to the larger settlement of Crymych it could be argued that the settlement could sustain a higher level of housing growth. Therefore if both the committed site and Land West of Bromeini were to come forward within the plan period, this would not seem problematic. It is also noteworthy that a number of other Service Villages, occupying similar settlement hierarchy position and having a comparable, or less weighting score of service provision have larger housing commitments/ allocations. For example, Clarbston Road, which has a service provision score of 20, and has a housing commitment/ allocation of 19 (4 more than Hermon and 11 more than the anticipated plan period delivery for Hermon), Begelley which has a service provision score of 21 and 46 commitments; and Tegryn which has a service provision score



of 17 and housing commitment of 26 (Source: Rural Facilities Report Housing Supply and Trajectory- LDP2 Evidence Base). These settlements have comparable service provision but significantly higher commitments for housing than Hermon, when compared to what would be delivered in Hermon during the plan period.

Based on the position of Hermon within the settlement hierarchy and the relatively good service provision it is reasonable to conclude that Hermon is a suitable location for housing. In contrast to the committed site, land west of Bromeini could provide circa 20 dwellings based on a site area of 0.84ha and anticipated density as set out in the Deposit LDP2 of 23dph and provide a proportion of affordable housing. Furthermore, the site would be easily deliverable being in family ownership, access is achievable via the frontage highway, services are available and there are no known constraints or obstacles to delivery. The development of the site would accord with all other LDP2 policies.

In terms of position and relationship to the built form of Hermon, it is acknowledged that the committed site is located towards the centre of the settlement, but the proposed site is nevertheless well related to the built form of Hermon, lying immediately adjacent to the existing settlement boundary and being bordered to the east and north by fairly recent residential development. The development of the site would appear as a logical addition to the street scene and settlement and given the comparable levels to the adjoining developments would not appear intrusive or break the skyline.

In light of the above it is contended that the proposed site should be considered as a supplementary allocation to Hermon, given the services which serve the settlement and its functional link to Crymych, the lack of historic delivery at the committed site and the fact that the proposed site would relate well to the built form of Hermon. Based on the above it is not clear whether the test of deliverability has been satisfied.

#### Sustainability Appraisal assessment in relation to SA Objectives.

SA1: [+]: Provision of housing sites can have positive effects on the population structure, where younger people may stay in the county if there is suitable housing. Site adjoins a recognised Service Village.

SA2: [+]: There is access to open space, facilities and services. Resource efficient dwellings, attractive layout with access to wider countryside and opportunities.

SA3: [0]: The site and SA objectives would be unrelated. However further housing may mean more school places and social cohesion.

SA4: [+]: The site adjoins Hermon in a sustainable location near services, close to public transport links and a footpath link would be provided from the site to the centre of the village.

SA5: [+]: Affordable housing would be provided.

SA6: [+]: This site is well located for access to services and will make a positive contribution to this objective.

SA7: [0]: Neutral but possibly positive depending on occupiers of dwellings- culturally sensitive area due to proportion of Welsh Speakers.





SA8: [0]: Construction can provide employment.

SA9: [+]: Local supply chains during construction and occupation can help support and retain services and support a diverse local economy.

SA10: [+]: Policies on design would ensure development incorporates resource efficient and climate responsive design.

SA11: [0]: The site is unlikely to impact on air quality, although car usage is likely to increase.

SA12: [+]: New development would increase waste products. Policies would need to ensure that development has no significant adverse impact on the water environment.

SA13: [+]: Policies will ensure the sustainability of all aspects of the development. Policies which include water conservation, sustainable drainage and design will be incorporated in the LDP2.

SA14: [+]: Measures would need to be taken to ensure that pollution is minimised, including policies in the LDP to guide developments.

SA15: [+]: Designs will need to ensure that any drainage infrastructure does not place undue pressure on surface water. The site is not located within a flood zone and TAN 15 addresses the issues of flooding and development.

SA16: [+]: The site is adjacent existing development within the area. Design policies will ensure the layout, land use and density of the development would be efficient.

SA17: [0]: The site is improved grassland, but well related to the built form of the settlement, and a comparatively small area.

SA18: [+]: Policies will exist to ensure that the biodiversity resource is protected and enhanced. Hedgerows would be retained and enhancing biodiversity will be a key element of policy.

SA19: [0]: Designs would need to ensure that the landscape is not adversely impacted and this site is considered to relate well to existing built areas. Policies will exist to ensure that the biodiversity resource is protected and enhanced. Hedgerows will be retained and enhancing biodiversity will be a key element of policy. The site is unlikely to impact on the landscape or geological heritage.

SA20: [+]: Policies on design will ensure development has regard to local distinctiveness and contributes positively to the local context and is appropriate to the local character.

SA21: [0]: Adverse impact upon built heritage or historic environment unlikely given context of site and proximity to built form of Hermon, but assessment at application stage would manage issue.

Overall assessment, potential changes and recommendations:

The site relates well to Hermon and provides opportunity for sustainable growth.

**ENCLOSURES:**

Site location, Indicative layout RevA, DCWW correspondence, Western Power Correspondence



<p><i>Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.</i></p> <p>Tick here if you are submitting additional material to support your representation.</p>	✓
<p><b>6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?</b></p> <p><i>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.</i></p> <p><b>6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?</b></p> <p>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.</p>	
<p><i>Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.</i></p> <p>I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.</p>	✓
<p><i>Rwyf am siarad mewn sesiwn gwrandawriad.</i></p> <p>I want to speak at a public hearing.</p>	
<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></p> <p>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><b>9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</b></p> <p><b>9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</b></p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i></p> <p>I wish to be heard in Welsh.</p>	

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

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



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

I wish to be heard in English.





## 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.

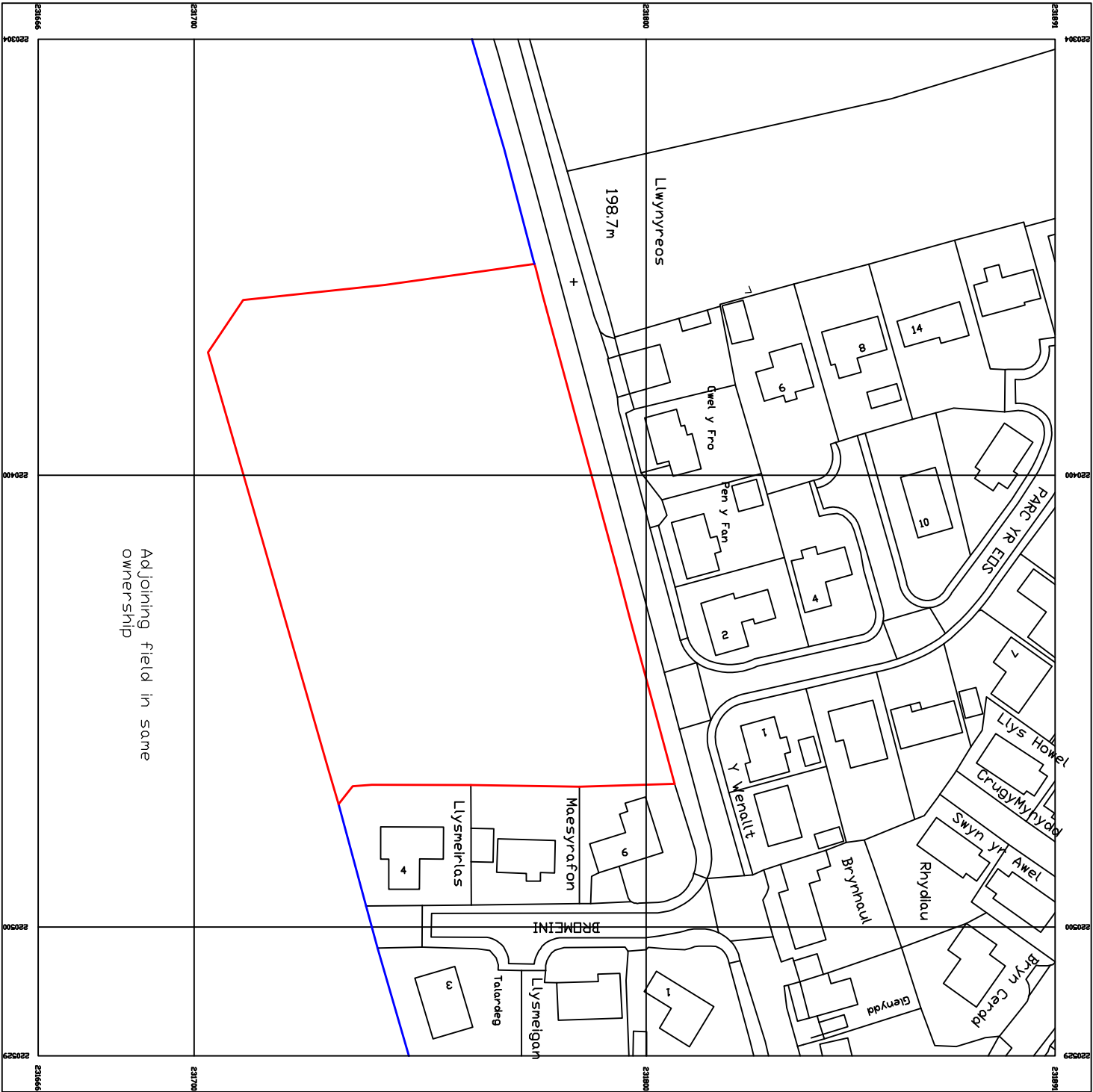
Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.

0 5 10 20 30 40 50  
metres

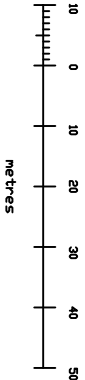
1:1250

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Any discrepancies must be reported to the Agent. If in doubt, ask.  
Site Location and Indicative Planning Stage Drawing Only. Do not scale.

Drdrance Survey  
Ukmappcentre.com



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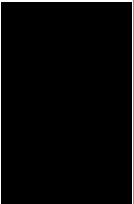


Notes

Amendment	Date	Rev

Drawing Status  
LDP Candidate Site Proposal

Client



Site  
Land west of Bromelini,  
Herron,  
Pembrokeshire,  
SA360EB.

Drawing Title  
Site Location Plan 1:1250

Scale	Size	Drawn	Date
As Shown	A3	RLE	8/8/2018
Dwg No	1820-Lot1		Rev



01/08/2018

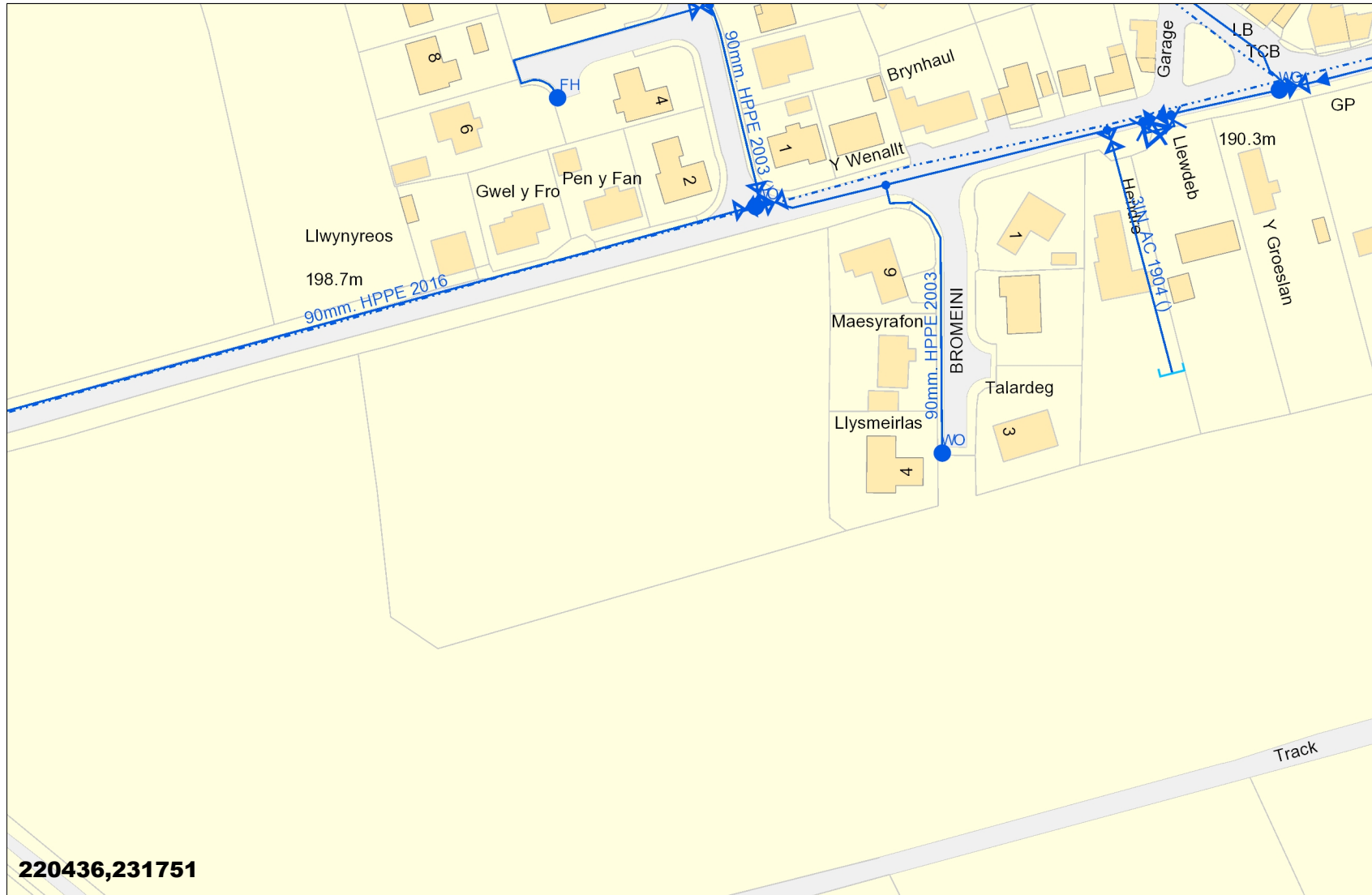
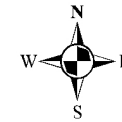
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**220436,231751**

**EXACT LOCATION OF  
ALL APPARATUS TO  
BE DETERMINED ON  
SITE**

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be Asbestos Cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation



**LEGEND**

**Clean Water**

- Sluice Val
- Air Val, SINGLE
- Tap
- Pressure Reducing Valve
- Meter
- BULK Meter
- FH
- Cap
- Existing Main
- NON COMPANY

**Sewerage External**

- Foul
- Surface Water
- Combined
- Rising Main
- Private
- Treatment Works
- Pumping Station
- Special Purpose
- Unknown End
- Change, Combined Overflow
- Outfall, FOUL
- Lamp Hole, Foul
- Private Sewer Transfer
- Lateral Drain
- Inspection Chamber

**220436,231751**

Dŵr Cymru Cyfyngedig ('the Company') gives this information as to the position of its underground apparatus by way of general guidance only and on the strict understanding that it is based on the best information available and no warranty as to its correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus and any onus of locating the apparatus before carrying out any excavations rests entirely on you. The information which is supplied hereby the company, is done so in accordance with statutory requirements of sections 198 and 199 of the water industry Act 1991 based upon the best information available and in particular, but without prejudice to the generality of the foregoing, it should be noted that the records that are available to the Company may not disclose the existence of a drain sewer or disposal main laid before 1 September 1989, or if they do, the particulars thereof including their position underground may not be accurate. It must be understood that the furnishing of this information is entirely without prejudice to the provision of the New Roads and Street Works Act 1991 and the company's right to be compensated for any damage to its apparatus.

**EXACT LOCATION OF  
ALL APPARATUS TO  
BE DETERMINED ON  
SITE**

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Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be Asbestos Cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation.

E.N and V.A Jones

Date: 01/08/2018

Our Ref: [REDACTED]

Dear Sir/Madam,

**Grid Ref: 220413, 231754**

**Site Address: Land west of Bromeini, Hermon, Glogue**

**Development: Residential development up to 23 houses**

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

### **SEWERAGE**

The foul flows only from the proposed development can be accommodated within the public sewerage network. We advise that the flows should be communicated with to the foul only sewer at manhole SN20316802 located on the main road approximately 240 meters east of the development site. We have no foul sewer mapped closer to the development site on the main road of which is nearer than the above specified connection point. However there may be foul assets located nearer to the site that could be used for a new connection for the development of which we do not currently have records of. In order to establish this, we offer a sewer trace service of which can be arranged by contacting our Developer Services Team on 0800 917 2652.

Should a planning application be submitted for this development we will seek to control these points of communication via appropriate planning conditions and therefore recommend that any drainage layout or strategy submitted as part of your application takes this into account. However, should you wish for an alternative connection point to be considered please provide further information to us in the form of a drainage strategy, preferably in advance of a planning application being submitted.



With reference to the surface water flows from the proposed development, surface water should be discharged by sustainable means. We refer you to the Welsh Government 'Recommended non-statutory standards for sustainable drainage (SuDS)' of which there are four levels of sustainable surface water disposal methods outlined in a hierarchical approach (including rain water harvesting, infiltration, watercourses etc). Any future drainage scheme for the development site should include the implementation, where possible, of these sustainable drainage methods for surface water disposal. You are also advised that the development is located within an area served by a foul-only sewer and therefore we would not be able to accept surface water into this asset under any circumstance. Please also refer to further detailed advice relating to surface water management included in our attached Advice & Guidance note.

In addition, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system. You may need to apply to Dwr Cymru Welsh Water for any connection to the public sewer under Section 106 of the Water Industry Act 1991. However, if the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption" - 7th Edition. Further information can be obtained via the Developer Services pages of [www.dwrcymru.com](http://www.dwrcymru.com)

You are also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

## **SEWAGE TREATMENT**

The proposed development would overload the Waste Water Treatment Works. No improvements are planned within Dwr Cymru Welsh Water's Capital Investment Programme.

If you wish to progress this development then it will be necessary for a feasibility study to be undertaken on the Wastewater Treatment Works at the developer's expense. The conclusion of this study will determine any improvement works required.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.  
Mae Dwr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in  
Welsh and English

Dŵr Cymru Cyf, a limited company registered in  
Wales no 2366777. Registered office: Pentwyn Road,  
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y  
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng  
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn  
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

The costs for undertaking this study must be paid for by the developer. For you to obtain a quotation for the feasibility study, we will require a fee of £250 + VAT to engage our consultants, this fee is non-refundable.

## **WATER SUPPLY**

A water supply can be made available to service this proposed development.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at [developer.services@dwrcymru.com](mailto:developer.services@dwrcymru.com)

Please quote our reference number in all communications and correspondence.

Yours faithfully,



**Owain George**  
**Planning Liaison Manager**  
**Developer Services**

***Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.***

# PLANNING AND NEW DEVELOPMENT

## Pre-Planning Advice & Next Steps

Dŵr Cymru Welsh Water has a key role to play in the town and country planning process as the services provided are at the forefront of public health and protection of the environment.

Our engagement in the planning process allows us to ensure that we can suitably service new development from a clean water and sewerage treatment perspective, but also provides us with the controls to enable us to mitigate any potential negative impact that new development is likely to have on the performance of our infrastructure, the service we provide to customers, and the wider environment. Crucially, the planning process also enables us to identify where new development and growth is planned so that we are able to target investment in our existing infrastructure within these areas.

### Our Pre Planning Advice to you

You have now received our pre-planning advice which will provide you with information regarding the impact of your proposed development upon our assets and apparatus. Our letter will advise whether the local network can support the proposal, whether off-site water mains and/or sewers will need to be provided, and whether there are any apparatus located within the land you wish to develop and the requirements for these apparatus.

However, in some circumstances we may require further information from you to fully evaluate the impact of your development. If this is the case please proceed to submit the required detail as requested in the letter. Upon receipt of the

information we can consider our position and provide you with an updated pre-planning response.

Please note that the advice provided is valid for a period of 12 months from the date of issue and will help us inform our response to the planning application for the development.

### Next Steps....

You may now be proceeding to submit your planning application to the Local Planning Authority. Our preference is to see that drainage matters are resolved at pre-planning stage which will allow us to provide positive comments at planning consultation stage. In light of our pre-planning advice to you, it may therefore be in your interest to:

- Consider the drainage requirements and how the installation of new water mains/ sewers shapes the layout of your development. You will need to ensure that the design of the drainage layout will (where relevant) meet the appropriate standards for formal adoption by us (see further advice provided overleaf regarding Connecting to our Networks)
- Consider how your site layout ensures that any assets/ apparatus that may be located at the site are protected in line with the requirements set out in our letter
- Submit further information and/ or drainage plans so that we can review your proposal in greater detail
- Where further assessments are recommended, to commission those before the planning

application is submitted to avoid any delays (see further advice provided overleaf on Network Modelling/WwTW Feasibility Studies)

- Provide a copy of our pre-planning enquiry response to the Local Planning Authority as part of your planning application submission to demonstrate you have considered drainage aspects of your development at pre-application stage, and that we are aware of your proposal.

### Our Involvement in the Planning Application Process

We provide Local Planning Authorities with advice on the ability of our assets to accommodate proposed development. Our comments are crucial in providing comfort to the Local Authority that new development sites can be effectively drained and can be supplied with clean water.

When sites can be accommodated in our networks we will recommend drainage related planning conditions which may seek to control the point of communication with our networks and the type of discharges that we may permit. We may also recommend conditions to secure the submission of further details, such as drainage plans and strategies (please note that we will resist the physical communication to our networks until drainage related conditions have been discharged)

However, there are instances where further assessments are required and we will seek to work collaboratively with you and the Local Planning Authority to establish a positive outcome for all parties.

# PLANNING AND NEW DEVELOPMENT

## General Advice and Guidance

Our pre-planning response will provide advice dedicated to your development. However, we also offer the following general advice around drainage matters and communicating to our networks.

### Managing Surface Water at your Development Site

As with all new development sites, you will need to consider how to deal with the surface water runoff from new buildings and hard standings. Traditionally, surface water has been managed by installing new pipes and large storage tanks to take flow away from land as quickly as possible. However, Dŵr Cymru actively encourage the use of Sustainable Urban Drainage Systems (SUDS), which is an approach to managing surface water run-off by imitating natural drainage systems and retaining water on or near the site.

SUDS involve a range of techniques including green roofs, rainwater harvesting, permeable pavements, etc. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. The variety of SUDS techniques available means that virtually any development should be able to include a scheme based around these principles. Good justification would be required not to incorporate a SUDS scheme on the site.

All new developments will therefore be expected to consider surface water management techniques and

fully exhaust all technical options outlined under Sections 3.2 and 3.4 of Part H of the publication 'Building Regulations 2000'. These regulations ensure that disposal should be made through the hierarchical approach, preferring infiltration and, where infiltration is not possible, disposal to watercourses in liaison with the Land Drainage Authority and/or Natural Resources Wales or the Environment Agency in England. Discharge of surface water to the public sewer is only to be made as a last resort. The management of highway or land drainage run off will also need to be considered as these flows will not be allowed to discharge directly or indirectly into the public sewerage system.

### Network Hydraulic Modelling/ WwTW Feasibility Studies

Our pre-planning advice will provide you with an indication of whether our networks can accommodate your development. However there may be instances where our assets cannot at present service your site.

Our aim is to support economic development and growth within our operational area and we do not want to resist new development where possible. However we must be mindful of our assets, existing customers and the environment. In areas where there are issues either on our network or at the Wastewater Treatment Works (WwTW), we may already have proposals in place to address these concerns and to create capacity within the network for new developments.

However, there may be instances where you intend to develop your site in advance of Dŵr Cymru

undertaking improvements. If this is the case, to ensure there is no detriment to our existing customers you may be required to implement solutions identified by an assessment of either the network or Wastewater Treatment Works. Please note that you will not be expected to resolve any operational issues that exist.

Where further assessments are recommended, please be advised that you will need to allow sufficient time in your development program for these studies to be undertaken and for any improvements to be implemented, as in some circumstances we will not permit a communication to our networks until these works are completed.

Where possible, we will seek to control the delivery of any solutions as part of the planning process. Dependent on the progress of the assessment, we may be in a position to recommend appropriate planning conditions so that the outcomes of the assessment can be delivered as part of any planning permission. This approach allows us to support the progression of the site through the planning process, however in the absence of a completed assessment and known solutions we may need to work with you and the Local Planning Authority until the assessment is completed and the outcomes are known.

# PLANNING AND NEW DEVELOPMENT

## Making Connections to our Networks

### Installing Your Drainage System and Making Connections to the Public Sewer

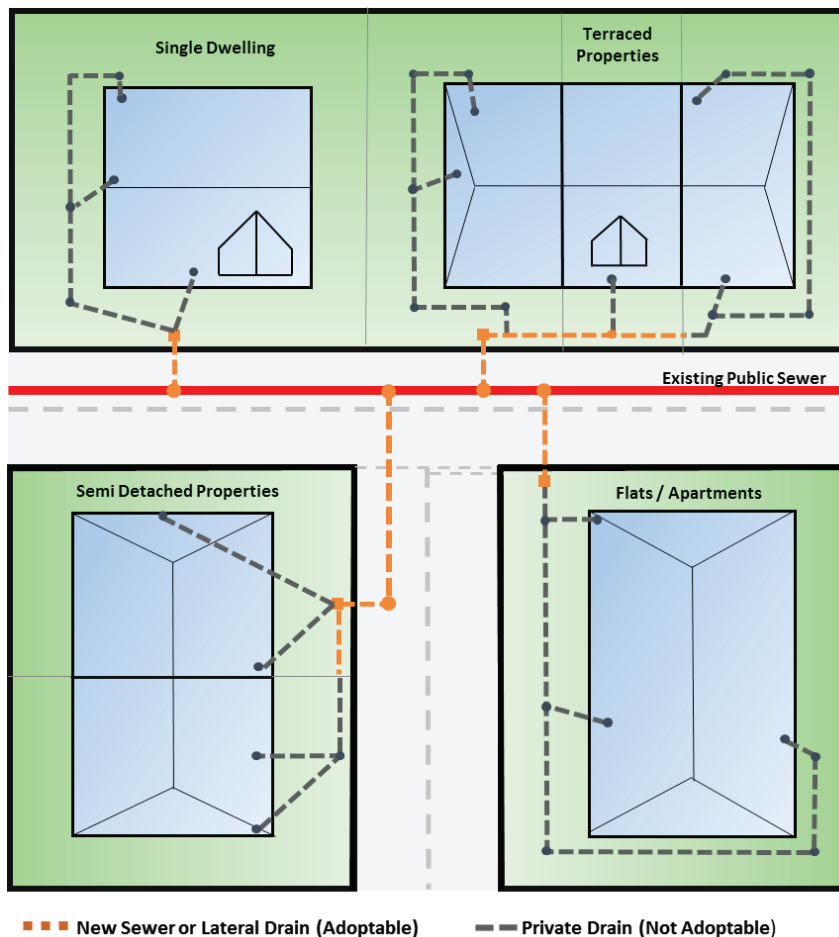
You will need to apply to us to make a connection to the public sewer, and depending on the layout of the drainage system you are proposing for your site, you may also be required to enter into an Adoption Agreement with us.

If your connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991) with us.

The design of the sewer and lateral drain must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition.

Please be advised that we will not enter into a sewer adoption agreement for any sewer or lateral drain which is constructed in advance of the adoption agreement being in place. Further information on whether you will require a Section 104 Adoption Agreement and the adoption process can be obtained by contacting us.

To make the physical communication to the public sewer you will need to apply under Section 106 of the Water Industry Act 1991. An application pack can be obtained from our website and as part of the submission you will need to demonstrate that an adoption



agreement (if applicable) is in place, and that you have the relevant planning permissions in place for your development. Please be advised that if your site is subject to an Adoption Agreement we will not permit your communication until the agreement is in place.

### Your New Water Supply

Our pre-planning advice will indicate whether your site can be adequately serviced by our clean water network. If new connections are required, we would invite you to submit an application to us at [www.dwrcymru.com](http://www.dwrcymru.com) under Developer Services. Here you will find information about the services we have available and all

our application forms and guidance notes. You can complete forms online and also make payments via our website.

Upon approval of your Application and Water Regulations Notification we will notify you accordingly, send you a quotation for our estimated cost of your connection and a plan advising you of the work you need to carry out.

Our quotation is valid for 6 months. If payment is not received during this period you will need to re-submit a new application plus application fee if you wish to continue.

# PLANNING AND NEW DEVELOPMENT

## Requisitions and Asset Protection



### Requisition a Water Main or Public Sewer

As the Statutory Water and Sewerage Undertaker we have a duty under the Water Industry Act 1991 to comply with a Requisition Notice served on us for the provision of a water main and/or public sewer to serve the development site.

Two main reasons exist for the person(s) exercising the rights to serve Notice. The first is where a person(s) wishes us to lay water mains and/or sewers in private land (by us serving Notice under Section 159 (WIA91) so that a communication with an existing watermain or public sewer can be achieved; the second is where, as a consequence of the provision of the new watermain/public sewer, reinforcement of the existing network is required to ensure that the development, and the local area, has an effective system (refer to Section 37 (water) and Section 94 (sewers) of the Water Industry Act 1991)

Under the provisions of the WIA 1991, we are entitled to recover the costs we incur in providing a requisitioned watermain or sewer. This includes, among other things, the reasonable costs of design, labour, plant, materials, reinstatement, land purchase (if applicable), compensation, and quality testing, inspection, supervision, administration and overhead costs.

Further information on the Requisition process can be obtained by contacting our team of dedicated Engineers or by visiting the Developer Services pages of our

website.

### Assets Located at your Development Site

Our pre-planning advice letter may have drawn your attention to assets and/or apparatus located within your development site. It is important to note that under section 159 of the Water Industry Act 1991, Welsh Water has rights of access in order to inspect, maintain adjust repair or alter any asset or apparatus at all times.

### Locating an Asset

Our pre-planning letter will be accompanied by water main and sewer extract plans, providing you with an indication of the asset location within the site. However, we provide this information as general guidance only and on the strict understanding that it is on the best information available (see notes within our plans for further information). The onus of locating the apparatus before carrying out any excavation rests entirely with you. To accurately locate any assets, please contact our team of planning officers for further guidance.

### Protecting an Asset

The presence of an asset within the development site will have an impact on the layout and general arrangement of the site. Our pre-planning advice letter will provide you with the requirements for the protection of the asset(s) and you will need to ensure that the layout incorporates these requirements. Our recommendation is that our assets are incorporated into any site layout plan that is submitted as part of any planning application, so that

we and the Local Planning Authority can be satisfied that you have acknowledged the presence of such assets and have taken the necessary steps to protect them at the site.

### Diverting a Water Main or Public Sewer

If you have concluded that the asset located within the site could not be incorporated within the layout of the new development, or our rights of access to the asset may be hindered by your proposal, you may request the alteration or removal, including diversion of that apparatus to accommodate a proposed improvement of that land (e.g. development or change of use). This provision is provided under Section 185 of the Water Industry Act 1991. Further information on diverting an asset can be obtained by contacting our team of dedicated Engineers or by visiting the Developer Services pages of our website.

### Contact Us

For more information, contact Welsh Water's Planning team:

Email: [developer.services@dwrcymru.com](mailto:developer.services@dwrcymru.com)

Visit: [www.dwrcymru.com](http://www.dwrcymru.com)

Tel: 0800 917 2652



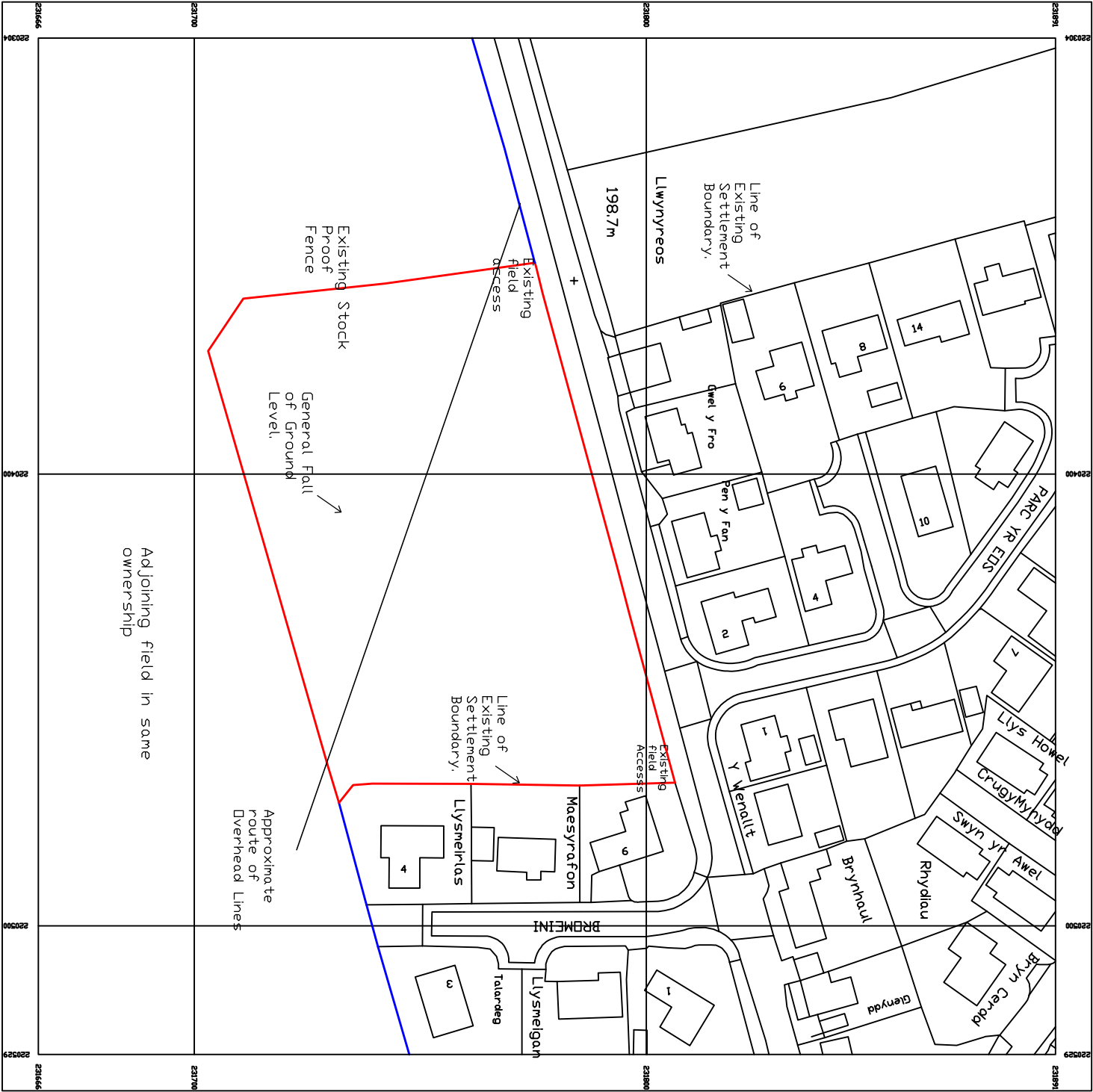
Notes

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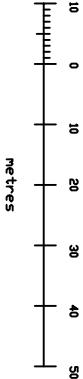


Drondance Survey  
ukmapcentre.com

INDICATIVE LAYOUT PLAN  
ONLY, BASED ON O.S 1:1250  
BUT NOT DRAWN TO A  
RECOGNISED SCALE.



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Amendment	Date	Rev

Drawing Status	Deposit LDP2 Suggestion
Client	

Site	Land west of Bromeini, Herron, Pembrokeshire, SA360EB.
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Drawing Title		Site Context Plan 1:1250 Indicative Layout Plan NTS		
Scale	Size	Drawn	Date	
As Shown	A3	RLE	10/12/2022	
Dwg No	1820-Lo2		Rev A	

## Llyr Evans

---

**From:** [REDACTED]  
**Sent:** 06 August 2018 13:16  
**To:** Llyr Evans  
**Subject:** RE: [REDACTED] and Hermon- Site Visit

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

Hi Llyr

I am unsure what you are requesting but believe you just wish to know if it is possible to divert cables/poles at this stage instead of actually carry out the work? Please correct me if I am incorrect.

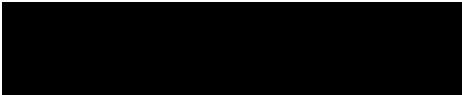
The site in Hermon Glog is very straight forward and with consent of landowners it would be a straight forward diversion to rid the site of all poles and O/H wires. We would look to keep these O/H but bring an U/G LV supply back in to the site.

[REDACTED]

If you require any further information please do not hesitate to get in contact.

Kind regards  
Will James  
Planner

## Western Power Distribution



**WESTERN POWER  
DISTRIBUTION**  
Serving the Midlands, South West and Wales

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**From:** Llyr Evans [mailto:[REDACTED]]  
**Sent:** 01 August 2018 17:37  
**To:** James, William J.  
**Subject:** Cilgerran and Hermon- Site Visit

Mr James,

Further to our telephone conversation earlier, please find attached site location plans and indicative (non-binding) plans for the sites at Hermon and Cilgerran.

If you require any further information, please get in touch.

Diolch,

Llyr