

Nettleship, Tom

From: [REDACTED]
Sent: 13 December 2024 18:05
To: LDP - For Enquiries
Subject: FW: Submission
Attachments: ACC consultation response to LDP 2 Updated 3 (003).docx; 240618 Deposit Plan 2 Comments Form DRAFT (1).doc

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: D Rep

EXTERNAL EMAIL – Exercise care with links and attachments *E-BOST ALLANOL – Byddwch yn ofalus wrth agor dolenni ac atodiadau.*

Good Evening

I attach the Deposit Plan 2 Comments Form and additional information titled ACC consultation response to LDP 2 updated 3. These are comments submitted by Amroth Community Council and relate to issues specific to the wards of Amroth and Crunwere plus Policy GN 56.

Please send confirmation of receipt.

Kind regards
Kathryn

Kathryn Bradbury
[REDACTED]



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	Kathryn Bradbury	
<i>Teitl swydd (lle y bo'n berthnasol)</i> Job title (where relevant)	Clerk and RFO	
<i>Sefydliad (lle y bo'n berthnasol)</i> Organisation (where relevant)	Amroth Community Council	
<i>Cyfeiriad</i> Address	REDACTED	
<i>Rhif ffôn</i> Telephone no	REDACTED	
<i>E-bost</i> Email address	REDACTED	
<i>Llofnodwyd (gallwch teipio)</i> Signed (can be typed)	Kathryn Bradbury	
<i>Dyddiad</i> Date	13-12-2024	



RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

Your name / organisation

Amroth Community Council

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)

Sites 220 and 135 in Llanteg. Policy GN 56 and Rural Facilities Study Report 2020 and 2024 update.

Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran
LDP paragraph or section number(s)

Spatial strategy for Rural Facilities Study appendix 2 pages 24 and 26

Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol
LDP Proposals Map reference(s)

Candidate sites page 42

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.

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

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/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.

Village categorisation based on inaccurate data in Spatial Strategy in Rural Facilities Study 2020 and 2024 update - see Appendix 2, p24 &26

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.	
<i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i> I wish to be heard in Welsh.	
<i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i> I wish to be heard in English.	



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.

LDP 2 Deposit Plan

Comments from Amroth Community Council November 2024

Amroth Community Council submit the following points in response to the LDP 2 Consultation.

1.Llanteg/ Llanteglos

The LDP 2 appears to indicate that these are two settlement. The name of Llanteg does include an area known as Llanteglos which surrounds the property known as Llanteglos on Amroth Road, Llanteg. The settlement/village is called Llanteg.

The LDP 2 also states that the village of Llanteg is to be recategorized as a service village using outdated information from the Rural Facilities Study Report 2018 and the Rural Studies Report 2020/ updated 2024. Amroth Community Council object to this as the settlement does not accrue enough points to be classified as a Service village. The current facilities include

- Shop that requires transport for most residents to reach. **5 points**
- Village Hall – Again, the hall must be accessed by the majority of users by car as it is located on the A477 trunk road with limited pavements/ safe walking. **3 points**
- Common land. The Old School Garden and the Clay Pits which constitute the common land for the village, again access mainly by car due to the rural location. – **1 point**

NOTE; There is no place of worship – the church was closed over 40 years ago, and the pub is also closed at this time.

For these reasons Amroth Community Council request that you review this decision, and recategorize Llanteg as a Local Village based on the facilities available.

2. Summerhill

It should be noted that the points awarded for a public house/club in Summerhill relate to Meadow House Carvan park which is located outside the village boundary.

3. New Inn

Amroth Community Council question why New Inn has been included as a settlement separate to Amroth. The postal addresses of the properties in the New Inn area are all Amroth and residents see it as part of Amroth village. The Amroth village sign on approaching the village from the East is located before the New Inn. Amroth Community Council maintain that New Inn is not separate but very much part of Amroth.

Also the Amroth settlement boundary line appears to dissect a property located in New Inn, Amroth. The house is within the boundary but the adjacent garage is outside. From a planning perspective this could complicate future planning applications. Amroth Community Council request that the whole property is included within the settlement boundary.

4.Ground Source Protection Zone

Amroth Community Council draw your attention to the potential development (candidate) sites in Llanteg that are located fully within a defined Ground Source Protection Zone (GSPZ) for drinking water. This is not referenced within the candidate site assessment.

There is no mains drainage in the village, no year-round running watercourses and clay subsoil that prevents any foul drainage to an extent that cesspit private drainage has been mandated on properties built within the last 20 years. The 'Rural Facilities Survey 2018' and more recent reports should therefore place greater emphasis on the presence of mains sewerage and should also recognise Ground Source Protection zones to avoid an adverse impact and to be compliant with Welsh Water and Natural Resources Wales protection of Water resources.

We therefore ask that sites are reviewed and where they are within the GSPZ **and** that this is reflected within the site evaluation scoring matrix as it is both non-environmentally friendly (and hugely expensive) to have all wastewater removed by tanker every few weeks as is the case for existing properties bordering the proposed development site on Amroth Road, Llanteg.

The requirement for private cesspit drainage, and the space they require will also impact the number of properties to be built on development site 220 within an GSPZ. Planners must be aware of this when considering applications for development. The requirement will also impact the provision of affordable homes on these sites, as those on limited incomes will not afford the cost of frequent tank emptying.

5. GN 56 Caravan, Camping and Chalet development.

The Landscape Character Areas Sensitivity and Capacity Assessments - Landscape Character Area LCA 19, Narberth and Lampeter Vale draws attention to the number of sites in and around the Amroth Community Council wards and states that 'parts have already reached capacity including Pleasant Valley, Summerhill and surrounding areas close to the coast and National Park'.

In recent years, some caravan parks in the area have changed from touring sites to the provision of static caravans or lodges. Evidence shows that there has been no reduction of pitch numbers although the statics and lodges take up more space and can accommodate a greater number of occupants. Expansion into fields previously without pitches has negatively impacted neighbours and the aesthetic from the National Park. Amroth Community Council request that LDP 2 Tourism Policy acknowledges this, accounts for the additional space required and reduces pitch numbers as appropriate.

While current sites and visitors bring a positive impact to the local economy, further development would impact negatively on the enjoyment of the National Park. Amroth Community Council asks that future planning decisions relating to Camping, Caravaning and Chalets development respects this and enforces appropriate screening on current sites.

6. PCC and National Park Planning Policy

The Amroth Community Council area also incorporates the Pembrokeshire Coast National Park on the coast. Councillor's request that planning decisions by PCC and PCNPA are based on consistent Policy, especially in dealing with the provision of holiday accommodation.