

Emma Evans

From: [REDACTED]
Sent: 10 December 2024 16:23
To: LDP - For Enquiries
Cc: David Powell
Subject: Pembrokeshire RLDP - Deposit Plan Representations
Attachments: Professional Written Representations - Land at Haverfordwest - 27.11.2024.pdf; 240618 Deposit Plan 2 Comments Form - Haverfordwest.pdf; Land at Haverfordwest Site Plan.pdf; Landstack Report - Land at Haverfordwest.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: D Rep

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

Dear Sir/Madam

please find attached representations to the Pembrokeshire RLDP consultation. The intention of the representations is to set out an alternative candidate site for proposed inclusion as a draft allocation within the emerging LDP. We shall pick up further discussions with the LDP team in the New Year as to how we can progress further to include this site within the RLDP proposals.

Should you have any queries in the interim, please don't hesitate to contact me.

Kind regards

Stuart



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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)

Enw Name	Mr Lyn Morgan	Mr Stuart Leaver
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)	Owner	Associate Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		Powells (Site Promoter)
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		



Llofnodwyd (gallwch teipio) Signed (can be typed)	Stuart Leaver
Dyddiad Date	10th December 2024
RHAN B: Eich sylw PART B: Your representation	
Eich enw / sefydliad Your name / organisation	Stuart Leaver – Powells on behalf of our client Mr L Morgan
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)	RLDP document generally
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)	
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.	✓



<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i> I think that the procedural requirements have not been met.</p>		
<p>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>? <i>Ticiwch <u>bob un</u> sy'n berthnasol.</i></p> <p>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph? Tick <u>all</u> that apply.</p>		
<p><i>Dyraniad safle newydd</i> New site allocation</p>		✓
<p><i>Polisi newydd</i> New policy</p>		✓
<p><i>Paragraff neu destun ategol newydd</i> New paragraph or supporting text</p>		
<p>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).</p>		
<p><i>Enw'r safle</i> Site name</p>	<p>Land at Haverfordwest (As per the enclosed representations)</p>	
<p><i>Cyfeiriad y cais</i> Site reference</p>	<p>Not previously submitted.</p>	
<p><i>Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.</i></p> <p>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.</p>		



5. Rhestrwch eich sylwadau isod.

Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/profion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.

Tick here if you are submitting additional material to support your representation.



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.

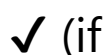
6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

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.

Rwyf am siarad mewn sesiwn gwrandawriad.



(if



I want to speak at a public hearing.	required)
<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>	
Propsoed alternative candidate site at Hook	
<p>9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</p> <p>9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i></p> <p>I wish to be heard in Welsh.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i></p> <p>I wish to be heard in English.</p>	✓



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.



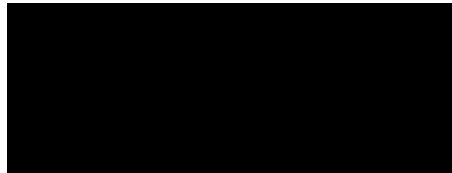
Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.

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.

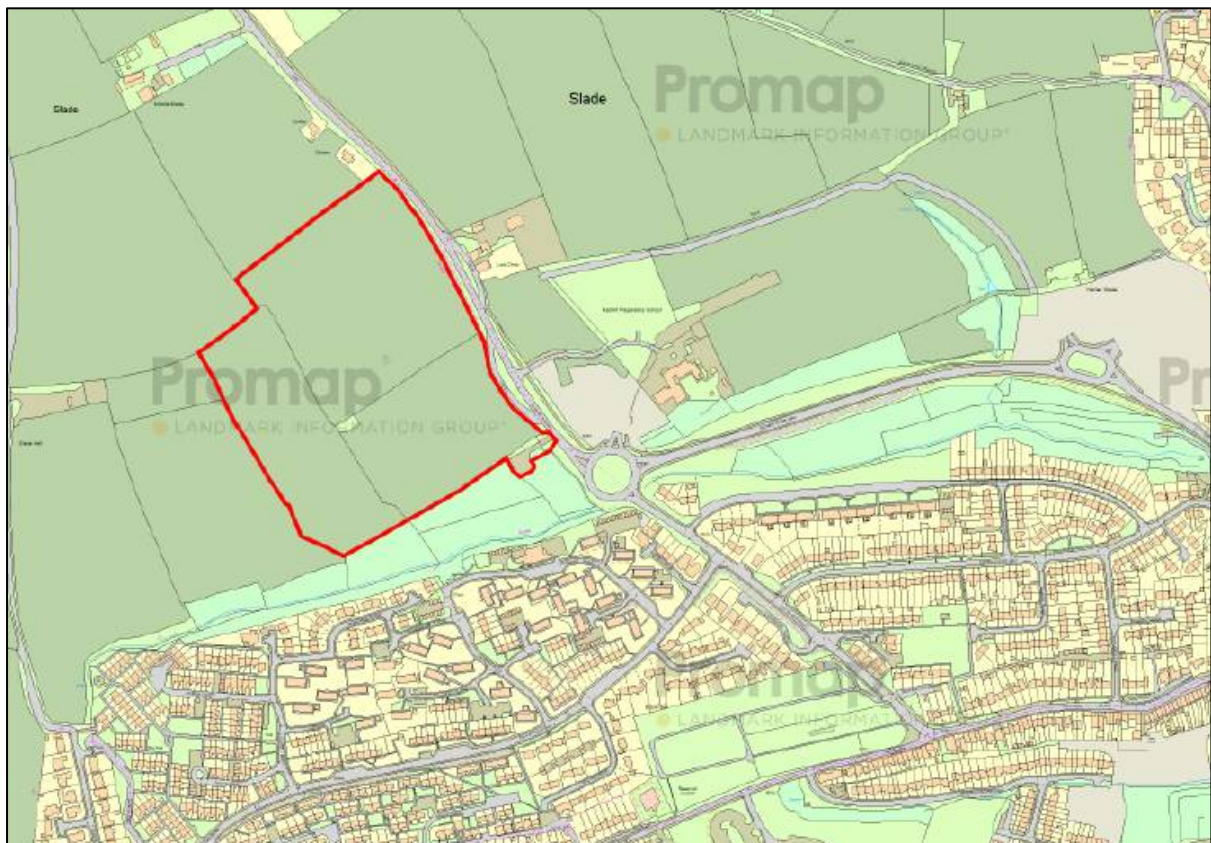
Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many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

Professional Written Representations: Proposed Alternative Site of 21.44 Acres of Land at St David's Road, Haverfordwest including Sustainability Appraisal



On Behalf of:

Mr L Morgan



November 2024

Introduction

These representations are made in respect of the Draft Local Development Plan (LDP) for Pembrokeshire. This submission provides comments on the current draft, proposing the 21.44-acre site at St David's Road, Haverfordwest, as a more suitable alternative to some of the allocated sites for residential development. As one of the main settlements in the authority area, Haverfordwest is a highly sustainable location for future growth. This representation highlights the site's deliverability, sustainability, and alignment with LDP objectives, making the case for its allocation in place of less suitable options.

Assessment of the Draft Plan

The Draft LDP identifies the need for new residential development to meet both market and affordable housing demand across Pembrokeshire. However, some of the proposed allocations within the draft plan present significant concerns regarding their suitability and ability to deliver sustainable growth effectively.

Key concerns with the draft plan include:

- **Reliance on Constrained Sites:** Several allocated sites in the draft plan face considerable challenges, such as inadequate infrastructure, environmental constraints, or complex land ownership issues. For example, some sites may require significant investment in utilities or transport links, while others face opposition due to environmental designations or ecological sensitivities. These factors not only increase the financial burden of development but also lead to delays in delivering housing, potentially causing the Council to miss key targets outlined in the LDP. The reliance on such sites undermines the overall deliverability of the plan and risks failing to meet housing needs in a timely manner.
- **Underutilisation of Haverfordwest's Strategic Role:** As Pembrokeshire's principal settlement, Haverfordwest is uniquely positioned to accommodate a significant proportion of the county's housing growth. Its established infrastructure, access to services, and central location make it a prime candidate for more substantial allocations. The current draft fails to leverage this potential fully, focusing instead on less suitable locations.
- **Insufficient Policy Alignment:** The current allocations do not adequately reflect key planning policies within the LDP, such as the emphasis on concentrating growth in sustainable locations or prioritising areas with existing infrastructure. This inconsistency undermines the plan's overall strategy and reduces its effectiveness in meeting countywide objectives.
- **Limited Addressing of Housing Needs:** The proposed allocations are insufficient to meet the rising demand for both market and affordable housing in Haverfordwest. The omission of suitable and deliverable alternatives, such as the St David's Road site, risks exacerbating the housing shortfall in the county's main settlement.

Proposal for Inclusion of the Site

The 21.44-acre site at St David's Road, Haverfordwest, represents a highly sustainable and logical alternative to less suitable allocated sites. Its allocation would better support the strategic objectives of the LDP by delivering housing in a sustainable, deliverable, and accessible location. Key attributes of the site include:

1. Deliverability:

- The site is immediately available for development, with no significant physical or environmental constraints. This ensures timely delivery of much-needed housing within the plan period, mitigating risks associated with delays.
- Proximity to existing road networks and utilities enables straightforward infrastructure connections, reducing costs and increasing the feasibility of development.
- The site's readiness positions it as a realistic alternative to constrained locations, ensuring housing targets can be met efficiently.

2. Sustainability:

- Haverfordwest, as a main settlement, offers unparalleled access to a wide range of employment opportunities, educational institutions, healthcare facilities, retail centres, and leisure amenities. Development in this location ensures residents can access essential services with ease.
- The site's location supports active travel, such as walking and cycling, by connecting to existing pathways and proximity to core services. This aligns with the principles of sustainable living and reduces dependency on private vehicles.
- Sustainable commuting patterns are further supported by the settlement's existing public transport links, enhancing connectivity for future residents.

3. Alignment with LDP Objectives:

- Allocating this site directly supports the LDP's core objective to focus growth in sustainable locations, particularly those that are well-serviced and infrastructure-ready.
- The development would reinforce Haverfordwest's role as the primary settlement, supporting its continued economic and social vibrancy. This is critical for the balanced distribution of housing and services across Pembrokeshire.
- Delivering a mixed housing development on this site complements the broader LDP strategy by addressing both immediate housing needs and long-term sustainability goals.

4. Environmental Considerations:

- Situated outside designated flood risk areas, the site avoids challenges associated with climate resilience, ensuring that the development is future-proofed against adverse weather conditions.

- Thoughtful design can incorporate biodiversity enhancements, such as wildlife corridors, native planting, and green infrastructure, fostering ecological benefits alongside urban growth.
- The site offers opportunities for seamless integration into the existing urban fabric, maintaining the aesthetic and character of Haverfordwest while addressing housing requirements.

Justification for Allocation

The inclusion of this site within the LDP would:

- **Provide a More Deliverable Alternative:** The site's readiness for development, combined with its absence of significant constraints such as environmental or infrastructure challenges, makes it a reliable option. Unlike other constrained allocations, this site offers immediate potential for housing delivery within the plan period, reducing the risk of underperformance against housing targets.
- **Address Housing Needs:** Haverfordwest faces growing demand for both market and affordable housing, as identified within the LDP. This site's scale allows it to provide a diverse housing mix that supports socio-economic inclusivity and aligns with the plan's objectives to address affordability issues. Its development would directly contribute to meeting the county's housing targets.
- **Support Sustainable Development:** Positioned within Haverfordwest, the site maximises the use of existing infrastructure, including transport links, utilities, and public services. This alignment with sustainable planning principles ensures minimal environmental impact while fostering active travel and reducing reliance on private cars. The development can also incorporate green infrastructure to enhance biodiversity and promote environmental stewardship.
- **Maximise Strategic Growth Potential:** Haverfordwest's designation as Pembrokeshire's primary settlement underpins its role as a focus for strategic growth. Allocating this site leverages the town's infrastructure and central position, ensuring balanced growth across the county. The site's development would strengthen Haverfordwest's function as a service and employment hub while contributing to its long-term sustainability.

Conclusion

The 21.44-acre site at St David's Road, Haverfordwest, is a highly sustainable and deliverable alternative to some of the constrained sites currently allocated in the draft LDP. Its allocation within the emerging LDP would address critical housing needs while supporting the strategic objectives of the plan. These representations respectfully request that the site be allocated as a residential development site within the Local Development Plan to ensure Pembrokeshire's sustainable growth and development.

Appendix 1

Sustainability Appraisal: 21.44 Acres of Land at St David's Road, Haverfordwest

Introduction

A sustainability appraisal is a structured evaluation process designed to assess the potential environmental, social, and economic impacts of proposed developments. It ensures alignment with sustainable development principles and helps identify opportunities to support balanced growth while protecting natural resources and community well-being. This appraisal focuses on the 21.44-acre site at St David's Road, Haverfordwest, proposed for residential development, evaluating its potential contribution to sustainable town planning and its alignment with the objectives of the Local Development Plan (LDP).

Site Context

- **Location:** The site is located on the northern edge of Haverfordwest, strategically positioned to integrate seamlessly with the existing urban fabric. It is bordered by established residential neighbourhoods, making it a natural extension of the settlement. The site's positioning ensures minimal disruption to the surrounding area while creating opportunities to enhance connectivity and infrastructure.
- **Proposed Use:** The site is proposed for residential development, with the capacity to deliver a balanced mix of market and affordable housing. This mix will meet local housing needs, particularly addressing affordability challenges while promoting a diverse and inclusive community. Its scale also allows for comprehensive master planning to ensure high-quality, sustainable design.
- **Settlement Role:** Haverfordwest serves as the administrative and commercial heart of Pembrokeshire, making it an ideal focal point for strategic growth. The town's existing infrastructure—including healthcare, education, retail, and employment opportunities—provides a robust foundation to support new development. Additionally, its excellent transport links, including proximity to the A40 and public transport hubs, position it as a highly sustainable location for residential expansion. This aligns with the Local Development Plan's goals of concentrating growth in key settlements to maximise resource efficiency and service accessibility.

Sustainability Factors

1. Accessibility:

- The site's proximity to Haverfordwest town centre ensures residents will have easy access to a wide range of services, including retail, healthcare, and education.
- The site is well-connected to the regional transport network, including road links and public transport options, reducing reliance on private vehicles and supporting sustainable commuting patterns.

- Active travel options, such as cycling and walking, are supported by existing and proposed pathways that connect the site to key destinations.

2. Housing Need:

- The LDP identifies a pressing need for both market and affordable housing in Pembrokeshire. This site provides an opportunity to deliver a diverse housing mix that addresses local demand while supporting socio-economic inclusivity.
- As Pembrokeshire's primary settlement, Haverfordwest is well-suited to accommodate significant growth without overburdening infrastructure or services.

3. Transport and Active Travel:

- The site's location near major roadways ensures efficient vehicular access while minimising congestion.
- Its integration into the public transport network will enable residents to travel sustainably, connecting them to employment hubs, educational facilities, and healthcare services within the region.
- Proposed enhancements to pedestrian and cycling routes will further encourage active travel, reducing emissions and promoting healthier lifestyles.

4. Environmental Considerations:

- The site is situated outside designated flood risk areas, ensuring resilience to climate-related challenges.
- Development can incorporate green infrastructure, such as wildlife corridors, native planting, and sustainable drainage systems, to enhance biodiversity and mitigate environmental impacts.
- The location avoids ecologically sensitive areas, allowing for responsible development that aligns with environmental policy objectives.

5. Economic and Social Impact:

- The development would support the local economy by creating construction jobs and boosting spending in local businesses.
- The increase in population would strengthen the viability of existing services and amenities in Haverfordwest, ensuring the town's continued role as a regional hub.
- Provision of affordable housing would address socio-economic inequalities and support community cohesion.

Key Arguments for Allocation

- **Deliverability:** The site is unconstrained by significant environmental or infrastructure challenges, ensuring prompt and efficient delivery of housing within the plan period.

- **Sustainability:** Its location within Pembrokeshire's principal settlement ensures alignment with sustainable planning principles, including proximity to services, active travel, and public transport.
- **Alignment with LDP Objectives:** Allocating the site supports the LDP's goals of focusing growth in sustainable locations and meeting housing needs in a balanced and responsible manner.
- **Support for Strategic Growth:** The development would reinforce Haverfordwest's position as a key settlement, promoting economic, social, and environmental resilience.

Conclusion

The 21.44-acre site at St David's Road, Haverfordwest, represents a highly sustainable and deliverable opportunity for residential development. Its inclusion in the emerging Local Development Plan would address critical housing needs while supporting the strategic objectives of the plan. This appraisal strongly recommends the site's allocation to ensure Pembrokeshire's growth is both balanced and sustainable.

PHE276 site plan



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Landstack

LAND ON THE EAST SIDE OF St Davids Road, Haverfordwest

|

Site Report

Content



Title and Contents



General Information



Site Plan

Satellite

OSM



Planning Data

Planning Apps

Allocations

SHLAA

Minor Apps



Constraints



Land Registry

Land Owner Info



Comparable Data

Average

All Data



Local Authority Info

General Information

General Information

District	Pembrokeshire
Size(ha)	10.351
Size(a)	25.578
Units	306 (approx)
Address	LAND ON THE EAST SIDE OF St Davids Road, Haverfordwest

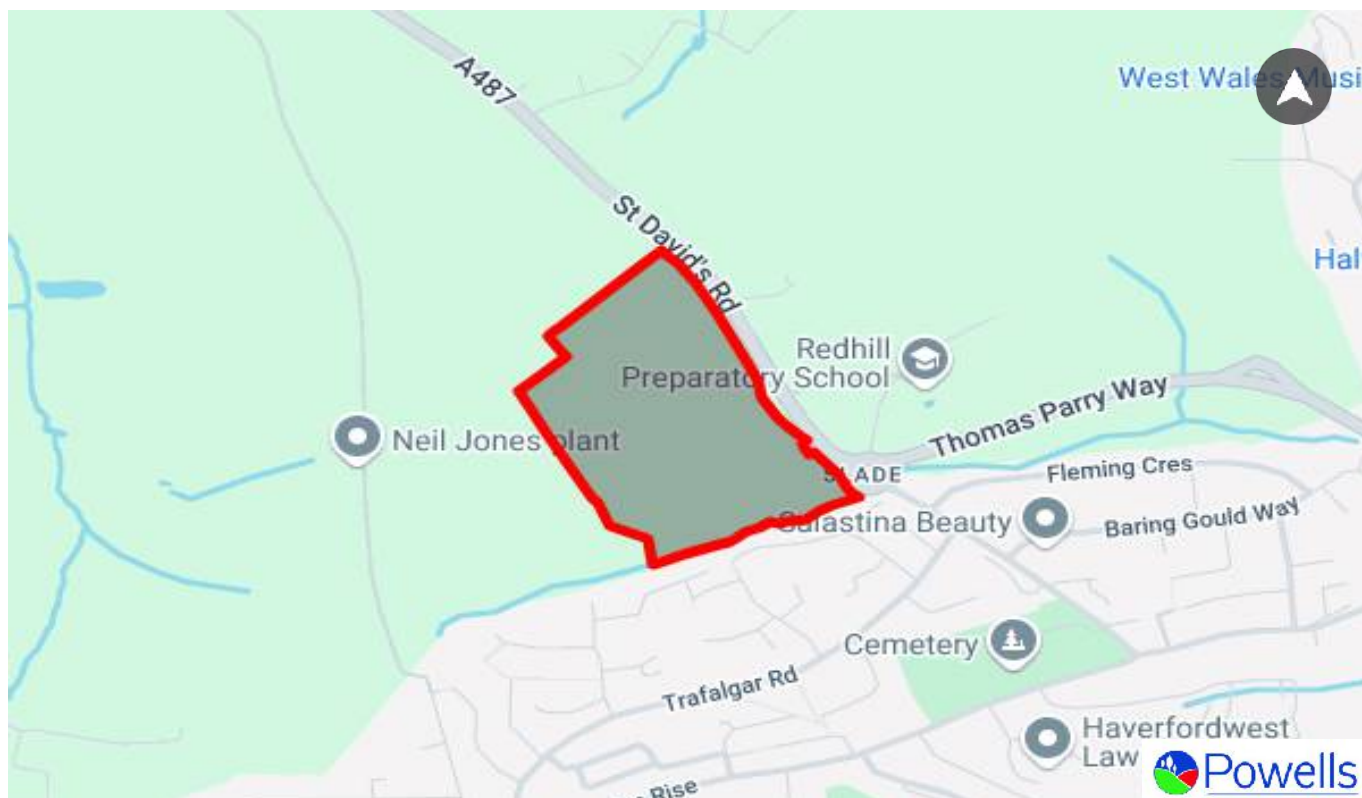


Redline Plan

Satellite



OSM



Planning Data

Planning Applications



Major Applications in and around the site (600m)

No	Ref	Decision	Submitted	Use	Applicant	Units
1	18/0707/PA	Conditionally Approved	19/01/18	Residential	Mr John McGarry	NaN
New care home complex (use class C2) comprising a purpose built 6 bedroom building, a pair of one bedroom						
2	21/0351/PA	Conditionally Approved	16/09/21	Residential	Mr Carl Beddis	NaN
Erection of 8 Dwelling Houses						
3	16/0965/PA	Conditionally Approved	12/01/17		Removed to comply with our Data Retention policy	NaN
Proposed new workshop and decking.						
4	12/0852/PA	Withdrawn	010/12/12	Residential		NaN
Construction of 106 residential properties together with associated infrastructure (including preparatory earthworks).						
5	13/0854/PA	Conditionally Approved	16/01/14	Residential		NaN
Residential Development (up to 110 dwellings)						

No	Ref	Decision	Submitted	Use	Applicant	Units
6	14/0324/PA	Conditionally Approved	27/07/14	Residential	Removed to comply with our Data Retention policy	NaN
	Residential development (up to 39 dwellings), including roads, footways, sewers and landscaping, demolition of					
7	20/0813/PA	Conditionally Approved	18/12/20	Residential	RCW Homes Ltd (R Andrews)	NaN
	Residential development for 20 Units					
8	18/1228/MN	Conditionally Approved	18/03/19		Mr. Neil Jones	NaN
	Extension to existing quarry at Sladehall, including weighbridge and weighbridge office					
9	12/0830/PA		03/12/12	Mixed Use		NaN
	Construction of 729 residential properties, a Superstore and Petrol Filling Station, together with associated					
10	16/0310/PA	Withdrawn	28/06/16	Commercial	Removed to comply with our Data Retention policy	NaN
	Cinema & restaurant development including hard & soft landscaping & lighting.					
11	16/0312/PA	Withdrawn	28/06/16	Mixed Use	Removed to comply with our Data Retention policy	NaN
	Construction (inc. earthworks) and operation of a retail-led mixed use development comprising 10 retail units, a					

Planning Data

Allocations



The site is not Allocated

Areas around the site that are also allocated (600m)

Constraints



Constraints Close To The Site



Ancient Woodland



Conservation Areas



Greenspace



Landfills



Listed Buildings





Landscapes of Outstanding Natural Beauty

Land Registry Data



Landowners within the site

1 CYM181718

-  Title Area 25.578 acres
-  Proprietor: Private Ownership

Comparable Data (Tue Dec 10 2024)



Legend

- 281K
- 169K
- 110K

Within 1 mile

(from 6 months ago)

	Detached	Semi-detached	Terraced	Flat	Bungalow
Price	£311K	£167K	£143K	£68K	£241K
PPSQFT	£205.25	£197.00	£216.50	£114.00	£186.75
Current Market Value	£315K	£168K	£146K	£70K	£246K
Current Market PPSQFT	£207.25	£198.86	£224.00	£118.33	£190.25

Within 5 miles

(from 6 months ago)

	Detached	Semi-detached	Terraced	Flat	Bungalow
Price	£362K	£181K	£133K	£86K	£255K
PPSQFT	£216.26	£200.86	£180.86	£147.25	£247.00
Current Market Value	£368K	£184K	£136K	£89K	£260K
Current Market PPSQFT	£219.63	£203.93	£184.86	£153.00	£251.94

House Price Transactions List

10 recent transactions

Address	Post Code	Date Sold	Building Type	Floor Area	New Build	PPSQFT	Price	Current Market PPSQFT	Current Market Value	Built By	Asking Price
86, SCAR ROWSCANT LANE, HAVERFORDWEST, SA61 1ES		2024-10-14	Terraced	818	No	£196	£160K	£196	£160K		
123, CITY ROAD, HAVERFORDWEST, SA61 2RR		2024-10-01	Bungalow	796	No	£166	£132K	£166	£132K		
105, CITY ROAD, HAVERFORDWEST, SA61 2RR		2024-09-27	Terraced	764	No	£185	£141K	£185	£141K		
31, FURZY PARK, HAVERFORDWEST, SA61 1HG		2024-09-24	Semi-detached	861	No	£186	£160K	£186	£160K		
53, SCAR ROWSCANT LANE, HAVERFORDWEST, SA61 1ES		2024-09-20	Detached	968	No	£258	£250K	£258	£250K		
59, GLEN FIELDS ROAD, HAVERFORDWEST, SA61 1EB		2024-09-11	Detached	1550	No	£281	£435K	£281	£435K		
71, CORONATION AVENUE, HAVERFORDWEST, SA61 2RG		2024-09-05	Terraced	882	No	£189	£167K	£189	£167K		
70, HAVEN PARK DRIVE, HAVERFORDWEST, SA61 1EB		2024-09-02	Bungalow	1076	No	£232	£250K	£232	£250K		

Address	Post Code	Date Sold	Building Type	Floor Area	New Build	PPSQFT	Price	Current Market PPSQFT	Current Market Value	Built By	Asking Price
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RDWEST,
SA61 1DN

16, ST MARTINS PARK, HAVERFORDWEST, SA61 2HP		2024-08-30	Semi-detached	861	No	£215	£185K	£216	£186K		
--	--	------------	---------------	-----	----	------	-------	------	-------	--	--

20, TASKER WAY, HAVERFORDWEST, SA61 1FB

2024-08-28	Semi-detached	635	No	£276	£176K	£278	£176K
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Local Plan Data

This site is in:

Pembrokeshire

House Delivery Test

Five Year Supply

Local Plan Timeline

Pre-submission



Pembrokeshire County Council Local Development Plan 2 – Planning

Adopted



Pembrokeshire Coast National Park Local Development Plan 2 (Replacement) - end date 2031

Adopted



Pembrokeshire Future Plan 2017-2033

Housing delivery test

Required

Delivered

5-Year Housing Supply



[5 Year Plan Document](#)

Overall
Period target

Homes

Required 5
year supply

Homes

Current 5
year supply

Homes



Attributions:
<https://landstack.co.uk/policies/dataAttributions>
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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)

Enw Name	Mr Lyn Morgan	Mr Stuart Leaver
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)	Owner	Associate Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		Powells (Site Promoter)
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		



Llofnodwyd (gallwch teipio) Signed (can be typed)	Stuart Leaver
Dyddiad Date	10th December 2024
RHAN B: Eich sylw PART B: Your representation	
Eich enw / sefydliad Your name / organisation	Stuart Leaver – Powells on behalf of our client Mr L Morgan
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)	RLDP document generally
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)	
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.	✓



<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i></p> <p>I think that the procedural requirements have not been met.</p>		
<p>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>?</p> <p><i>Ticiwch <u>bob un</u> sy'n berthnasol.</i></p> <p>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</p> <p>Tick <u>all</u> that apply.</p>		
<p><i>Dyraniad safle newydd</i></p> <p>New site allocation</p>		✓
<p><i>Polisi newydd</i></p> <p>New policy</p>		✓
<p><i>Paragraff neu destun ategol newydd</i></p> <p>New paragraph or supporting text</p>		
<p>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).</p> <p>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).</p>		
<p><i>Enw'r safle</i></p> <p>Site name</p>	<p>Land at Hook, Pembs (As per the enclosed representations)</p>	
<p><i>Cyfeiriad y cais</i></p> <p>Site reference</p>	<p>Not previously submitted.</p>	
<p><i>Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.</i></p> <p>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.</p>		



5. Rhestrwch eich sylwadau isod.

Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/profion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.

Tick here if you are submitting additional material to support your representation.



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.

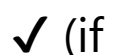
6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

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.

Rwyf am siarad mewn sesiwn gwrandawriad.



(if



I want to speak at a public hearing.	required)
<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>	
Propsoed alternative candidate site at Hook	
<p>9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</p> <p>9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i></p> <p>I wish to be heard in Welsh.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i></p> <p>I wish to be heard in English.</p>	✓



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/brofion 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.

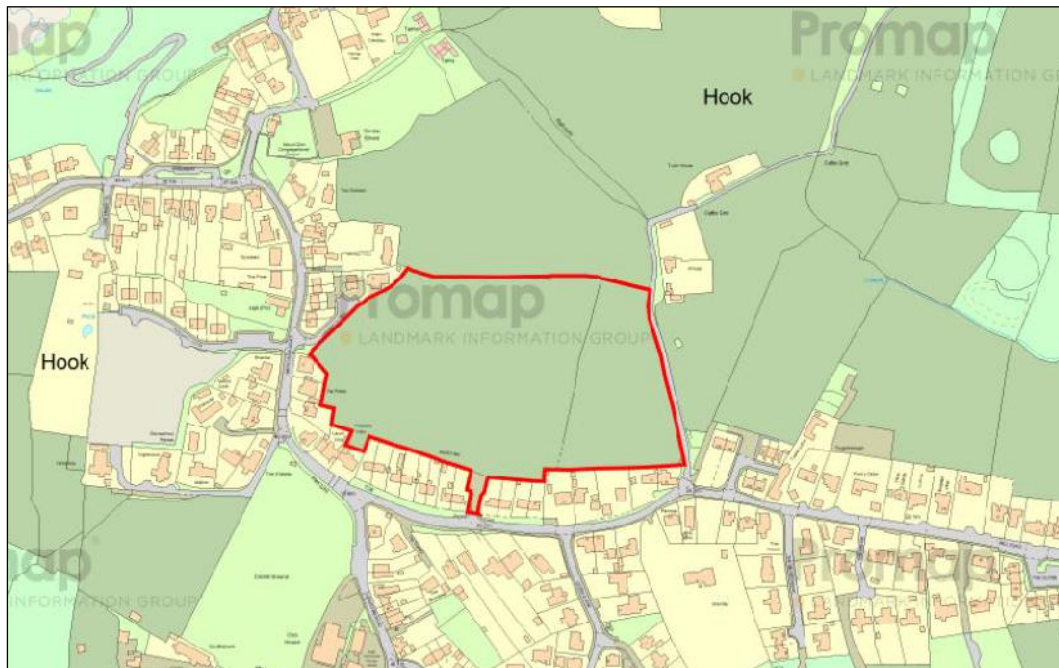
Professional Written Representations:

9.71 Acres of Land at Hook, Pembrokeshire (Alternative Site) including Sustainability Appraisal

Prepared by



Mr L Morgan



November 2024

Introduction

These representations are made in respect of the Draft Local Development Plan (LDP) for Pembrokeshire. This submission provides comments on the current draft, focusing on the proposed Allocations for housing in Pembrokeshire. These representations propose an alternative site of approximately 9.71-acre at Hook. The submission highlights the site's deliverability, sustainability, and alignment with LDP objectives, making the case for its inclusion as a residential allocation in the emerging plan. These representations include a Sustainability Appraisal within Appendix 1.

Assessment of the Draft Plan

The Draft LDP identifies the need for new residential development to meet both market and affordable housing demand across Pembrokeshire. While Hook is as a sustainable settlement capable of supporting housing growth, the plan's proposed allocations fail to maximise its potential for sustainable development.

Key concerns with the draft plan include:

- **Underutilisation of Hook's Development Capacity:** The plan does not allocate sufficient land to meet the housing needs of the settlement and surrounding need.
- **Limited Scope for Affordable Housing:** The draft plan's allocations do not fully address the growing demand for affordable housing in Hook and the wider area.
- **Reliance on Constrained Allocations:** Alternative sites identified in the plan face significant challenges related to infrastructure and environmental constraints, raising concerns about their deliverability within the plan period.

Objections to Current Allocations

The proposed housing allocations in Hook are insufficient to meet identified needs. The draft plan underestimates the settlement's ability to accommodate additional growth sustainably, given its existing infrastructure and accessibility to regional services. This oversight risks undermining the LDP's objectives for balanced rural growth.

Proposal for Inclusion of the Site

The 9.71-acre site at Hook offers a logical and sustainable extension to the village. Its allocation would address the housing shortfall identified in the draft plan while supporting Hook's role as a service-rich settlement. The site's key attributes include:

1. **Deliverability:**
 - The site is immediately available for development and unconstrained by significant environmental or infrastructure barriers.
 - Its proximity to existing road networks and utilities ensures that housing can be delivered promptly within the plan period.

2. Sustainability:

- Located near Hook's primary school and local amenities, the site reduces the need for car travel and supports active travel initiatives.
- The 308 bus service provides regular links to Haverfordwest and surrounding areas, promoting sustainable commuting patterns.

3. Alignment with LDP Objectives:

- Allocating this site supports the LDP's aim to distribute housing growth sustainably across rural settlements with sufficient infrastructure.
- Development on this site would complement existing services and ensure the long-term viability of Hook as a thriving rural community.

4. Environmental Considerations:

- The site is outside flood risk areas and offers opportunities for biodiversity enhancement through the inclusion of green infrastructure.
- Development can be designed to integrate sensitively with the surrounding environment, maintaining Hook's rural character.

Justification for Allocation

The inclusion of this site within the LDP would:

- **Meet Housing Need:** By delivering both market and affordable housing, the site addresses local demand and supports balanced population growth.
- **Support Sustainable Development:** Its location and characteristics align with principles of sustainable planning, including active travel and public transport access.
- **Enhance Rural Vitality:** Additional housing would sustain local services, including shops and schools, reinforcing Hook's role as a service hub.
- **Provide a Deliverable Option:** With no significant constraints, the site offers a realistic and achievable solution to meeting housing targets.

Conclusion

The 9.71-acre site at Hook represents a highly sustainable and deliverable opportunity for residential development. Its inclusion in the emerging LDP would address critical housing needs while supporting the settlement's growth and long-term viability. These representations respectfully request that the site be allocated within the Local Development Plan to ensure the Council's objectives for sustainable and balanced growth are met effectively.

APPENDIX 1

Sustainability Appraisal: 9.71 Acres of Land at Hook, Pembrokeshire

Introduction

A sustainability appraisal is a structured evaluation process designed to assess the environmental, social, and economic impacts of proposed developments. It ensures alignment with sustainable development principles and helps identify opportunities to support balanced growth while protecting natural resources and community well-being. This appraisal focuses on the 9.71-acre site at Hook, Pembrokeshire, proposed for residential development, evaluating its potential contribution to sustainable town planning and its alignment with the objectives of the Local Development Plan (LDP).

Site Context

- **Location:** The site is located on the periphery of Hook village, providing a logical extension to the settlement.
- **Proposed Use:** Residential development, offering a mix of market and affordable housing to meet local needs.
- **Proximity to Services:**
 - The site is accessible to the existing amenities in Hook, including a primary school and local shops.
 - Public transport connectivity is provided through the 308 bus service, linking Hook to Haverfordwest and nearby settlements.

Sustainability Factors

1. Accessibility:

- The site benefits from its proximity to the primary school and village amenities, enabling safe and convenient walking routes. This reduces dependence on private vehicles, aligning with active travel and low-carbon objectives.
- The 308 bus service provides direct links to Haverfordwest, ensuring access to regional employment, healthcare, and education. The table below summarises the bus timetable for the area:

Direction	Stop	Morning Departure	Afternoon Departure
To Haverfordwest	Hook	09:28	13:28
	Freystrop Cross	09:32	13:32
	Merlins Bridge	09:45	13:45
	Haverfordwest Bus Station	09:55	13:55
To Hook	Haverfordwest Bus Station	10:30	14:30
	Merlins Bridge	10:40	14:40
	Freystrop Cross	10:50	14:50
	Hook	10:55	14:55

2. **Housing Need:**

- The Pembrokeshire Local Development Plan highlights a pressing need for both market and affordable housing in rural areas. This site provides an opportunity to meet these requirements within a sustainable framework.
- The site's location in Hook supports rural growth in a service-rich village, reinforcing its role as a local hub.

3. **Transport and Active Travel:**

- The availability of public transport encourages sustainable commuting patterns, reducing vehicle use and associated emissions.
- Footpath improvements can further promote active travel, connecting residents safely to local facilities and public transport stops.

4. **Environmental Considerations:**

- The site is not located within a flood risk area, ensuring resilience to climate-related challenges.
- Opportunities exist to enhance biodiversity through the incorporation of green infrastructure, such as wildlife corridors, hedgerows, and tree planting.

5. **Economic and Social Impact:**

- Development of this site would support the local economy by sustaining shops, schools, and other services in Hook.
- Construction activities would provide temporary economic benefits, while the increased population would generate long-term economic activity in the area.

Key Arguments for Allocation

- **Deliverability:** The site is readily available for development, with no significant constraints that would impede its timely delivery.
- **Sustainability:** Its location close to services, school, and public transport ensures alignment with sustainable development principles.
- **Community Growth:** Allocating this site would contribute to the long-term vitality of Hook, enabling it to accommodate population growth while retaining its rural character.
- **Alignment with LDP Objectives:** The site's development aligns with the Local Development Plan's aim to distribute growth sustainably across rural settlements.

Conclusion

The 9.71-acre site at Hook represents a sustainable and deliverable option for residential development. Its inclusion in the emerging Local Development Plan would address housing needs, support local services, and contribute to balanced, sustainable growth in the Pembrokeshire area. This appraisal strongly recommends the site's allocation to ensure the objectives of the LDP are met effectively.

land lying to the east of West Hook Road, Haverfordwest

|

Site Report

Content



Title and Contents



General Information



Site Plan
Satellite
OSM



Planning Data
Planning Apps
Allocations
SHLAA
Minor Apps



Constraints



Land Registry
Land Owner Info



Comparable Data
Average
All Data



Local Authority Info

General Information

General Information

District	Pembrokeshire
Size(ha)	3.873
Size(a)	9.569
Units	182
Address	land lying to the east of West Hook Road, Haverfordwest

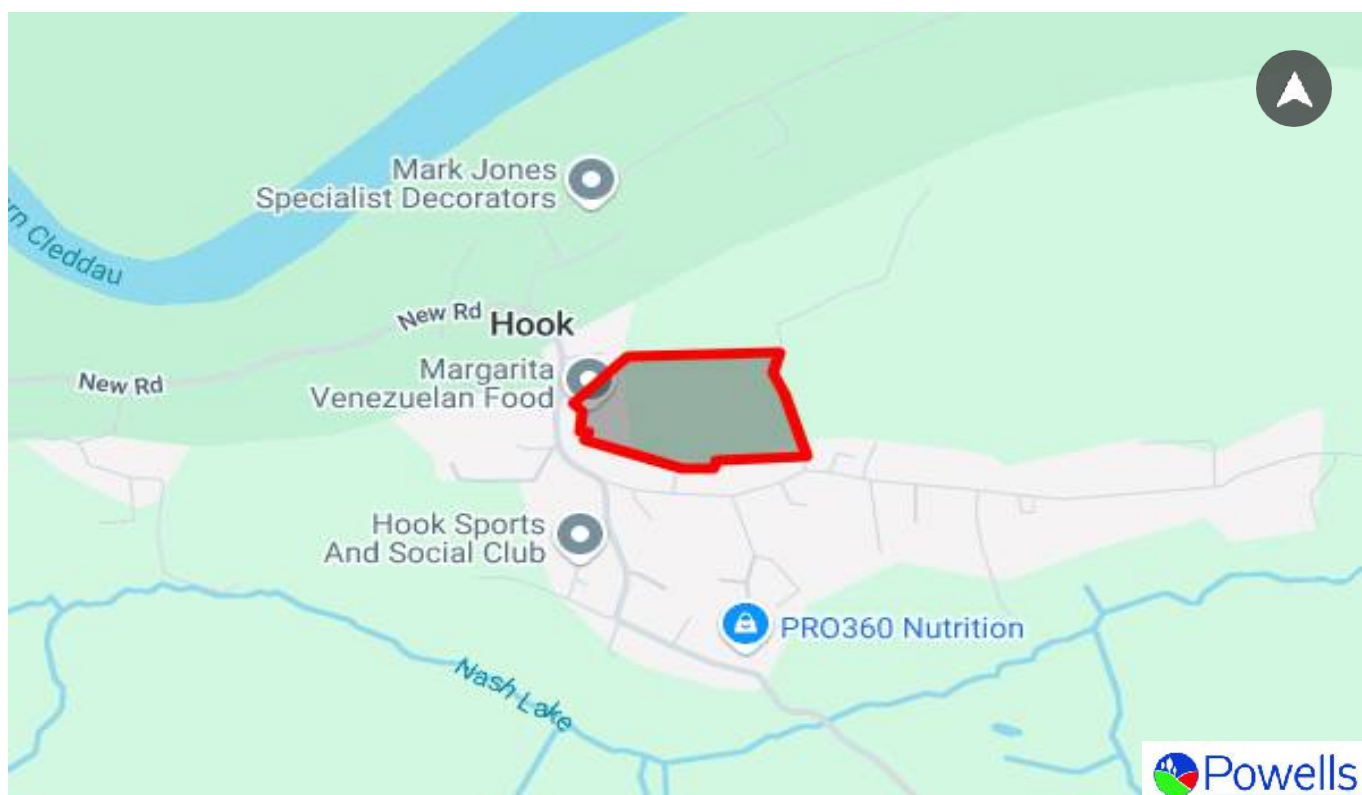


Redline Plan

Satellite



OSM



Planning Data

Planning Applications



Major Applications in and around the site (600m)

No	Ref	Decision	Submitted	Use	Applicant	Units
1	12/0359/PA		23/07/12	Residential		NaN
	Residential Development - (Outline)					
2	18/0404/PA	Conditionally Approved	30/07/18		Ms Anastasia Psychari (Dwr Cymru Welsh Water)	NaN
	Installation of ground-mounted solar panels					
3	24/0804/PA		03/12/24	Residential		NaN
	Erection of dwelling					
4	14/1158/PA	Refused	23/03/15	Residential	Removed to comply with our Data Retention policy	NaN
	Development of 5 dwellings					
5	16/0130/PA	Conditionally Approved	24/05/16	Commercial	Removed to comply with our Data Retention policy	NaN
	Four new equipment kiosks housing electrical control panels, blowers and sludge thickening/polymer dosing plant, a					

Planning Data

Allocations



The site is not Allocated

Areas around the site that are also allocated (600m)

Constraints



Constraints Close To The Site

● Ancient Woodland

● Common Land

● Floodzone 2

● Floodzone 3

● Greenspace

● Landfills

● National Parks

Special Area of Conservation

● Sites of Special Scientific Interest



● Landscapes of Outstanding Natural Beauty

Land Registry Data



Landowners within the site

1 CYM496257

-  Title Area 32.156 acres
-  Proprietor: Private Ownership

Comparable Data (Tue Dec 10 2024)



Legend

■	281K
■	169K
■	110K

Within 1 mile (from 18 months ago)

	Detached	Semi-detached	Terraced	Flat	Bungalow
Price	£406K	£170K	£205K	None	£250K
PPSQFT	£172.30	£165.00	£258.00	None	£255.50
Current Market Value	£410K	£175K	£207K	None	£258K
Current Market PPSQFT	£174.20	£170.00	£260.00	None	£266.17

Within 5 miles (from 6 months ago)

	Detached	Semi-detached	Terraced	Flat	Bungalow
Price	£357K	£185K	£142K	£89K	£244K
PPSQFT	£213.00	£200.71	£165.35	£144.00	£260.35
Current Market Value	£362K	£188K	£145K	£93K	£250K
Current Market PPSQFT	£216.00	£204.35	£169.43	£149.60	£266.35

House Price Transactions List

10 recent transactions

Address	Post Code	Date Sold	Building Type	Floor Area	New Build	PPSQFT	Price	Current Market PPSQFT	Current Market Value	Built By	Asking Price
44, LOWER QUAY ROAD, HAVERFORDWEST, SA62 4LR		2024-10-04	Detached	2604	No	£231	£601K	£231	£601K		
16, NEW ROAD, HAVERFORDWEST, SA62 4LH		2024-09-12	Detached	1076	No	£307	£330K	£307	£330K		
25B, LANDSEER VIEW, HAVERFORDWEST, SA62 4LY		2024-07-04	Bungalow	688	No	£230	£159K	£241	£166K		
OVERDALE, NEWTOWN ROAD, HAVERFORDWEST, SA62 4ND		2024-07-01	Bungalow	1001	No	£218	£218K	£226	£227K		
11, LEVEN CLOSE, HAVERFORDWEST, SA62 4LF		2024-07-01	Detached	1593	No	£82	£130K	£85	£135K		
7, LEVEN CLOSE, HAVERFORDWEST, SA62 4LF		2024-06-06	Detached	1593	No	£251	£400K	£261	£415K		
77, PILL ROAD, HAVERFORDWEST, SA62 4LX		2024-04-30	Bungalow	1087	No	£330	£359K	£335	£364K		
9, GREEN WAY, HAVERFORDWEST, SA62 4LL		2024-04-16	Semi-detached	1033	No	£165	£170K	£170	£175K		
4, THE		2024	Detached	1733	No	£268	£465K	£273	£473K		

Address	Post Code	Date Sold	Building Type	Floor Area	New Build	PPSQFT	Price	Current Market PPSQFT	Current Market Value	Built By	Asking Price
MEADS DRIVE, H AVERFORDWEST, SA62 4LZ		-04-05									
7, THE MEADS DRIVE, H AVERFORDWEST, SA62 4LZ		2024-03-21	Detached	2551	No	£171	£435K	£176	£450K		

Local Plan Data

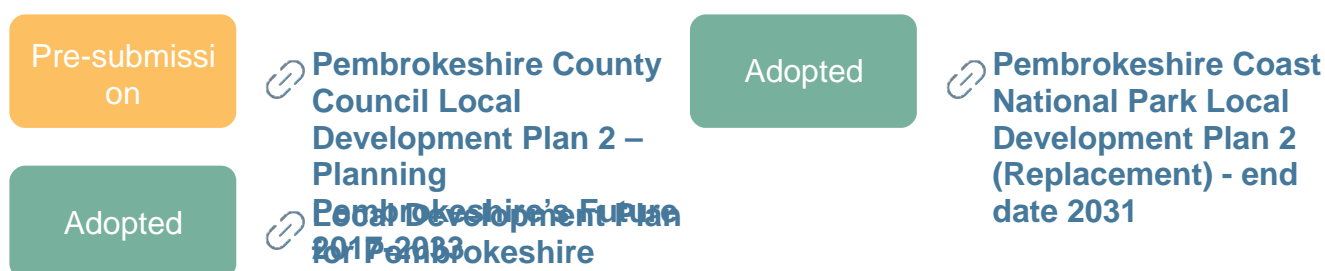
This site is in:

Pembrokeshire

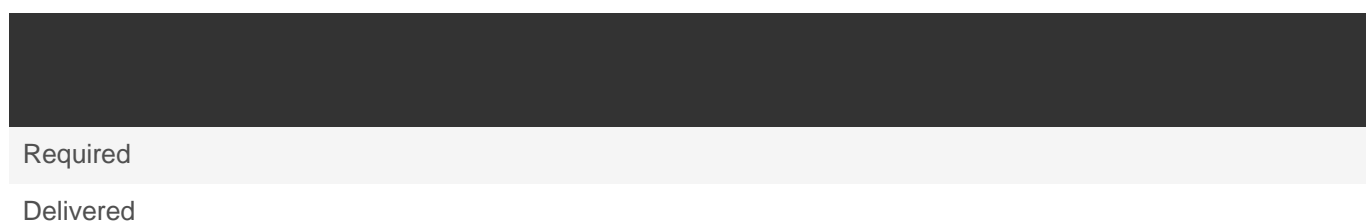
House Delivery Test

Five Year Supply

Local Plan Timeline



Housing delivery test



5-Year Housing Supply

[5 Year Plan Document](#)

Overall Period target	Required 5 year supply	Current 5 year supply
Homes	Homes	Homes



Attributions:
<https://landstack.co.uk/policies/dataAttributions>
Imagery ©2024 Airbus, Bluesky, Infoterra Ltd & COWI A/S, CNES / Airbus, Maxar Technologies

Land at Hook site plan



Keyboard shortcuts Map data ©2024 Imagery ©2024 Airbus, Bluesky, Infoterra Ltd & COWI A/S, Maxar Technologies Terms Report a map error

Landstack



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)**

Enw Name	Mr Lyn Morgan	Mr Stuart Leaver
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)	Owner	Associate Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		Powells (Site Promoter)
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		



Llofnodwyd (gallwch teipio) Signed (can be typed)	Stuart Leaver
Dyddiad Date	10th December 2024
RHAN B: Eich sylw PART B: Your representation	
Eich enw / sefydliad Your name / organisation	Stuart Leaver – Powells on behalf of our client Mr L Morgan
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)	RLDP document generally
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)	
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.	✓



<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i></p> <p>I think that the procedural requirements have not been met.</p>		
<p>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>?</p> <p><i>Ticiwch <u>bob un</u> sy'n berthnasol.</i></p> <p>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</p> <p>Tick <u>all</u> that apply.</p>		
<p><i>Dyraniad safle newydd</i></p> <p>New site allocation</p>		✓
<p><i>Polisi newydd</i></p> <p>New policy</p>		✓
<p><i>Paragraff neu destun ategol newydd</i></p> <p>New paragraph or supporting text</p>		
<p>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).</p> <p>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).</p>		
<p><i>Enw'r safle</i></p> <p>Site name</p>	<p>Land at Llangwm, Pembs (As per the enclosed representations)</p>	
<p><i>Cyfeiriad y cais</i></p> <p>Site reference</p>	<p>Not previously submitted.</p>	
<p><i>Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.</i></p> <p>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.</p>		



5. Rhestrwch eich sylwadau isod.

Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/profion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.

Tick here if you are submitting additional material to support your representation.



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.

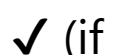
6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

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.

Rwyf am siarad mewn sesiwn gwrandawriad.



(if



I want to speak at a public hearing.	required)
<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>	
Propsoed alternative candidate site at Hook	
<p>9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</p> <p>9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i></p> <p>I wish to be heard in Welsh.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i></p> <p>I wish to be heard in English.</p>	✓



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.

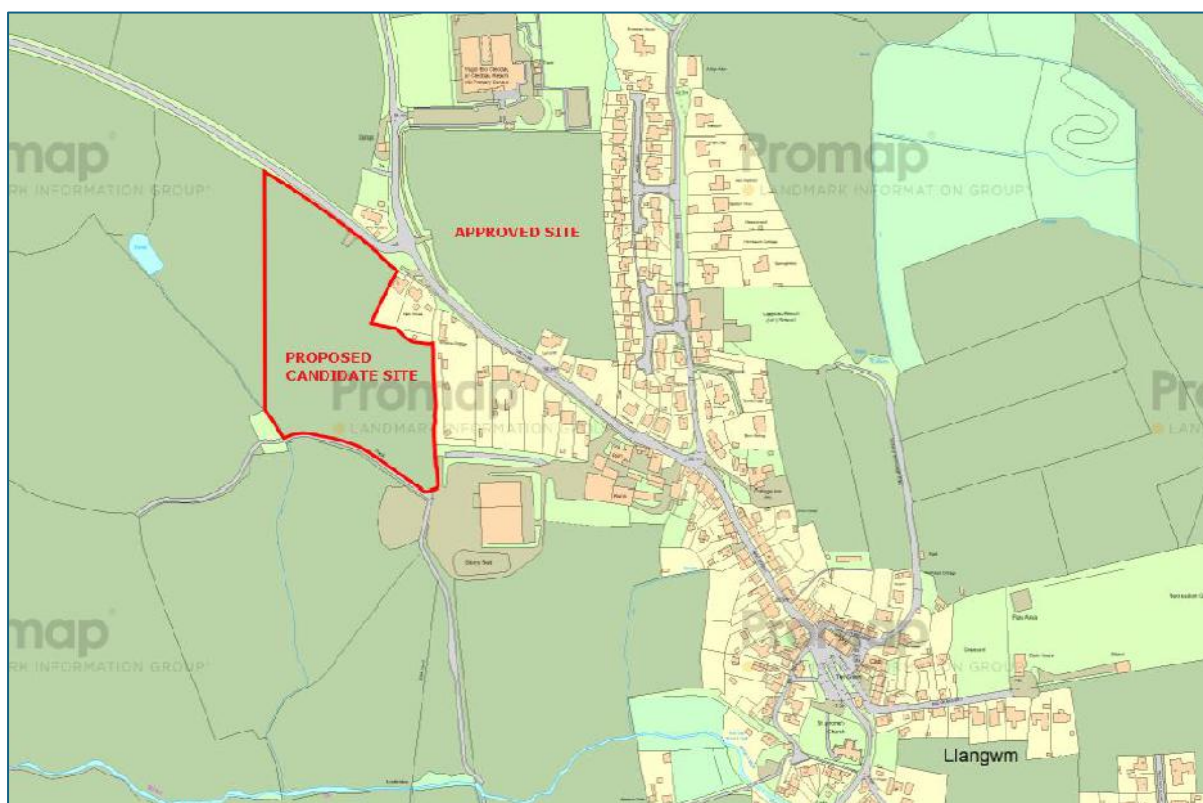
Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint 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.

Written Representations to the Draft Pembrokeshire County Council

Proposed Alternative Site of 6.67 Acres of Land at Llangwm, Pembrokeshire Including Sustainability Appraisal



November 2024

Introduction

These representations are made in respect of the Draft Local Development Plan (LDP) for Pembrokeshire. This submission provides comments on the current draft, proposing the 6.67-acre site at Llangwm as a sustainable and logical addition to the plan's residential allocations. Llangwm, as a designated Service Village, is well-placed to accommodate modest growth that supports the settlement's vitality and sustainability. This representation highlights the site's deliverability, sustainability, and alignment with the objectives of the LDP, making the case for its inclusion as an allocation in the emerging plan.

Assessment of the Draft Plan

The Draft LDP identifies Service Villages like Llangwm as sustainable locations for small-scale housing growth to meet local needs. However, the draft plan fails to maximise Llangwm's potential as a Service Village, given its strong infrastructure and strategic position in the settlement hierarchy. The plan overlooks the ability of the settlement to accommodate modest, well-integrated growth that supports both local and countywide objectives. Key concerns with the draft plan include:

- **Limited Housing Allocation:** The existing allocations in Llangwm are insufficient to address identified housing needs, particularly the delivery of mixed-tenure housing that includes affordable homes. The lack of additional allocations risks failing to meet the aspirations set out in the LDP's housing policies, which emphasise delivering sustainable and inclusive communities.
- **Reliance on Sites with Limited Deliverability:** Allocations in other settlements often face significant constraints, including infrastructure deficits, environmental designations, or ownership complexities. Such issues cast doubt on their ability to deliver housing within the plan period, making the allocation of additional, readily available sites like Llangwm critical to ensuring the LDP's robustness and effectiveness.
- **Underutilisation of Llangwm's Potential:** Llangwm's existing services, including a primary school, local shops, and community facilities, position it as an ideal candidate for modest growth. The site's location and characteristics align with the principles of sustainable development, yet the draft plan underrepresents its potential to contribute to the broader objectives of settlement vitality and balanced growth.

Proposal for Inclusion of the Site

The 6.67-acre site at Llangwm represents a sustainable and deliverable option for residential development. Its inclusion in the LDP would address local housing needs and support the village's long-term sustainability by providing homes that align with the community's growth potential and environmental considerations. Key attributes of the site include:

1. Deliverability:

- The site is immediately available for development and free from significant constraints such as ecological or infrastructure challenges. This ensures a smooth pathway for planning and delivery within the plan period.
- Its location adjacent to existing road networks and utility connections simplifies infrastructure provision, minimising costs and delays.

- As a smaller site in a Service Village, it avoids complexities often associated with larger developments, ensuring housing delivery meets identified needs promptly.

2. Sustainability:

- The site's proximity to critical local services, such as Llangwm's primary school, shops, and community facilities, ensures that future residents can access essential amenities by foot, reducing dependency on cars and lowering emissions.
- The proposal includes enhancements to the pedestrian network, including improved footways, fostering safer and more accessible active travel options for residents, especially families with children attending the nearby school.
- Located within an established settlement, the site aligns with the principles of sustainable development by concentrating growth in areas with existing infrastructure, avoiding urban sprawl, and preserving the wider countryside.

3. Alignment with LDP Objectives:

- Allocating this site directly supports the LDP's goal of directing sustainable growth to Service Villages, ensuring rural settlements remain vibrant and well-supported.
- The proposed development would help address both market and affordable housing shortages within Llangwm, supporting balanced and inclusive growth.
- Strengthening Llangwm's role as a Service Village through well-planned growth aligns with the plan's emphasis on protecting and enhancing local services, preventing stagnation and decline.

4. Environmental Considerations:

- The site's location outside flood risk zones and its distance from ecologically sensitive areas ensure compliance with stringent environmental protection policies.
- Opportunities for biodiversity enhancements, such as planting native species, incorporating green spaces, and establishing wildlife corridors, contribute to environmental net gains and community well-being.
- Sustainable drainage systems (SuDS) can be integrated to manage surface water, preventing runoff and enhancing resilience to climate impacts.

By leveraging these attributes, the proposed development would not only address local housing needs but also strengthen the fabric of the community while maintaining environmental integrity.

The inclusion of this site within the LDP would:

- Address Local Housing Needs: The development would deliver a mix of market and affordable housing, meeting identified demand and promoting a balanced community.
- Enhance Sustainability: Its location within walking distance of key services and its integration with active travel networks ensure alignment with sustainable planning principles.

- **Provide a Deliverable Option:** The site's readiness for development ensures it can contribute to housing delivery within the plan period, avoiding delays associated with constrained allocations.
- **Support the Settlement Hierarchy:** Allocating this site would reinforce Llangwm's role as a Service Village, supporting its infrastructure and maintaining its relevance within the county's settlement strategy.

Conclusion

The 6.67-acre site at Llangwm represents a sustainable and deliverable opportunity for residential development. Its allocation in the Local Development Plan would address housing needs, enhance sustainability, and support the objectives of the LDP. These representations respectfully request that the site be included as a residential allocation within the emerging plan, ensuring Pembrokeshire's growth is both balanced and sustainable.

Appendix 1

Sustainability Appraisal

6.67 Acres of Land at Llangwm, Pembrokeshire

Introduction

A sustainability appraisal is a systematic process designed to assess the potential environmental, social, and economic impacts of proposed developments or policies. It ensures that decisions are made in line with the principles of sustainable development, balancing growth with the protection of natural and community resources. This appraisal examines the 6.67 acres of land at Llangwm, Pembrokeshire, proposed for residential development. It evaluates the site against key sustainability factors, ensuring its suitability and alignment with sustainable town planning objectives.

Site Context

- **Location:** The site lies on the southwestern edge of Llangwm, in close proximity to an allocated and approved development site currently being delivered by affordable housing developer ATEB.
- **Proposed Use:** Residential development providing a mix of market and affordable housing.
- **Proximity to Services:**
 - The site is within walking distance of the local primary school, which enhances its sustainability credentials.
 - Public transport provision includes a regular bus service connecting Llangwm to Haverfordwest and surrounding areas.
 - Proposed footway improvements will enhance pedestrian access to the school, village centre, and bus stops.

Planning Policy Context

The Pembrokeshire Deposit Local Development Plan (LDP) 2017-2033 identifies a need for 5,840 new homes to meet housing demand over the plan period, with a focus on delivering sustainable growth in both urban and rural settlements. Llangwm is designated as a "Service Village," which allows for appropriate levels of housing growth where services and infrastructure are available. The site at Llangwm aligns with the LDP's spatial strategy by offering a sustainable location for development with access to local services and facilities, while supporting the vitality of the community.

Sustainability Factors

1. Accessibility:

- The site benefits from proximity to the local primary school and village amenities, reducing the need for car travel. This is a key aspect of sustainable town planning as it promotes walkable communities, reducing carbon emissions and fostering community interaction.
- Public transport is available through Route 308, providing connections to Haverfordwest and surrounding settlements. Reliable public transport reduces reliance on private vehicles, aligning with sustainable development goals to minimise environmental impacts and enhance social inclusivity.

2. Housing Need:

- With the existing affordable housing site nearing completion, additional housing capacity is necessary to meet local demand for both market and affordable homes. Addressing housing needs is essential for balanced growth, ensuring that all community members, including those on lower incomes, can access safe and adequate housing while supporting local economic stability.

3. Transport and Active Travel:

- The bus service enhances regional connectivity, reducing reliance on private cars. Connectivity to regional hubs ensures equitable access to employment opportunities, healthcare, and education, reinforcing the principles of sustainable growth.
- Proposed pedestrian footway improvements will facilitate safe walking routes to the school and village, encouraging active travel. Active travel not only reduces environmental impacts but also promotes healthier lifestyles and strengthens local engagement.

4. Environmental Considerations:

- The site is not within a flood risk area and offers opportunities for biodiversity enhancement through sensitive development. Protecting against flood risks and enhancing biodiversity are critical for resilience against climate change and for maintaining ecological balance in development projects.
- The development can incorporate green infrastructure to support local wildlife and enhance community well-being. Green infrastructure provides dual benefits of aesthetic value and ecosystem services, such as air quality improvement and urban cooling, which are foundational to sustainable planning.

5. Economic and Social Impact:

- Development would support the viability of local services, including the primary school, by accommodating population growth. Sustainable town planning emphasises the integration of housing growth with the strengthening of social infrastructure, ensuring that communities thrive both economically and socially.
- Construction activity and the resulting increase in local spending would contribute positively to the local economy. Economic benefits from construction and increased population help sustain small businesses and foster vibrant, self-sufficient communities.

Bus Service Table

The site is served by the Haverfordwest-Llangwm-Burton Circular bus service (Route 308). The bus stops at Llangwm (Green), providing residents with accessible public transport options. The table below outlines the bus schedule:

Direction	Stop	Morning Departure	Evening Departure
To Haverfordwest	Llangwm (Green)	08:06	17:01 (on request)
	Hook	08:12	17:07
	Freystrop (Cross)	08:16	17:11
	Merlin's Bridge (St Issell's Ave)	08:22	17:17
	Haverfordwest (Bus Station)	08:35	17:30
To Llangwm	Haverfordwest (Bus Station)	16:10	
	Merlin's Bridge (St Issell's Ave)	16:22	
	Freystrop (Cross)	16:28	
	Hook	16:32	
	Llangwm (Green)	16:38	

This regular service enhances connectivity for the site, ensuring access to employment, retail, and healthcare facilities in Haverfordwest.

Key Arguments for Allocation

- Deliverability:** The site is immediately available for development with no significant physical or environmental constraints identified. It has direct access to necessary infrastructure, including utilities and road connections, which makes it an achievable and realistic option for allocation within the plan period. The absence of significant barriers ensures that development could commence promptly. Deliverability ensures that housing needs are met in a timely manner, supporting sustainable population growth.
- Sustainability:** The site's location within close walking distance of the village primary school and its access to local services reduce the need for car travel. Its proximity to regular public transport further enhances sustainability by enabling active travel and access to employment and services in Haverfordwest and surrounding areas. The proposed footway improvements further encourage safe pedestrian routes, aligning with the principles of sustainable and active development. Incorporating such elements ensures environmental stewardship and community well-being.
- Capacity for Growth:** Llangwm's existing infrastructure—including its school, road network, and public transport connections—is capable of supporting additional housing growth. Expanding the housing provision would strengthen Llangwm's role as a Service Village, addressing both market and affordable housing needs while contributing to the

community's long-term sustainability and vitality. Planning for capacity ensures that growth is harmonised with the village's infrastructure capabilities, avoiding strain while maximising benefits for residents.

Land west of Llangwm, Pembs site plan



Keyboard shortcuts Map data ©2024 Imagery ©2024 Airbus, Bluesky, Infoterra Ltd & COWI A/S, Maxar Technologies Terms Report a map error

Landstack

Land lying to the north-west of Llangwm Farm, The Kilns, Llangwm, Haverfordwest (SA62 4HG)

|

Site Report

Content



Title and Contents



General Information



Site Plan
Satellite
OSM



Planning Data
Planning Apps
Allocations
SHLAA
Minor Apps



Constraints



Land Registry
Land Owner Info



Comparable Data
Average
All Data



Local Authority Info

General Information

General Information

District	Pembrokeshire
Size(ha)	2.534
Size(a)	6.262
Units	119
Address	Land lying to the north-west of Llangwm Farm, The Kilns, Llangwm, Haverfordwest (SA62 4HG)

Postal Code SA62 4HG



Redline Plan

Satellite



OSM



Planning Data

Planning Applications



Major Applications in and around the site (600m)

No	Ref	Decision	Submitted	Use	Applicant	Units
1	23/0057/PA	Conditionally Approved	010/05/23	Commercial	Mr Wayne Davies	NaN
	Outline application for erection of single residential dwelling together with car parking and landscaping following					
2	24/0120/PA		21/05/24	Residential	Ateb Group	NaN
	Construction of 67no. Dwellinghouses with Access, Estate Roads and Associated Infrastructure					
3	23/0676/PA	Conditionally Approved	26/010/23		Dr Christine Jones	NaN
	Repositioning of previously approved dwelling (21/0719/PA and enlargement of red line boundary).					

Planning Data

Allocations



The site is not Allocated

Areas around the site that are also allocated (600m)

Constraints



Constraints Close To The Site

● Common Land

● Conservation Areas

● National Parks

● Traditional Orchards



● Landscapes of Outstanding Natural Beauty

Land Registry Data

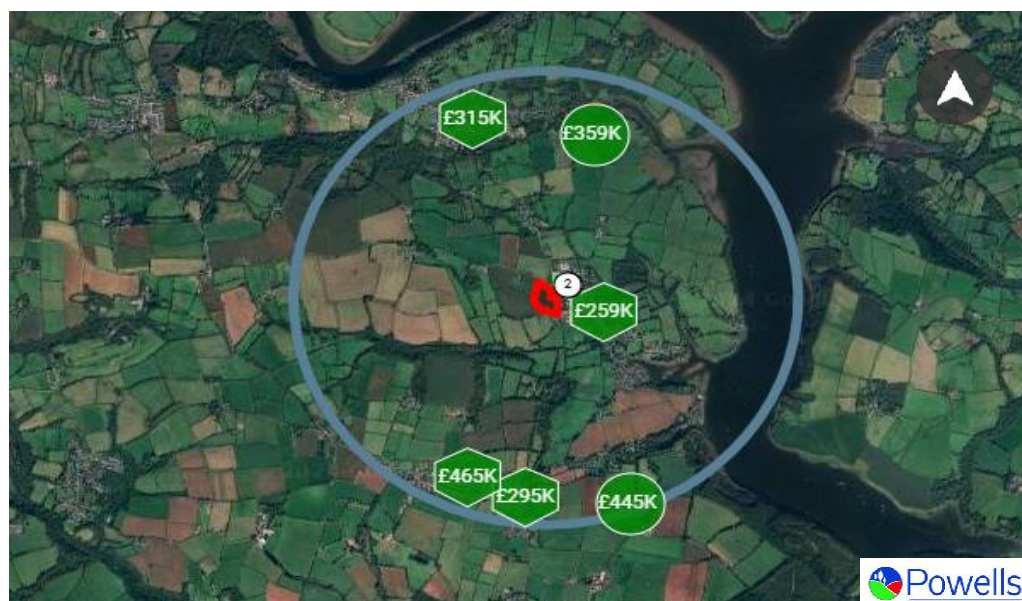


Landowners within the site

1 CYM837251

-  Title Area 11.782 acres
-  Proprietor: Private Ownership

Comparable Data (Tue Dec 10 2024)



Legend

■	281K
■	169K
■	110K

Within 1 mile (from 18 months ago)

	Detached	Semi-detached	Terraced	Flat	Bungalow
Price	£340K	£310K	£266K	None	£224K
PPSQFT	£187.43	£238.00	£216.60	None	£259.75
Current Market Value	£348K	£337K	£276K	None	£232K
Current Market PPSQFT	£192.79	£259.00	£225.40	None	£270.75

Within 5 miles (from 6 months ago)

	Detached	Semi-detached	Terraced	Flat	Bungalow
Price	£350K	£181K	£149K	£89K	£253K
PPSQFT	£204.36	£191.50	£157.58	£144.00	£250.70
Current Market Value	£356K	£185K	£152K	£93K	£259K
Current Market PPSQFT	£207.71	£195.39	£161.09	£149.60	£256.57

House Price Transactions List

10 recent transactions

Address	Post Code	Date Sold	Building Type	Floor Area	New Build	PPSQFT	Price	Current Market PPSQFT	Current Market Value	Built By	Asking Price
EGERTON HOUSE, NEW WELLS ROAD, MILFORD HAVEN, SA73 1NG		2024-07-10	Detached	1679	No	£235	£395K	£244	£410K		
25B, LAN DSEER VIEW, HAVERFORDWEST, SA62 4LY		2024-07-04	Bungalow	688	No	£230	£159K	£241	£166K		
OVERDALE, NEWTON ROAD, HAVERFORDWEST, SA62 4ND		2024-07-01	Bungalow	1001	No	£218	£218K	£226	£227K		
11, LEVEN CLOSE, HAVERFORDWEST, SA62 4LF		2024-07-01	Detached	1593	No	£82	£130K	£85	£135K		
7, LEVEN CLOSE, HAVERFORDWEST, SA62 4LF		2024-06-06	Detached	1593	No	£251	£400K	£261	£415K		
77, PILL ROAD, HAVERFORDWEST, SA62 4LX		2024-04-30	Bungalow	1087	No	£330	£359K	£335	£364K		
4, THE MEADS DRIVE, HAVERFORDWEST, SA62 4LZ		2024-04-05	Detached	1733	No	£268	£465K	£273	£473K		
16, MAIN STREET, HAVERFORDWEST		2024-03-26	Terraced	957	No	£235	£225K	£247	£237K		

Address	Post Code	Date Sold	Building Type	Floor Area	New Build	PPSQFT	Price	Current Market PPSQFT	Current Market Value	Built By	Asking Price
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T, SA62 4HP

18, MAIN STREET, HAVERFORDWEST, SA62 4HP		2024-03-26	Detached	839	No	£191	£160K	£197	£165K		
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7, THE MEADS DRIVE, HAVERFORDWEST, SA62 4LZ

2024-03-21	Detached	2551	No	£171	£435K	£176	£450K
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Local Plan Data

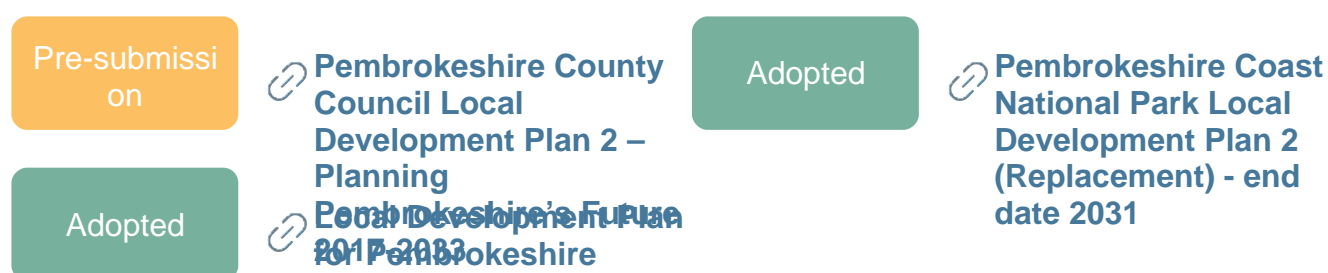
This site is in:

Pembrokeshire

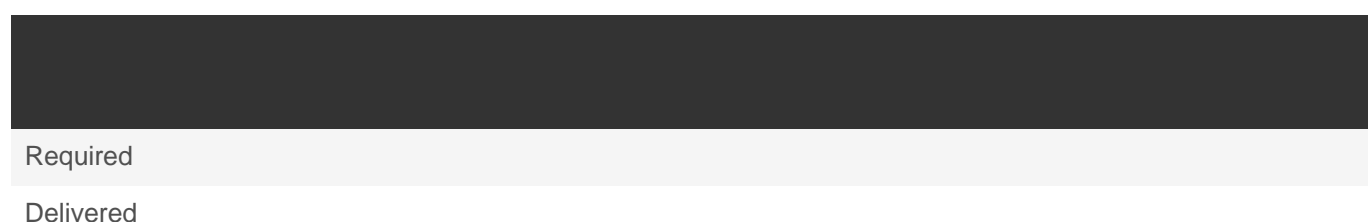
House Delivery Test

Five Year Supply

Local Plan Timeline



Housing delivery test



5-Year Housing Supply

[5 Year Plan Document](#)

Overall Period target	Required 5 year supply	Current 5 year supply
Homes	Homes	Homes



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