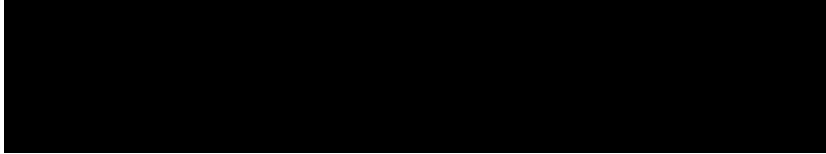


W. David Thomas BSc CEng MICE



18th November 2024

Dear LDP2 Team

Local Development Plan 2 Deposit 2

I enclose a completed response form and associated statement in respect of Candidate Site 022 north of Langford Farm Johnston to which I trust you will give due consideration.

Yours Sincerely



David Thomas
Agent

The LDP2 Team
Pembrokeshire CC
County Hall
Haverfordwest
SA611TP

Pembrokeshire
County Council

19 NOV 2024

Digital Mail Room



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

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

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.

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.

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.

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.

Mae'n rhaid derbyn eich sylwadau erbyn hanner nos Rhagfyr 16eg 2024. Dychwelwch ffurflenni at:

Your representations must be received by **midnight 16 December 2024**. Please return forms to:

neu
Y Tim Cynlluniau Datblygu, Neuadd y Sir,
Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

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. & MRS. W. SCRIVEN

W. DAVI D THOMAS
BSc. C.Eng. MICE

Teitl swydd (lle y bo'n berthnasol)
Job title (where relevant)

AGENT

Sefydliad (lle y bo'n berthnasol)
Organisation (where relevant)

Cyfeiriad
Address

Rhif ffôn

Telephone no

E-bost

Email address

Llofnodwyd (gallwch teipio)
Signed (can be typed)

Dyddiad
Date

18/11/2024



RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

Your name / organisation

W. DAVID THOMAS

AGENT

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)

CANDIDATE SITE 022
JOHNSTON

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), rhwch 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 fawr, 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 gadarnid 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 fam body CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.

I think the LDP is sound and meets procedural requirements.

No

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

I think the LDP is unsound and should be changed.

YES

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

I think that the procedural requirements have not been met.

YES

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

Ticiwch bob un sy'n berthnasol.



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

Tick all that apply.

Dyraniad safle newydd

New site allocation

YES

Polisi newydd

New policy

NO

Paragraff neu destun ategol newydd

New paragraph or supporting text

NO

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

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

Enw'r safle

Site name

NORTH OF LANGFORD ROAD.

Cyfeiriad y cais

Site reference

022 (10.65 Ha part)

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 arfamiad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfamu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfamiad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Rhestwch eich sylwadau isod.

Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/proffion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi.



Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.

5. Please set out your comments below.

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

SEE ATTACHED STATEMENT

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.

No

Rwyf am siarad mewn sesiwn gwrandawriad.

I want to speak at a public hearing.

YES

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

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



HOUSING SITE AT LANGFORD ROAD JOHNSTON

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

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

Rwy'n dymuno cael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

No

Rwy'n dymuno cael fy nghlywed yn Saesneg.

I wish to be heard in English.

YES

Statement in respect of Candidate Site 022-Land north of Langford Farm Johnston.

Background

Under LDP2 Deposit 1 this candidate site was “screened out” for the following single reason “predictive agricultural land classification Grade 2ALC” ie valuable/productive land which should be retained.

In March 2020 I made a submission to the LDP2 Team which after extensive research proved that the land in question was in fact “poor semi-improved grassland and categorised as Grade 4 ALC. This was evidenced by ecological reports from:-

- a. Hartley Preserves acting for Pembs. CC in August 2014 when seeking planning permission for the new school site (immediately east of C/S 022).
- b. Gould Ecology Consultants acting for developers for the affordable housing development west of and adjacent to C/S 022 in June 2015.
- c. Sarah Whitfield Crop Consultancy (in 2020) who confirmed that the land quality had not been improved and remained in the same low category identified in reports a and b above.

LDP2 Deposit 1 put forward no other reason for “screening out this site ie. no mention is made of land not being required or that it lay outside the existing development boundary of the Settlement.

Current Situation

LDP2 Deposit 2 now states that candidate site 022 “has passed all phases” so obviously the earlier “screening out) based on agricultural land classification has been eliminated from consideration of this site.

LDP2 Deposit 2 has now rejected this major part of C/S 022 (all bar 0.57 Ha) as not being required for housing development.

Argument

The only major site now included within the development boundary of Johnston under LDP2 Deposit 2 is Candidate Site 102 adjacent to the A4076 Trunk Road. It is submitted that that an alternative site such as 022 needs to be allocated in Johnston which could be considered (by developers) as being more favourable to c/s 102 in view of its proximity to the school, its situation off a quieter country road and nearer to the settlement sewage disposal facilities.

In my submission of March 2020 I mentioned that the owners of c/s 022 were amenable to withdrawing the eastern field from the LDP2. This would reduce the area for housing development to approximately 5.39 Ha. This remains the case with this submission.

Conclusion

Having overcome the rejection of the site under LDP2 Deposit 1 on the grounds of agricultural classification my clients consider that a further part of c/s 022 over the 0.57Ha already allocated should be accepted for housing development under LDP2 Deposit 2.

W.David Thomas BSc CEng MICE

Agent

18th November 2024