

## Thomas, Kane

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**From:** Smith, Bob  
**Sent:** 16 December 2024 16:26  
**To:** LDP - For Enquiries  
**Subject:** FW: LDP 2, Version 2.  
**Attachments:** 240618 Deposit Plan 2 Comments Form DRAFT (5).doc

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

**Categories:** D Rep

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

Dear Sir/ Madam


Further to my recent email regarding LDP 2, Version 2 we have again attempted to complete our response using the form on the website. We expected it to be interactive but it appears to be a download which we have completed. I attach a copy for your information.

Yours sincerely

David D. Haward RIBA  
**David Haward Associates**  
Chartered Architects  
Tŵll Dwrŷi, Goat Street  
St Davids, Pembrokeshire  
SA62 6RQ

**EMAIL DISCLAIMER**

Our email communications will contain personal data which will be stored safely. We will only use the data for project related documentation. We will not share with manufacturers, consultants or building contractors unless relevant for project related purposes. Individuals or organisations may request their personal data be amended or deleted if requested.



**Subject:** LDP 2, Version 2.

Dear Sir/ Madam

We have made several attempts to submit our client's response to the latest version on LDP 2. Regretfully the website will not allow us to do this. So as to ensure we do not pass the deadline we attach our response.

Please note document 921.LDP11.V2 is the master document.

We will however continue to try to access the response form via the website, so our response can be set out in your preferred format.

Yours sincerely

David D. Haward RIBA  
**David Haward Associates**  
Chartered Architects  
Twill Dwrgi, Goat Street  
St Davids, Pembrokeshire  
SA62 6RQ



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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](mailto:ldp@pembrokeshire.gov.uk) neu  
Y Tîm Cynlluniau Datblygu, Neuadd y Sir,  
Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

We would like your views on the Local Development Plan (LDP) and also on documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at <https://www.pembrokeshire.gov.uk/local-development-plan-review/deposit>

Please note: Representations made on the 2020 Deposit Plan will **not** be taken forward and it is necessary to make new representations on this current Deposit Plan.

If you are submitting a paper copy, attach additional sheets as necessary. This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received by midnight 16 December 2024. Please return forms to: [ldp@pembrokeshire.gov.uk](mailto:ldp@pembrokeshire.gov.uk) or The Development Plans Team, County Hall, Freeman's Way, Haverfordwest, Pembrokeshire SA61 1TP

**RHAN A: Manylion cysylltu**  
**PART A: Contact details**

Eich manylion/manylion eich cleient Your / your client's details		Manylion yr asiant (os ydynt yn berthnasol) Agent's details (if relevant)
Enw Name	REDACTED	David D Haward RIBA
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Architect
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	REDACTED	REDACTED
Cyfeiriad Address	REDACTED	REDACTED
Rhif ffôn Telephone no	Private	REDACTED
Email	Private	REDACTED
Llofnodwyd (gallwch teipio) Signed (can be typed)	David D Haward	
Dyddiad Date	16.12.2024	



## **RHAN B: Eich sylw**

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

*Eich enw / sefydliad*

Your name / organisation

David D Haward RIBA

David Haward Associates Chartered Architects

#### **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)

GN 16, G 17, GN 20, GN 45, GN 48,  
GN 51, HSG/029/00014, 029/00026 &  
Amenity Open Space.

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

Please refer to attached Statement.

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

Crundale

*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.

No

*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.

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.

<i>Dyraniad safle newydd</i> New site allocation	Yes – in part
<i>Polisi newydd</i> New policy	No
<i>Paragraff neu destun ategol newydd</i> New paragraph or supporting text	Yes

**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).**

<i>Enw'r safle</i> Site name	Rhoswell Park Crundale Haverfordwest Pembrokeshire
<i>Cyfeiriad y cais</i> Site reference	HSG/029/00014 & 029/00026. Field Numbers SM 9617 – 8878

*Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.*

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

### 5. Rhestrwch eich sylwadau isod.

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



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

**5. Please set out your comments below.**

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

*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.

Yes

**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 in Crundale.



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





## 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.

Statement

Relating to the

Omission of Candidate Site 343

for

Residential Development (Phase III+)

at

Part of Field No. SM 9617 - 8878

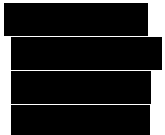
Rhoswell Park

Clarbeston Road

Crundale

Pembrokeshire

David Haward Associates Ltd  
Chartered Architects



March 2020

## **1.00 INTRODUCTION**

1.01 This statement has been prepared to object to the omission of Candidate Site No. 343.

1.02 Reference should be made to the application drawings:-

920.01 Location Plan

920.02 Site Plan, Indicative Layout

1.03 Reference should also be made to our original Statement Ref: 920.SoS.02A (August 2018) used in the submission Ref: 343 (Phase III+). This statement gave additional information which included a draft programme of a Scheme of Completions.

## **2.00 ADJACENT LAND USE**

- 2.01 Rhoswell was originally a farm comprising of the farmhouse, dairy and a number of agricultural outbuildings all of which were at the end of their economic life. This area forms Phase I.
- 2.02 Outline Planning Permission (OPP) Ref: 07/0924/PA dated 27 November 2009 gave planning permission for the development of 15 units, 5 on the old farm and 10 along the 'C' class road leading to Clarbeston Road. The OPP included both Section 105 Agreements for Infrastructure Contributions and 3 No. Affordable Housing units.
- 2.03 Part of the development included a ribbon strip of land along the main road (C3002) which contains the 10 units. This area forms Phase II.
- 2.04 Due to highway safety, the houses were accessed by a new estate road running parallel to the main road behind the houses, the houses being turned so that the rear gardens abut the main road. The new Estate Road runs almost the whole length of the development.
- 2.05 OPP, Condition 14 required access to the adjoining land for future development of Field No. SM 9617 - 8878 which has been incorporated in the Approval of Reserved Matters, the reference 11/0575/PA dated 2 March 2012 for Phase I and 12/0776/PA dated 18 April 2013 for Phase II.

### **3.00 EXCEPTIONAL INFRASTRUCTURE COSTS**

- 3.01 As with any new development, infrastructure costs are typically the estate road(s) and provision for services, being water supply, surface water drainage, foul water drainage and utility connections, which in this area are electricity and telephone services.
- 3.02 Due to the shape of the site, the estate road is almost the entire length of this linear site and having dwellings only on one side, substantially increases the infrastructure costs to each plot. Please refer to drawing No 920.02 Site Plan, Indicative Layout
- 3.03 A further complication is Welsh Water have a 14" cast iron Strategic Trunk Water Main under the length of the site which requires re-locating. Again this has significantly added to the infrastructure costs.

#### **4.00 DEVELOPMENT IMPLEMENTATIONS**

- 4.01 Prior to commencement of site operations a registered Ecologist supervised the relocation of some Pipistrelle bats under a Natural Resources Wales Licence.
- 4.02 Work commenced on site but had to be stopped due to concerns over the viability of the whole scheme.
- 4.03 The owners of the site had agreed provisional valuation for a number of plots but realised that these would not meet the infrastructure costs, including the construction of the adopted estate road. As a result, other options were investigated which included preliminary meetings with a number of both local and Cardiff area developers for a joint development. However these were not successful due to the prohibitive expensive infrastructure costs.



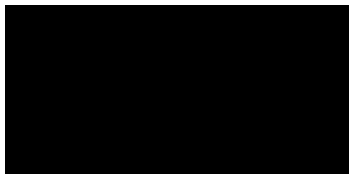
## **5.00 JUSTIFICATION FOR DEVELOPMENT**

- 5.01 The development of part of Field No. SM 9617 – 8878 will allow the exceptional costs of both the Estate Road and Strategic Trunk Water Main to be spread over a larger number of housing units.
- 5.02 The principle of development of this Candidate Site (No. 343) Phase III+ would thus allow the development of Phases I and II.
- 5.03 The development will not look out of place, as it utilizes the proposed estate road which under the current approvals appears rather odd, with a row of houses 'sandwiched' between two roads.
- 5.04 This Candidate Site passed both stages 1 and 2 of the assessment. However, the Site was screened out on i) highways and ii) loss of agricultural land.
- 5.05 Both of the above will be addressed in this Statement.
- 5.06 Highways  
The Site entrance is located on C3002, a C classification road within a 30 mph speed zone. The Site entrance position was agreed with the Highways Department and contained in Outline Planning Permission Ref: 07/0924/PA dated 27 November 2009. Furthermore Condition 14 required access to the adjacent land for further development. The principle of access for both the approved site and further development of the Field No. SM 9617 - 8878 have been agreed.
- 5.07 At present there is not a safe pedestrian access along Clarboston Road (C3002). The need for such access has in recent years greatly increased due to the new housing development off Dingle Lane and the new Ysgol Caer Elen School at Withybush. The approved site plan includes a pavement along the whole frontage of the development.
- 5.08 When the Candidate Sites were considered, the Highways Department were unaware that a start on site had been made but stopped due to queries arising due to the exceptional infrastructure costs.
- 5.09 We understand that Highways Department are willing to reconsider the site and the owners would be willing to link in the Candidate Site with the implementation of the current Planning Permissions.
- 5.10 Loss of Agricultural Land  
The land has an Agricultural Land Classification (ALC) of Grade 2. Grade 2 will have minor limitations which will affect crop yield. However, the loss of part of this field is minor and is outweighed by the benefits of including this Candidate Site. Furthermore, the minor loss of ALC Grade 2 is no worse than when considered in JUDP / LDP I.
- 5.11 In addition, there is a general shortage of housing in particular Affordable Housing as identified by the Housing Market Summary for Pembrokeshire. Referring to the said document, Crundale falls within Rudbaxton Community Council and requires 77 Affordable Houses in 2018, projected to 88 for 2035.
- 5.12 The current approved site contains 3 affordable houses and 26 in the Indicative Site Plan 920.02 Site Plan, Indicative Layout. This would obviously make a significant contribution in reducing the current shortfall of affordable housing in the local area.

## **6.00 Conclusion**

- 6.01 To conclude we consider that the planning approval to Phase II demonstrates the suitability of the site to be included in LDP2 and that the justification we set out in this Statement reinforces the suitability and advantage of including Candidate Site 343 within the Settlement Boundary; with good access by Public Transport to Haverfordwest as well as a safe public footpath/cycle route.
- 6.02 We are aware that an alternative Site was put forward for inclusion in LDP 2, located on the north-west edge of Crundale. This site has an area of 3.24 ha which being Agricultural Land would be a significant loss. The site also includes the nearby woodlands, which removes the boundary/buffer between the built environment and the natural landscape.

David Haward Associates  
Chartered Architects



Statement of Support

In Relation to the

Candidate Site Submission

for

Residential Development (Phase III+)

at

Field No. SM 9617 – 8878

Rhoswell Park

Clarboston Road

Crundale

Pembrokeshire

David Haward Associates Ltd



August 2018

## **1.00 INTRODUCTION**

- 1.01 This statement has been prepared in support of Field No. SM 9617 - 8878 being proposed as a Candidate Site for Residential Development.

## **2.00 ADJACENT LAND USE**

- 2.01 Rhoswell was originally a farm comprising of the farmhouse, dairy and a number of agricultural outbuildings all of which were at the end of their economic life. This area now forms Phase I.
- 2.02 Outline Planning Permission (OPP) Ref: 07/0924/PA dated 27 November 2009 gave planning permission for the development of 15 units, 5 on the old farm and 10 along the 'C' class road leading to Clarbeston Road. The OPP included both Section 105 Agreements for Infrastructure Contributions and 3 No. Affordable Housing units.
- 2.03 Prior to the above application being made, Pembrokeshire County Council, requested part of the development included a ribbon strip of land along the main road (C3002) which contains the 10 units. This area forms Phase II.
- 2.04 Due to highway safety, the houses were accessed by a new estate road running parallel to the main road behind the houses, the houses being turned so that the rear gardens abut the main road. The new Estate Road runs almost the whole length of the development.
- 2.05 OPP, Condition 14 required access to the adjoining land for future development of Field No. SM 9617 - 8878 which has been incorporated in the Approval of Reserved Matters, the reference 11/0575/PA dated 2 March 2012 for Phase I and 12/0776/PA dated 18 April 2013 for Phase II.

### **3.00 EXCEPTIONAL INFRASTRUCTURE COSTS**

- 3.01 As with any new development, infrastructure costs are typically the estate road(s) and provision for services, being water supply, surface water drainage, foul water drainage and utility connections, which in this area are electricity and telephone services.
- 3.02 Due to the shape of the site, the estate road is almost the entire length of this linear site and is accessed only from one side, thus substantially increasing the infrastructure costs to each plot.
- 3.03 A further complication is Welsh Water have a 14" cast iron Strategic Trunk Water Main under the length of the site which requires re-locating. Again this has significantly added to the infrastructure costs.



#### **4.00 DEVELOPMENT IMPLEMENTATIONS**

- 4.01 Prior to commencement of site operations a registered Ecologist supervised the relocation of some Pipistrelle bats under a Natural Resources Wales Licence.
- 4.02 Work commenced on site but had to be stopped due to concerns over the viability of the whole scheme.
- 4.03 The owners of the site had agreed provisional valuation for a number of plots but realised that these would not meet the infrastructure costs, including the construction of the adopted estate road. As a result, other options were investigated which included preliminary meetings with a number of local developers for a joint development. However these were not successful due to the prohibitive expensive infrastructure costs.

## **5.00 JUSTIFICATION FOR DEVELOPMENT**

- 5.01 The development of Field No. SM 9617 – 8878 will allow the exceptional costs of both the Estate Road and Strategic Trunk Water Main to be spread over a larger number of housing units.
- 5.02 The principle of development of Phase III would thus allow the development of Phases I and II.
- 5.03 The development will not look out of place, as it utilizes the proposed estate road which under the current approvals appears rather odd with a field boundary.

## 6.00 RESIDENTIAL DEVELOPMENT


- 6.01 The site area is approximately 2.99 ha which at 30 units per ha equates to 90 units. Assuming 25% affordable housing, the development would provide 67 open market housing units and 23 affordable housing units.
- 6.02 As the development of Phases I and II are dependent on Phase III being implemented at the same time, it is the owner's intention to develop the whole site in one operation to obtain the benefits of economies of scale.
- 6.03 As the development of both Phases I & II are on hold, due to the exceptional infrastructure the inclusion of this Candidate Site would actually provide a gross gain of 105 housing units, comprising of 26 Affordable Housing Units and 79 Open Market housing units.
- 6.04 A draft programme is set out below, OM is Open Market Units and AHU is Affordable Housing Unit:-

Ref	Trigger	Date(s)	Const. Phase	Build Plots	Market Type	Activity / Remarks
1	Adoption of LDP 2	2021	I and II	All	N/A	Trunk Main, Utilities, Estate Road
2	Adoption of LDP 2	2021	I	1-3	OM	High Interest in these larger plots
3	Completion of 3 OM plots	2021/2022	II	1	AHU	Construction and Handover to RSL
4	Completion of 1 or more AHU	2021/2022	I	4-5	OM	Phase I completed.
5	Completion of Phase I	2021/2022	II	Any plot 1	OM	Location subject to sales
6	Completion of 6 OM plots	2021/2022	II	2	AHU	Construction and Handover to RSL
7	Completion of 2nd AHU	2021/2022	II	Any plots	OM	Location subject to sales
8	Completion of 9 OM plots	2022 On	II	3	AHU	Construction and Handover to RSL
9	Completion of 3 <sup>rd</sup> AHU	2022 On	II	Any plots	OM	Location subject to sales
10	Completion of Phase II	2022 On	II	4 - 11	OM	Location subject to sales
11	Commencement of Phase III	2023 On	III	TBA	OM/AHU	Subject to Planning Permission

## **7.00 SITE LAYOUT**

- 7.01 An indicative site layout has been prepared, please refer to Architect's Drawing No. 920.02 Site Plan.
- 7.02 Assess to the surrounding fields for future development could be incorporated in the final design.
- 7.03 The completion of negotiations with the Utility Companies for Phase I and II has demonstrated the viability of Phase III.
- 7.05 Access to the site will be via Phase II in accordance with the OPP.

David Haward Associates  
Chartered Architects



Statement of Support

In Relation to the

Candidate Site Submission

for

Residential Development (Phase III)

at

Part of Field No. SM 9617 – 8878

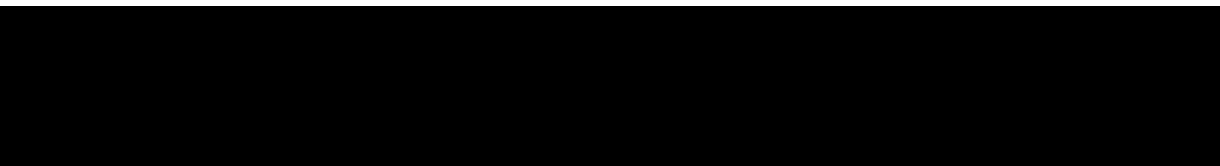
Rhoswell Park

Clarbeston Road

Crundale

Pembrokeshire

David Haward Associates Ltd



August 2018

## **1.00 INTRODUCTION**

- 1.01 This statement has been prepared in support of Part of Field No. SM 9617 - 8878 being proposed as a Candidate Site for Residential Development.



## **2.00 ADJACENT LAND USE**

- 2.01 Rhoswell was originally a farm comprising of the farmhouse, dairy and a number of agricultural outbuildings all of which were at the end of their economic life. This area now forms Phase I.
- 2.02 Outline Planning Permission (OPP) Ref: 07/0924/PA dated 27 November 2009 gave planning permission for the development of 15 units, 5 on the old farm and 10 along the 'C' class road leading to Clarbeston Road. The OPP included both Section 105 Agreements for Infrastructure Contributions and 3 No. Affordable Housing units.
- 2.03 Prior to the above application being made, Pembrokeshire County Council, requested part of the development included a ribbon strip of land along the main road (C3002) which contains the 10 units. This area forms Phase II.
- 2.04 Due to highway safety, the houses were accessed by a new estate road running parallel to the main road behind the houses, the houses being turned so that the rear gardens abut the main road. The new Estate Road runs almost the whole length of the development.
- 2.05 OPP, Condition 14 required access to the adjoining land for future development of Field No. SM 9617 - 8878 which has been incorporated in the Approval of Reserved Matters, the reference 11/0575/PA dated 2 March 2012 for Phase I and 12/0776/PA dated 18 April 2013 for Phase II.

### **3.00 EXCEPTIONAL INFRASTRUCTURE COSTS**

- 3.01 As with any new development, infrastructure costs are typically the estate road(s) and provision for services, being water supply, surface water drainage, foul water drainage and utility connections, which in this area are electricity and telephone services.
- 3.02 Due to the shape of the site, the estate road is almost the entire length of this linear site and is accessed only from one side, thus substantially increasing the infrastructure costs to each plot.
- 3.03 A further complication is Welsh Water have a 14" cast iron Strategic Trunk Water Main under the length of the site which requires re-locating. Again this has significantly added to the infrastructure costs.

#### **4.00 DEVELOPMENT IMPLEMENTATIONS**

- 4.01 Prior to commencement of site operations a registered Ecologist supervised the relocation of some Pipistrelle bats under a Natural Resources Wales Licence.
- 4.02 Work commenced on site but had to be stopped due to concerns over the viability of the whole scheme.
- 4.03 The owners of the site had agreed provisional valuation for a number of plots but realised that these would not meet the infrastructure costs, including the construction of the adopted estate road. As a result, other options were investigated which included preliminary meetings with a number of local developers for a joint development. However these were not successful due to the prohibitive expensive infrastructure costs.

## **5.00 JUSTIFICATION FOR DEVELOPMENT**

- 5.01 The development of part of Field No. SM 9617 – 8878 will allow the exceptional costs of both the Estate Road and Strategic Trunk Water Main to be spread over a larger number of housing units.
- 5.02 The principle of development of Phase III would thus allow the development of Phases I and II.
- 5.03 The development will not look out of place, as it utilizes the proposed estate road which under the current approvals appears rather odd, with a field boundary.

## 6.00 RESIDENTIAL DEVELOPMENT

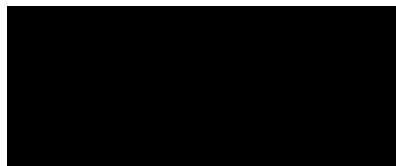
- 6.01 The site area is approximately 0.485 ha which at 30 units per ha equates to 15 units. Assuming 25% affordable housing, the development would provide 11 open market housing units and 4 affordable housing units.
- 6.02 As the development of Phases I and II are dependent on Phase III being implemented at the same time, it is the owner's intention to develop the whole site in one operation to obtain the benefits of economies of scale.
- 6.04 A draft programme is set out below, OM is Open Market Units and AHU is Affordable Housing Unit:-

Ref	Trigger	Date(s)	Const. Phase	Build Plots	Market Type	Activity / Remarks
1	Adoption of LDP 2	2021	I and II	All	N/A	Trunk Main, Utilities, Estate Road
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10	Completion of Phase II	2022 On	II	4 - 11	OM	Location subject to sales
11	Commencement of Phase III	2023 On	III	TBA	OM/AHU	Subject to Planning Permission

## **7.00 SITE LAYOUT**

- 7.01 An indicative site layout has been prepared, please refer to Architect's Drawing No. 921.02 Site Plan.
- 7.02 Access to remainder of the field has been retained for future development.
- 7.03 The completion of negotiations with the Utility Companies for Phase I and II has demonstrated the viability of Phase III.
- 7.05 Access to the site will be via Phase II in accordance with the OPP.

David Haward Associates  
Chartered Architects





Statement

Relating to Part of Field No. SM 9617 - 8878

for

Residential Development (Phase III)

at

Rhoswell Park  
Chapel Road  
Crundale  
Haverfordwest  
Pembrokeshire

David Haward Associates Ltd  
Chartered Architects



December 2024



## 1.00 INTRODUCTION

1.01 This statement has been prepared to object to the omission of Candidate Site No. 267/343 and the inclusion of the Amenity Open Space.

1.02 Several field/ site numbers have been given, as the field has been sub-divided by the existing Planning Permissions as well as two proposed Candidate Sites, relating to Phase III and Phase III+. Phases I & II have planning permission.

1.03 To assist in reading of this report projected dwelling numbers are set out below:-

Phase I 5 Dwellings with Planning Permission (6 Dwellings if infilling is allowed, as proposed in LDP 2 V2).

Phase II 10 Dwellings with Planning Permission (Including 3 Affordable Homes).

Phase III 15 Dwellings (Including 5 Affordable Homes), or  
Phase III+118 Dwellings (Mix of AH and OM to be agreed).

1.03 This Statement of support should read with the drawings listed below:-

783.12H Site Plan (Phases I & II)

920.01 Location Plan (Phase III+)

920.02 Indicative Site Layout (Phase III+)

921.01 Location Plan (Phase III)

921.02 Indicative Site Layout (Phase III)

1.04 Whilst LDP 2 V2 Deposit advises Candidate Site submissions should be new, documents used in conjunction with early representations are included for background information and should be referred to and are attached.

These are:-

- i) Architects drawings listed above. Drawings are attached.
- ii) Statement of Support – Phase III (Ref: 921.02A, dated 14.08.18)
- iii) Statement of Support - Phase III+ (Ref: 920.02, dated 14.08.18)
- iv) Statement of Support – Phase III+ (Ref: 920.03, dated 17.03.20)

## **2.00 ADJACENT LAND USE**

- 2.01 Rhoswell was originally a farm comprising of the farmhouse, dairy and a number of agricultural outbuildings all of which were at the end of their economic life. This area forms Phase I.
- 2.02 Outline Planning Permission (OPP) Ref: 07/0924/PA dated 27 November 2009 gave planning permission for the development of 15 units, 5 on the old farm and 10 along the 'C' Class road leading to Clarboston Road, referred to locally as Chapel Road. The OPP included both Section 105 Agreements for Infrastructure Contributions and 3 No. Affordable Housing units.
- 2.03 Part of the development included a ribbon strip of land along the Chapel Road (C3002) which contains the 10 units. This area forms Phase II.
- 2.04 Due to highway safety, the houses were accessed by a new estate road running parallel to the main road behind the houses, the houses being turned so that the rear gardens abut the main road. The new Estate Road runs almost the whole length of the development.
- 2.05 OPP, Condition 14 required access to the adjoining land for future development of Field No. SM 9617 - 8878 which has been incorporated in the Approval of Reserved Matters, the references being 11/0575/PA dated 2 March 2012 for Phase I and 12/0776/PA dated 18 April 2013 for Phase II.

### **3.00 EXCEPTIONAL INFRASTRUCTURE COSTS**

- 3.01 As with any new development, infrastructure costs are typically the estate road(s) and provision for services, being water supply, surface water drainage, foul water drainage and utility connections, which in this area are electricity and telephone services.
- 3.02 Due to the shape of the site, the estate road is almost the entire length of this linear site and having dwellings only on one side, substantially increases the infrastructure costs to each plot. Please refer to drawing No 783.12H Site Plan.
- 3.03 A further complication is Welsh Water have a 14" cast iron Strategic Trunk Water Main under the length of the site which requires re-locating. Again this has significantly added to the infrastructure costs.

#### **4.00 DEVELOPMENT IMPLEMENTATIONS**

- 4.01 Prior to commencement of site operations a registered Ecologist supervised the relocation of some Pipistrelle bats under a Natural Resources Wales Licence.
- 4.02 Work commenced on site but had to be stopped due to concerns over the viability of the whole scheme.
- 4.03 The owners of the site had agreed provisional valuation for a number of plots but realised that these would not meet the infrastructure costs, including the construction of the adopted estate road. As a result, other options were investigated which included preliminary meetings with a number of both local and Cardiff area based developers for a joint development. However these were not successful due to the prohibitive expense of the infrastructure costs.

## 5.00 JUSTIFICATION FOR DEVELOPMENT

- 5.01 Both Welsh Government (WG) and Pembrokeshire County Council have carried out studies, regarding the projected number of new homes required for both, Affordable and Open Market. The most recent being the Local Housing Market Assessment (LHMA) in July 2021. This identified 34 (Open) Market, 9 Intermediate and 9 Social Rented. All tenures is listed as (Sic) 53.
- 5.02 In addition, a good indication of the local housing market is the availability and cost of both rented and open market properties. House inflation is driven by a shortage of either type. Whilst house sale inflation is rather muted, rental market has experienced large increases for several years. Evidence of this is obvious, but can be provided if required.
- 5.03 The LDP 2 V2 states in 4.11 *“Historical under-development of dwellings between 2017 - 23.”* It goes on to advise that a significant backlog of affordable housing need, was identified in Local Housing Market Assessment 2022.
- 5.04 The Deposit version goes on to say in 4.16 *“The need for affordable housing in Pembrokeshire is so high that it is considered too great on which to build a target”*
- 5.05 Rural Settlements have been broken down into various categories, 2b are Service Villages, which Crundale is listed.
- 5.06 Crundale forms part of the Rudbaxton Community Council, which includes Rudbaxton itself, Rudbaxton Water, Poyston Cross and Bethlehem. Housing need is described as the Community as a whole.
- 5.07 The community is somewhat dispersed but Crundale is within reasonable distance of Haverfordwest which offers employment opportunities as well as Schools, Shopping and Medical facilities.
- 5.08 Out of the dispersed settlements only Crundale has good sustainable transport links, by either public transport or simply walking/ cycling.
- 5.09 Discussions between the land owners and PCC has resulted of an in principal agreement to form a pavement along Chapel Road and extend it beyond so as to link up with the recently constructed footpaths/ shared use paths which lead into Haverfordwest.
- 5.10 Previous Candidate Site submissions has indicated the difficulties in developing the site, namely the cost of constructing the estate road, bringing in new utility services and relocating the water main.

## **6.00 LOCAL DEVELOPMENT PLAN II (Version 2)**

- 6.01 Previously concerns have been made over the loss of Agricultural Land and the increase of traffic onto Chapel Road.
- 6.02 The current LDP II accepts that to meet the housing needs of Pembrokeshire some loss of Agricultural land is inevitable and has agreed in principal that the proposed sites for Phase II and III can be utilised for Housing.
- 6.03 It is also welcome that the small section of site used for Plot 3 (please refer to drawing 783.12H) is incorporated within the development.
- 6.04 What is disappointing is the introduction of a green open space along Chapel Road, which effectively destroys the whole development, both in terms of work carried out to date and making the development financially sound.
- 6.05 It would appear that the existing Water Trunk Main is to be retained in its current position with the 5.000 metre exclusion zone either side. The boundary of the exclusion zone will now form the new north boundary to the development. The existing planning permissions appears to have been ignored.
- 6.06 It would also appear that little regard has been given to the landowners costs of developing the site or their commitment to the development in instigating Ecology requirements, demolishing the farmhouse and outbuildings, clearing the site and making a material start on site.
- 6.07 Referring to the original Planning Permission, this was by an Outline Planning Permission Ref: 07/0924/PA dated 27.11.09. Condition 5 required that the subsequent application for Reserved Matters (RM) should be submitted in Phases.
- 6.08 Phase I, Ref: 11/0575/PA was approved on 02.03.2012. Phase II, Ref: 18.04.2013 was approved on 18.04.2013.
- 6.09 In order that work could commence on site Building Regulation Plan Approval and/or Notice must be given, usually simply referred to as Building Regulations. The original dwelling being the Farmhouse was demolished using DM/0442/11 dated 30.09.2011. Further applications have been made, BR/0064/12 dated 15.06.12, BR/0262/13 dated 24.07.13 and BN/0442/11 made on 30.09.11.
- 6.10 From the above it is obvious that the site owners have been committed to the development and that the Planning Permissions are extant.
- 6.11 Despite the inclusion of an Amenity Open Space, the Strategic Trunk Water Main would still prevent development, in that it is too high to be built over. The cost of lowering the required section would not be a great deal less than relocating it. This is partly as it is relatively simple to install a new pipe along a different route so that it can be installed and tested before the final connections are made to the existing trunk main.
- 6.12 Highways have previously objected to the traffic increase along Chapel Road. However, at the time of consultation, the 20mph in built up areas had yet to be implemented. Chapel Road, Dingle Lane and the B4329 which pass through Crundale village all have the benefit of these traffic calming measures.
- 6.13 Should Highways still have concerns, it is suggested that other traffic calming measures could be undertaken. For example the use of a chicane, similar to the one used further into Haverfordwest at Prendergast.

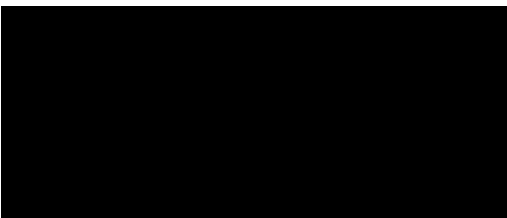
- 6.14 We believe that to make this development viable, the existing approved sites should be retained and the additional area allowed to create Phase III.
- 6.15 Should the authority be mindful to retain the open space, then the area of the new site should be increased in depth to allow development either side of the Estate Road. We would suggest 60.000 metre depth as a minimum, which would allow an estate road with footpaths and dwellings both sides of the road.



## **7.00 CONCLUSION**

- 7.01 To conclude it is considered that the site offers a location that is near to Haverfordwest, will have safe pedestrian access from the village of Crundale into Haverfordwest. Furthermore, it well severed by public transport and will make a significant contribution to meeting the need of both affordable and open market housing in Rudbaxton Community Council area.

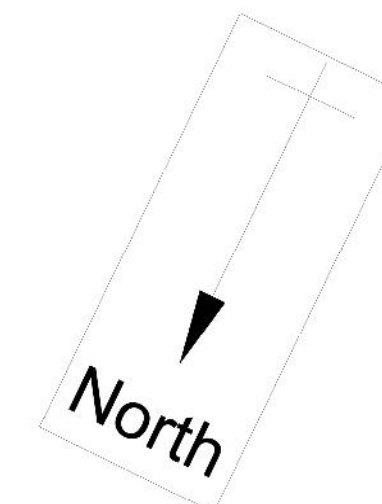
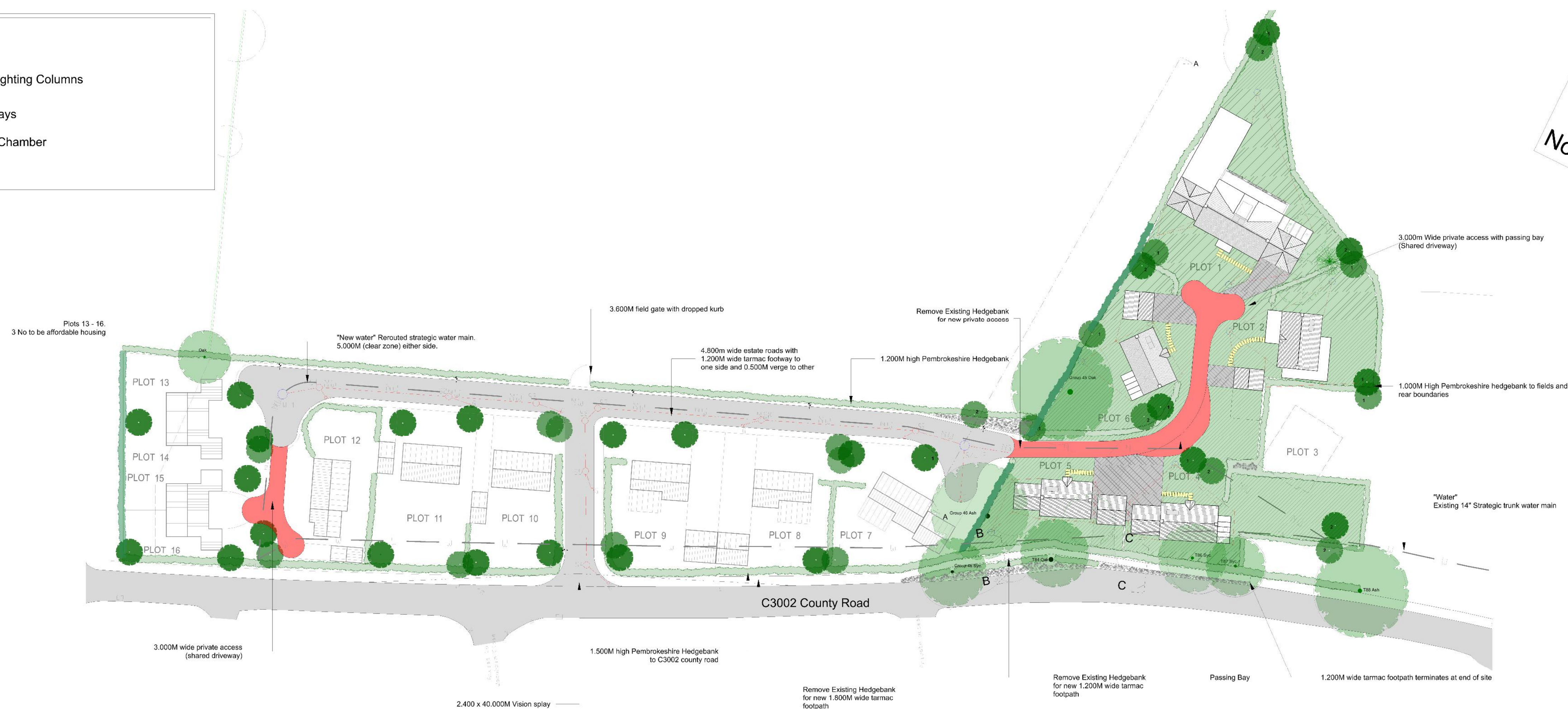
David Haward Associates  
Chartered Architects





NOTES

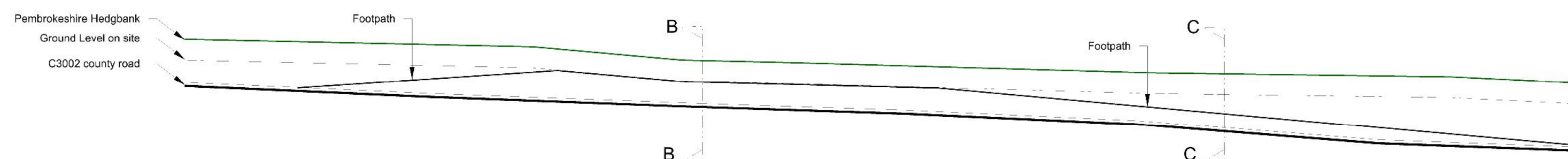
- Street Lighting Columns
- Soakaways
- Access Chamber



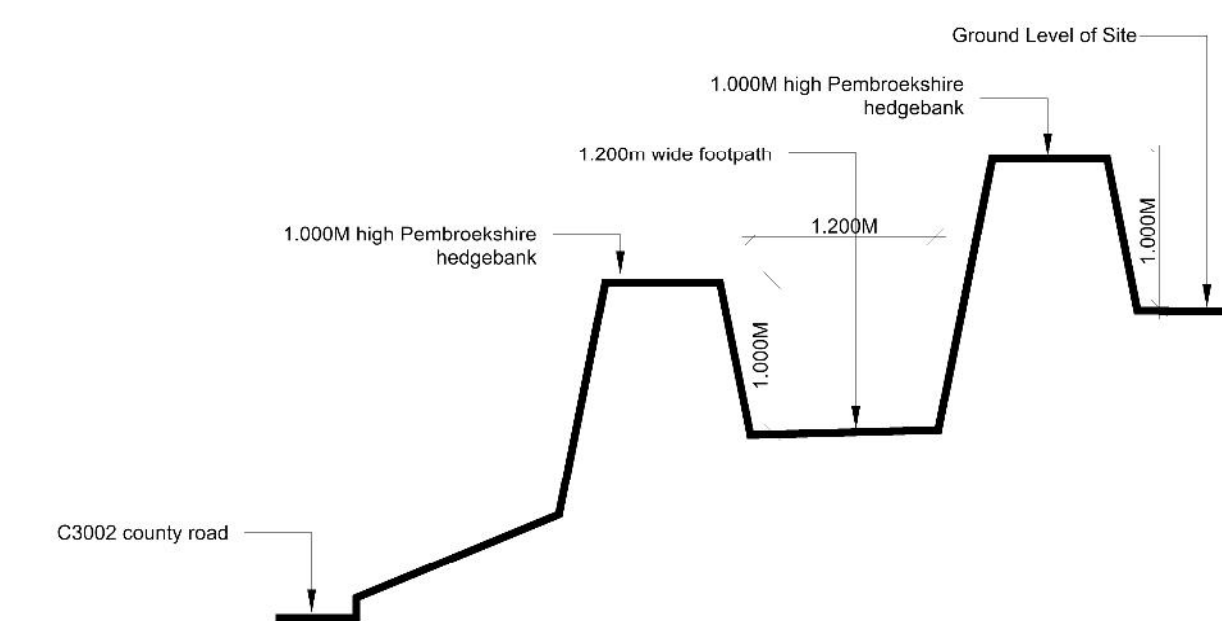
PHASE I. PLOTS 1 - 6

PHASE II. PLOTS 7 - 16

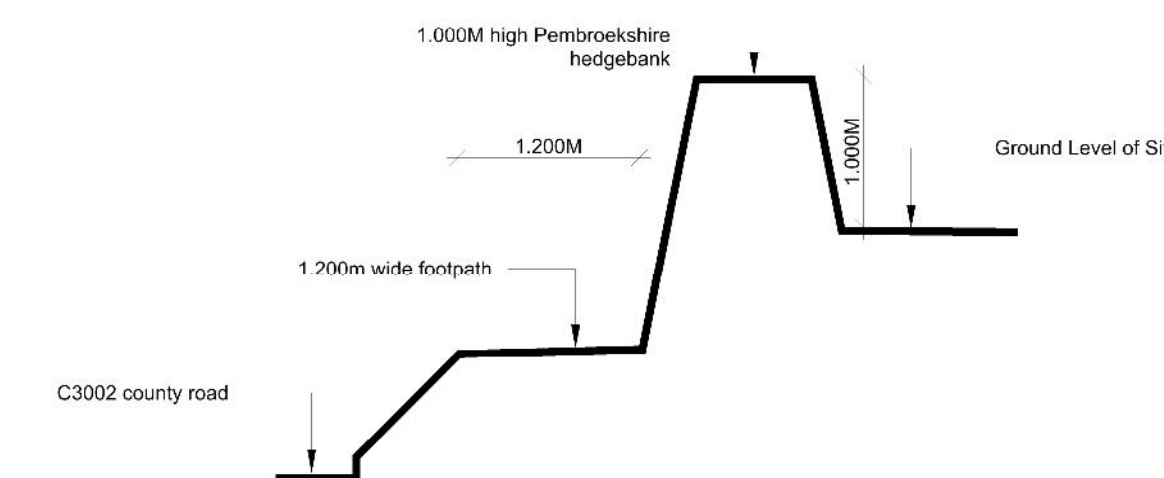
SITE PLAN  
1:500



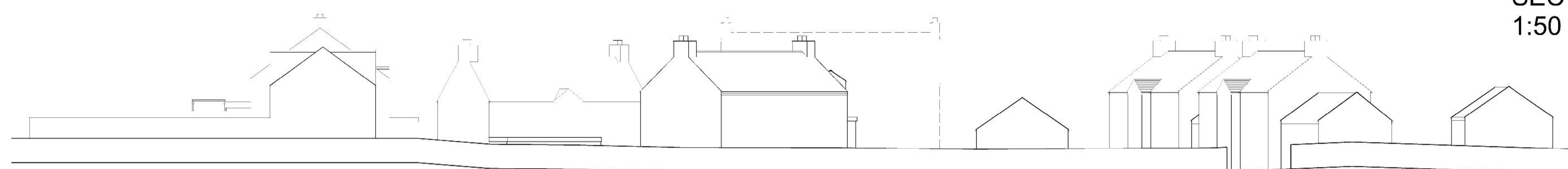
ELEVATION OF RAISED FOOTPATH BEHIND PLOTS 4 & 5  
1:200



SECTION B - B  
1:50



SECTION C - C  
1:50



SCHEMATIC SITE SECTION A - A  
1:200

H	Site plan amended	31/01/12
G	Hedgebanks amended	19/01/12
	Footpath Altered	
	Elevation and sections added of Footpath	
	Abstract of tree preservation order added	
	Entrance to field altered	
F	Hedgebanks & soakaways altered	03/01/12
E	Plot 3 omitted	19/12/11
D	Note added on what existing hedges are to be removed & Soakaways added	11/11/11
C	Surface Materials, street lighting & site section added	14/10/11
B	Minor amendments	08/09/11
A	Minor amendments	05/09/11

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PROJECT  
Residential Development  
RHOSWELL  
CLARBESTON ROAD  
CRUNDALE  
PEMBROKESHIRE

DRAWING  
SITE PLAN - PHASES I & II  
SCHEMATIC SITE SECTION

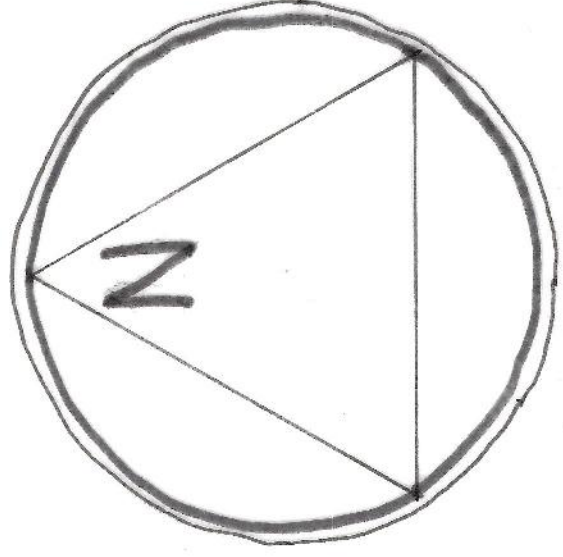
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DRAWING NO.

783 - 12H

DO NOT SCALE. USE ONLY FIGURED DIMENSIONS. CONTRACTORS/SUPPLIERS TO CHECK ALL DETAILS, DIMENSIONS AND LEVELS ON SITE BEFORE COMMENCING SITE OPERATIONS OR MANUFACTURING OF COMPONENTS. THIS DRAWING IS INTELLECTUAL PROPERTY AND IS COPYRIGHTED.

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PROJECT  
RESIDENTIAL DEVELOPMENT  
(PHASE III) RHOSWEN PARK  
CRUNPALE  
PEMBROKESHIRE

DRAWING

SITE PLAN - INDICATIVE LAYOUT  
(FIELD NO: SM 9617-8878)

DATE: JULY 2018 DRAWN: DDH

SCALE: 1:500 @ A1

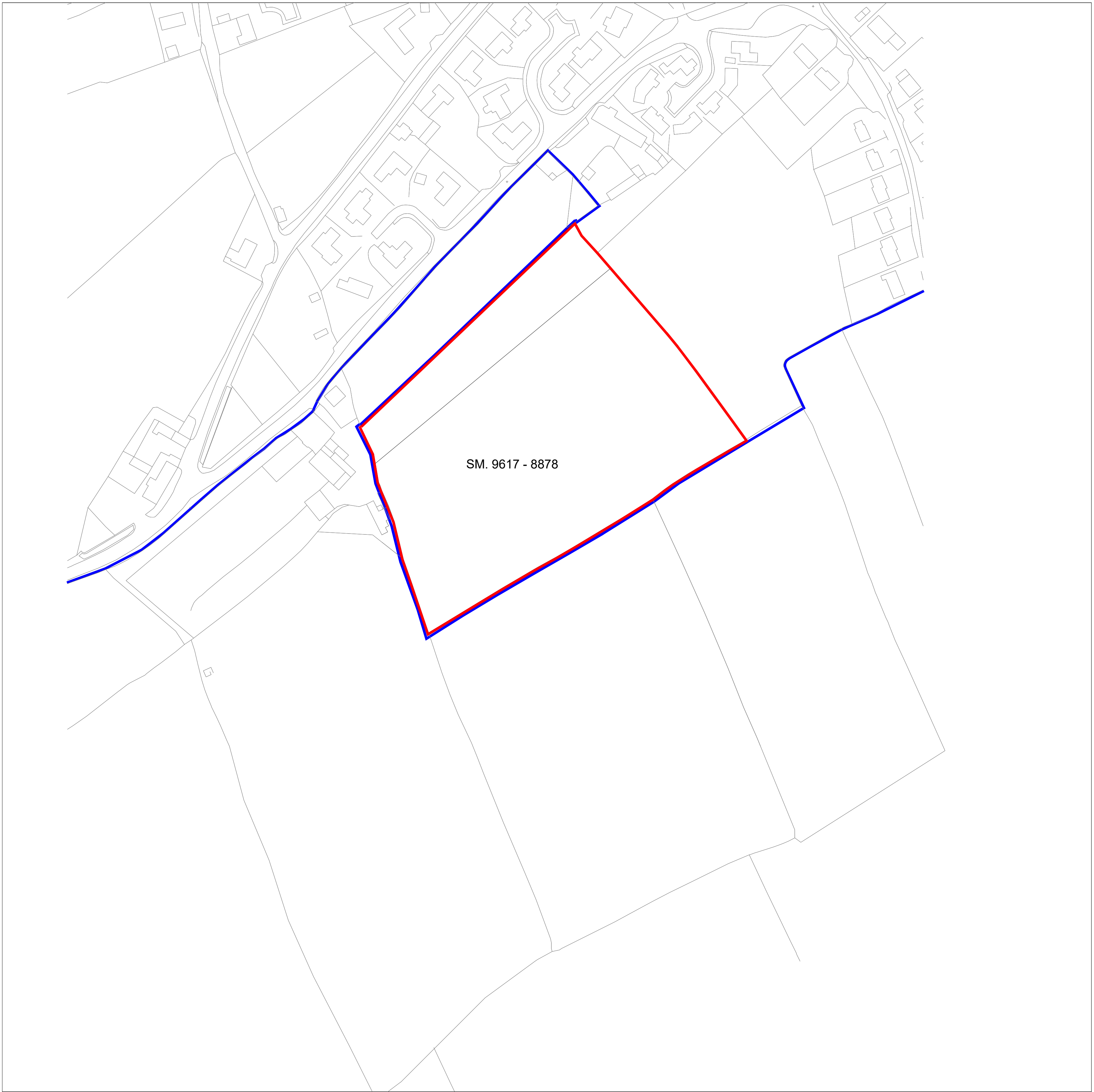
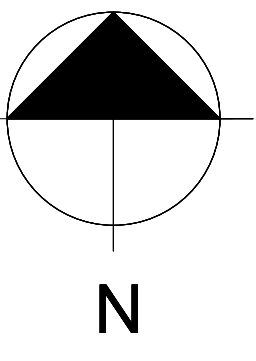
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920-02

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PROJECT  
**Residential Development  
(Phase III+)  
RHOSWELL PARK  
CRUNDALE  
PEMBROKESHIRE**

DRAWING

**LOCATION PLAN**

DATE July 2018 DRAWN ACN

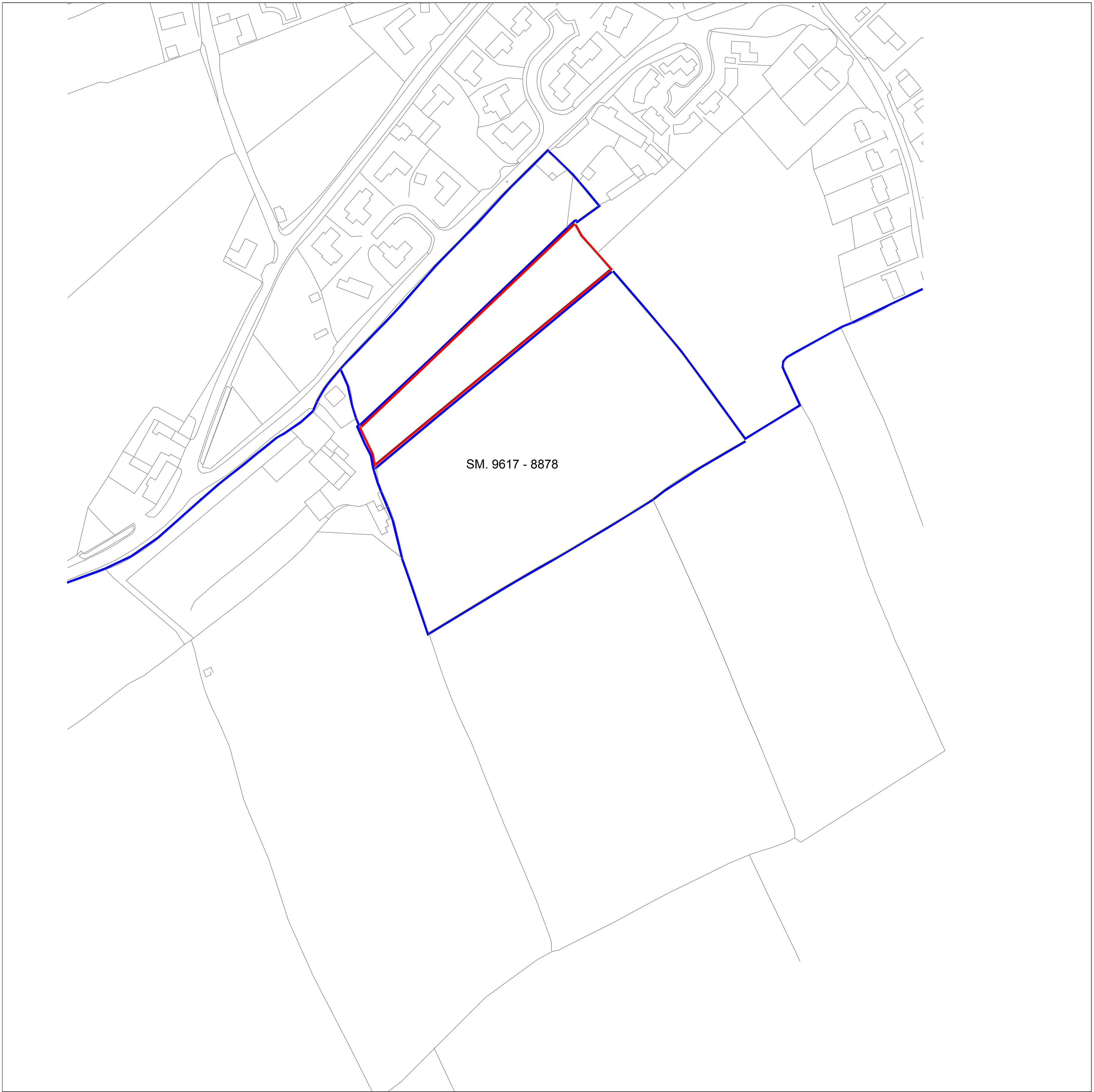
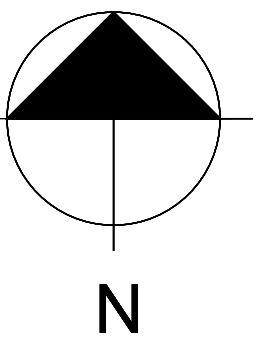
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DRAWING NO.

**920 - 01**

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PROJECT  
**Residential Development  
(Phase III)  
RHOSWELL PARK  
CRUNDALE  
PEMBROKESHIRE**

DRAWING

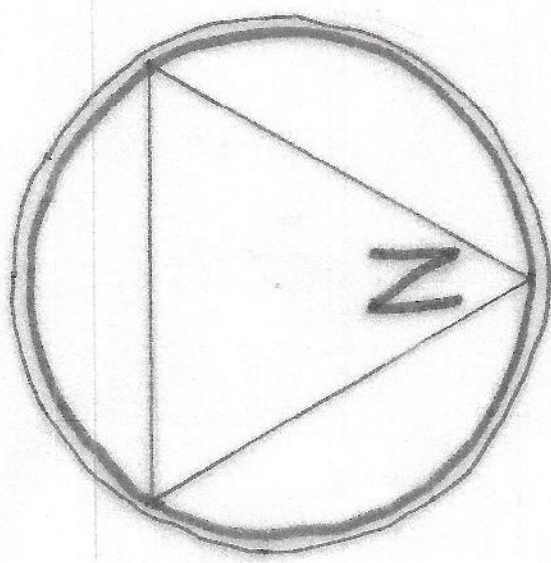
**LOCATION PLAN**

DATE	July 2018	DRAWN	ACN
SCALES	1:1250 @ A1		
DRAWING NO.			

**921 - 01**

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Key to Phase III:

PLOT No.	Architect House Type	Dwelling Type	Occupancy/ Unit Type
01	A	2 Bed / 4p SD	AH
02	Ah	2 Bed / 4p SD	AH
03	Ah	2 Bed / 4p SD	AH
04	A	2 Bed / 4p SD	AH
05	Ah	2 Bed / 4p SD	AH
06	B	3 Bed / 5p SD	OM
07	Bh	3 Bed / 5p SD	OM
08	Bh	3 Bed / 5p SD	OM
09	Bh	3 Bed / 5p SD	OM
10	Ch	4 Bed / 8p D	OM
11	Bh	3 Bed / 5p SD	OM
12	B	3 Bed / 5p SD	OM
13	D	4 Bed / 8p D	OM
14	E	4 Bed / 8p D	OM
15	En	4 Bed / 8p D	OM

Layout, house type, mix and occupancy are indicative. Actual proposals dependent on Local Development Plan II policies, social land requirements and local market conditions.

Dwelling type includes reference for Semi Detached (SD) and Detached (D) and Terrace (T). Occupancy types are Affordable Housing (AH) and Open Market (OM).



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PROJECT  
RESIDENTIAL DEVELOPMENT  
(Phase III) Rhydowen Park  
CUNYDRE  
PEMBROKESHIRE

DRAWING  
Site Plan - Indicative Layout  
(Part of Field No. SM4617-2278)

DATE: July 2018  
SCALE: 1:500 @ A1  
DRAWN: DDH

921-02

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