

Emma Evans

From: [REDACTED]
Sent: 10 December 2024 12:54
To: LDP - For Enquiries
Cc: Office Administrator
Subject: Pembrokeshire County Council Local Development Plan 2 - Deposit LDP 2
Attachments: HILL MOUNTAIN SITE LAYOUT PLAN.pdf; Comments Form - Land Adj to Brackenhurst, Hill Mountain.pdf; Comments Form - Land North of Hayston View, Johnston.pdf; Comments Form - Land East of Poppy Drive, Neyland.pdf; Alternative Site Report - Land at Hill Mountain, Pembrokeshire.pdf; HILL MOUNTAIN SITE LOCATION PLAN.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: D Rep

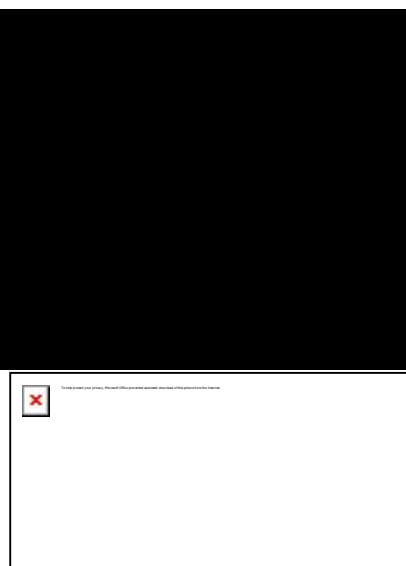
EXTERNAL EMAIL – Exercise care with links and attachments *E-BOST ALLANOL – Byddwch yn ofalus wrth agor dolenni ac atodiadau.*

Good afternoon,

Further to the recent publication of the Deposit 2 version of the Pembrokeshire LDP2, please find attached a submission with respect to an Alternative Site objection in relation to adjacent to Brackenhurst, Hill Mountain. In conjunction with this, please also find the completed forms for further objections to 2 Residential Allocations in Johnston and Neyland.

We trust that the above and attached are in order, but should you have any questions or queries, please do not hesitate to contact me.

Kind Regards





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		Jason Evans
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		
Cyfeiriad Address	c/o Agent	
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)		
Dyddiad	10/12/2024	



Date			
RHAN B: Eich sylw			
PART B: Your representation			
Eich enw / sefydliad Your name / organisation	Mr M and Mr J Morrillo c/o Evans Banks Planning Ltd		
1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau? 1. Which part(s) of the Plan (or supporting documents) are you commenting on?			
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	GN16 – Residential Allocations		
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>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> 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. <i>For more information on soundness and procedural requirements, see the guidance notes.</i>			
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.			
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed.	X		
Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. I think that the procedural requirements have not been met.			
3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?			



Ticiwch bob un sy'n berthnasol.

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

Tick all that apply.

Dyraniad safle newydd

New site allocation

X

Polisi newydd

New policy

Paragraff neu destun ategol newydd

New paragraph or supporting text

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

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

Enw'r safle

Site name

Land adjacent to Brackenhurst, Hill Mountain

Cyfeiriad y cais

Site reference

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

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

5. Rhestrwch eich sylwadau isod.

Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/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.

Please see accompanying Alternative Site Supporting 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.

Please see accompanying Alternative Site Supporting Statement.

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.

I want to speak at a public hearing.

X



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').

Policy GN17

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.

Rwy'n dymuno cael fy nghlywed yn Saesneg.

I wish to be heard in English.

X



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.

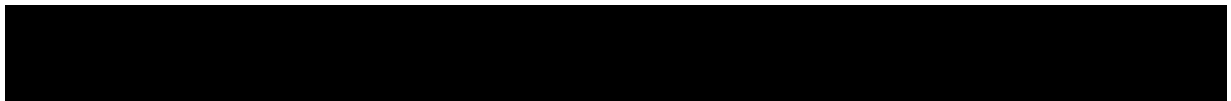


ALTERNATIVE SITE SUPPORTING STATEMENT
FOR
PEMBROKESHIRE LOCAL DEVELOPMENT PLAN 2017-
2033 – DEPOSIT 2

LAND ADJACENT TO BRACKENHURST, HILL MOUNTAIN,
PEMBROKESHIRE

On behalf of
M and J Morrillo

Our Ref: 1814.a
Date: December 2024
Prepared by: JDE



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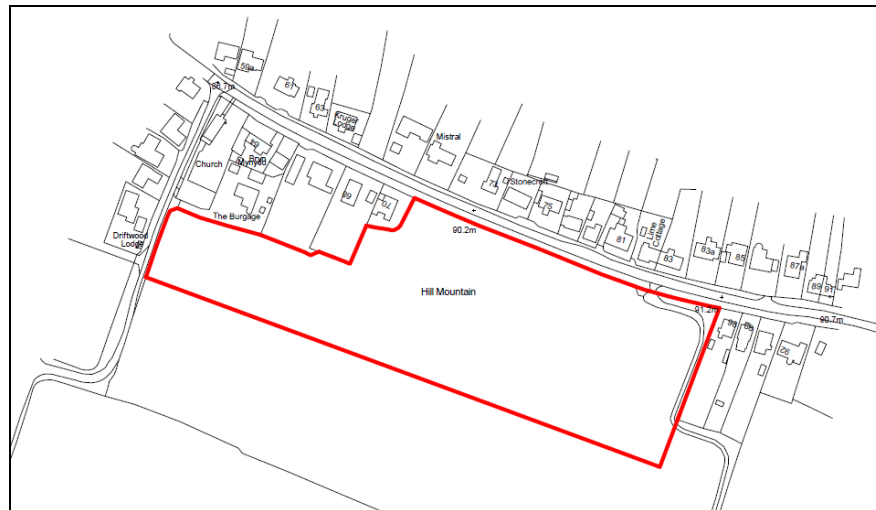
1.0 INTRODUCTION

- 1.1 Evans Banks Planning has been instructed by Mr M and J Morillo to prepare and submit an Alternative Site Supporting Statement for the allocation of land adjacent to Brackenhurst, Hill Mountain, Pembrokeshire for the purposes of residential development in the forthcoming Pembrokeshire Local Development Plan 2. The majority of the land had been previously put forward as a Candidate Site for allocation within the LDP during the call for Candidate Sites, under references CS 422, CS 424 and CS 425.
- 1.2 This Report has been prepared in response to the publication of the Pembrokeshire Local Development Plan 2 - Deposit 2 Plan (hereinafter referred to as the 'Deposit 2 LDP') by the local planning authority (LPA) and has been prepared in line with the LPAs guidance published as part of its Deposit 2 LDP Representation Form. As a result, following a brief description of the Site and its proposed use, the following information and assessment is provided:
- Commentary on the proposals for housing development in the local area
 - Review and comment on LPA assessment of Site at Candidate Site Stage
 - Compatibility of proposal with LDP Strategy
- 1.3 The Report then concludes with a summary of the information presented.
- 1.4 It should also be noted that this Report should be read in conjunction with objections lodged against a number of proposed Allocations for the local area by Evans Banks Planning Ltd.

2.0 SITE CONTEXT

2.1 THE SITE

- 2.1.1 The Candidate Site relates to an area of land that forms part of a larger agricultural enclosure, measuring approximately 2.6ha in area and edged red on Plan A below.



Plan A

- 2.1.2 As can be seen from Photograph 1, the land is level in nature and is currently used for general grazing purposes, but has in the past also been used for the purposes of growing a potato crop.



Photograph 1

2.1.3 The site's northern eastern and western boundaries are defined by mature hedgerows, shared with existing residential development or the public highway running through the settlement. Its remaining southern boundary is then currently undefined, leading on to the remainder of the agricultural enclosure it forms part of.

2.1.4 Vehicular access to the Site is gained via two agricultural gateways leading directly onto the aforementioned public highway, with visibility in both directions excellent, as illustrated below.

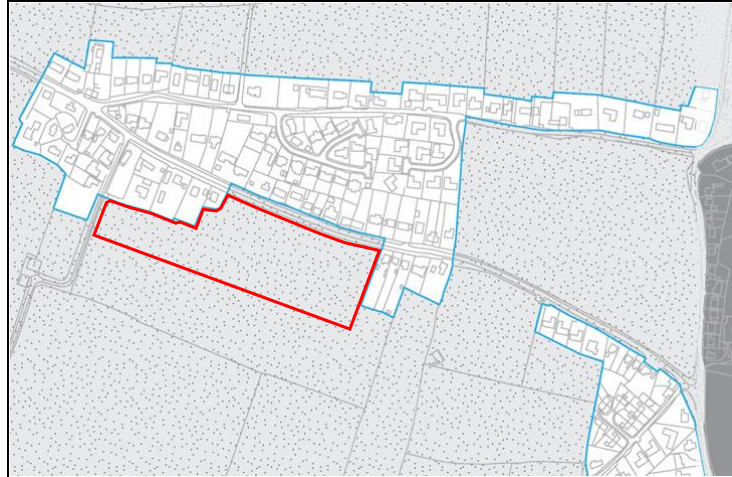


Photograph 2



Photograph 3

- 2.1.5 Under the provisions of the current Pembrokeshire Local Development Plan, the site (edged in red) adjoins the Development Limits (edged in blue) for the settlement of Hill Mountain, as illustrated in the plan below.



Plan B

- 2.1.6 As can be seen, the Alternative Site has a close association in the immediate sense with the existing form of the settlement to its north, east and west. As a result of this, the Site therefore represents a logical opportunity for the expansion of the settlement at this location.

2.2 THE ADJOINING SETTLEMENT

- 2.2.1 As detailed above, the Alternative Site adjoins the existing settlement and form of Hill Mountain. As a result, the Site is within walking distance of the community facilities it includes, as well as a number of bus stops that are regularly served by the 308 service.
- 2.2.2 The settlement of Hill Mountain is also centrally positioned within a cluster of other settlements, including Sardis, Houghton and Llangwm, with the latter providing further essential community facilities and local services.

2.2.3 The above sustainable location and its proximity to the larger settlements of Neyland, Johnston, Haverfordwest and Pembroke Dock, should therefore be given full consideration when considering potential future growth options.

3.0 THE PROPOSAL

3.1 DEVELOPMENT OVERVIEW

- 3.1.1 It is proposed that the Alternative Site be allocated in the forthcoming replacement LDP for the purposes of 47 residential units. The illustrative layout (reproduced below) that accompanies this submission demonstrates that the Site is capable of accommodating this number in a deliverable and sustainable manner, taking into account its setting, topography and boundary features.



Plan C

- 3.1.2 As illustrated above, the Site is capable of accommodating a mix of unit sizes, but taking into account the existing form of development adjoining and surrounding the Site, it is suggested that a mix of single and two storey dwellings would be the most appropriate form of units at this location. The associated density – 47 units – has therefore taken into consideration these design parameters.
- 3.1.3 With regards then to access, it is proposed that the Alternative Site would gain access directly off the public highway running along the northern edge of the Site, both in terms of any new estate road or private individual drives. The point of access onto the public highway for the proposed estate road has been chosen by taking into account the Site's existing topography and the level of visibility afforded by this

section of the public highway. It is envisaged that a new footway would be constructed along the entire length of the Site's frontage with the public highway.

3.1.4 Provision within the site layout has also been made to ensure its development would be in line with other regulatory requirements. As a result, provision has been made for on-site SUDS features, as well as a significant level and mix of biodiversity enhancement features.

3.1.5 Although the settlement includes provision for some leisure amenity space, it is envisaged that the proposed development of the Site would include some on-site play or general amenity space for use by both existing and proposed residents of the settlement.

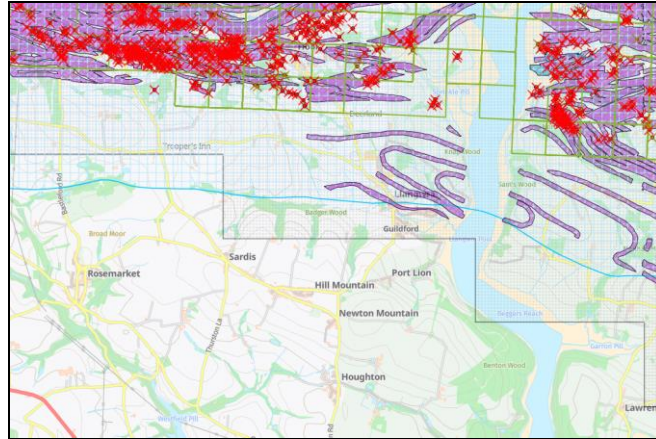
3.2 INFRASTRUCTURE AND GROUND CONDITION CONSIDERATIONS

3.2.1 Any development of the Alternative Site for residential units would be served by mains water and electricity, connections to which lie within the adjoining stretch of public highway. We understand then that foul water would be dealt with by means of a connection to the public sewer system.

3.2.2 With regards to surface water, neither the Alternative Site nor adjoining land show evidence of poor drainage conditions (e.g. water settlement etc.). As a result, it is considered that there would be no obstruction to any development of the site in terms of the disposal of surface water.

3.2.3 Due to its historic use (crop growing and grazing), the Site has no historic use that could lead to possible contamination constraints to its future development.

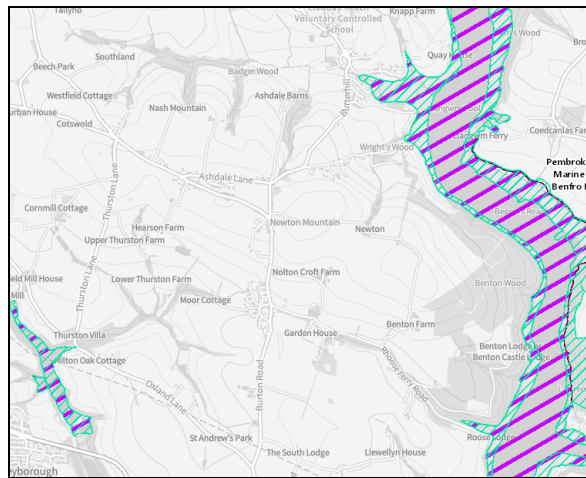
3.2.4 With regards to ground conditions, as can be seen from Plan E below, the Site lies outside of the Development High Risk Area and does not include any features associated with the wider area's historic mining past. As a result, there are no ground condition related obstacles to the Site's future development.



Plan D

3.3 BIODIVERSITY CONSIDERATIONS

3.3.1 The Alternative Site is not allocated nor does it adjoin any area allocated for the purposes of nature conservation on either a local or national level, as can be seen from the nearest designations illustrated on Plan F below.



Plan E

3.3.2 Furthermore, due to the current form of the Alternative Site – improved grassland – its development would also not result in a net biodiversity loss. Notwithstanding this and as detailed above, any development of the site would include provision to

enhance its current level of biodiversity. As a result, there are no ecological constraints to the delivery of the site for the purposes of residential development.

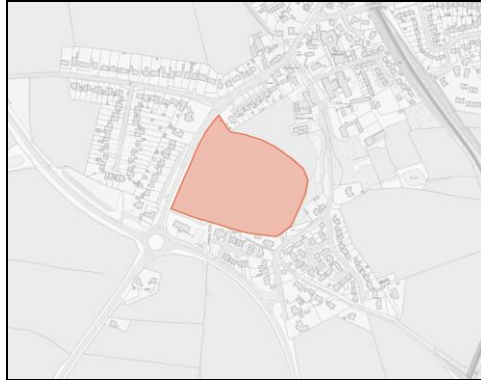


Photograph 4

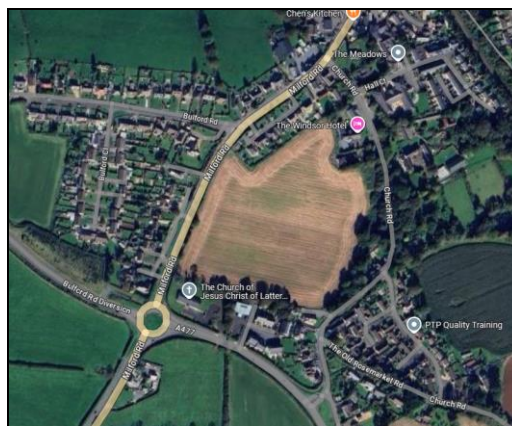
- 4.1.4 Under the provisions of the Deposit 2 LDP2, the site is allocated for the purposes of 101 residential units, expected to be delivered during the MT/LT delivery trajectory period. It should also be noted that the site is allocated for the same number of units in the current LDP, adopted in February 2013. Despite being allocated for over 10 years, the site has yet to see a single unit constructed upon it.
- 4.1.5 In addition to the above, we note from the Council's online records that the Site does not benefit from any planning history and so does not currently benefit from any extant planning permission for residential development. It is also not clear from the Council's records as to whether or not the site has been the subject of a recent pre-application enquiry submission.
- 4.1.6 In view of the above, there are serious questions and significant doubt over the delivery of the proposed 101 units on the allocation in question during the proposed Plan period, particularly as no indication or action has been taken to see any progress towards its development during the current Plan period. This is perhaps unsurprising as historically Pembrokeshire as a County has struggled to deliver sites of a scale greater than 50+ units (individually or as part of a larger allocation). As a result, the inclusion of this proposed allocation puts the soundness of the Plan into serious question and its continued allocation for residential purposes should not be supported.

Land North of Hayston View, Johnston (LDP2 Ref. No. HSG/048/00038)

- 4.1.7 The land in question (shaded in red in the Deposit 2 Proposals Map extract below) is largely level and undeveloped, as illustrated in Photograph 5.



Plan G



Photograph 5

- 4.1.8 Under the provisions of the Deposit 2 LDP2, the site is allocated for the purposes of 50 residential units, expected to be delivered during the MT/LT delivery trajectory period. It should also be noted that the site and remainder of the agricultural enclosure it forms part of are allocated for 130 residential units, in the current LDP, adopted in February 2013. Despite being allocated for over 10 years, the site has yet to see a single unit constructed upon it.

4.1.9 With regards then to planning history, the site has been the subject of two previous planning applications for residential development. One submitted in 2008 (LPA ref. No. 08/0472/PA) was withdrawn and a further submitted in 2009 (LPA Ref. No. 09/0455/PA) was refused. No planning applications have since been submitted for consideration and so according to the Council's online records, the site does not benefit from any extant planning permission for residential development.

4.1.10 Again therefore and in view of the above, there are serious questions and significant doubt over the delivery of the proposed 50-100 units on the allocation in question during the proposed Plan period and beyond, particularly as no indication or action has been taken to see any progress towards its development during the current Plan period. As a result, the inclusion of this proposed allocation puts the soundness of the Plan into serious question and its continued allocation for residential purposes should not be supported.

Summary

4.1.11 It is clear that the proposed LDP2 is continuing to place reliance on large scale housing allocations for the provision of much needed new housing for the communities positioned between the two large conurbations of Haverfordwest and Pembroke Dock. However, as history has shown, such large (100+ units) allocations are simply undeliverable in the market and context in question, which has then led to the significant historic under provision of new homes in this area of Pembrokeshire and in turn a reduction in population due to an inability to retain families within the area.

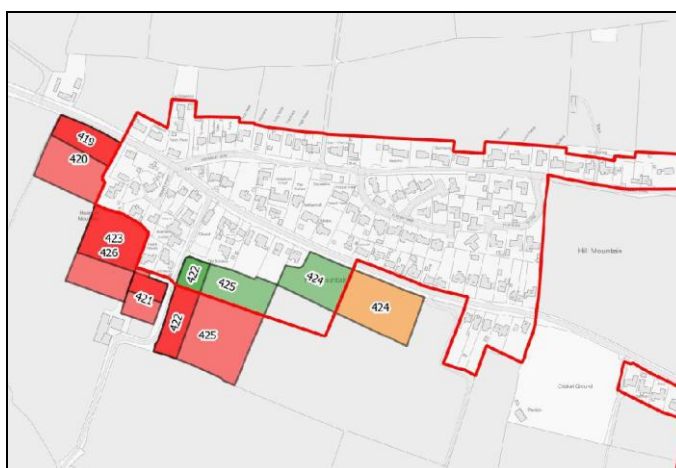
4.1.12 Based on the evidence above, if the current Plan is to avoid failure in the manner that the current Plan has experienced, the two allocations referred to above need to be removed and deliverable alternatives such as the Alternative Site subject of this Report introduced in their place, to ensure that the emerging Plan passes all Tests of Soundness.

5.0 CONSIDERATION OF SITE BY LPA TO DATE

- 5.1 Much of the Site subject of this Report was promoted at the Alternative Site stage as edged red on Plan A of this Report.
- 5.2 We understand that all Candidate Sites have undergone an assessment by the LPA as part of the preceding LDP preparation process. However, the only available information on the Candidate Site subject of this report was as presented in the following table and plan from the respective document.

424	Adjacent to Brackenhurst / Cyfagos at Brackenhurst	Hill Mountain	Agriculture / Amaethyddiaeth	Housing / Tai	Amber 2	0.59	Passed all phases	Part allocated	Amber 4
424	Adjacent to Brackenhurst / Cyfagos at Brackenhurst	Hill Mountain	Agriculture / Amaethyddiaeth	Housing / Tai	Amber 2	0.39	Part passed all phases, part phase 4	Part allocated	Green 4

Figure 1



Plan H

- 5.3 As can be seen, following its assessment, the Council have determined to allocate an element of the site (Green 4 above) in the Deposit 2 for residential development. The remainder has then been omitted from the allocation (Amber 4) on the following basis:

“Residential proposal not required at this stage – A site which is not constrained but is surplus to requirement, as a suitable level of housing growth could be achieved using an alternative site deemed better related to the build form of the settlement.”.

- 5.4 For the reasons set out in Section 4 of this Statement, it is clear that the anticipated level of ‘housing growth’ in the area in question will not be achieved by currently proposed housing allocations. As a result and on the basis that the development of the Alternative Site is ‘not constrained’ by any factor or interest, its wholesale allocation would then in turn ensure that the emerging LDP adheres to all of the Tests of Soundness.

6.0 SUSTAINABILITY APPRAISAL OF ALTERNATIVE SITE

- 6.1.1 We understand that the majority of the Alternative Site was subject to the Sustainability Appraisal process as set out by the LPA. Based on the detailed highlighted in Section 5 of this Statement, it is therefore clear that the Alternative Site represents a sustainable option for further development.

7.0 COMPATIBILITY OF PROPOSAL WITH LDP STRATEGY AND SOUNDNESS OF PLAN

7.1 THE LDP STRATEGY

7.1.1 As detailed above, Chapter 3 of the Deposit 2 LDP provides an indication of the document's Strategy. In terms of the distribution of growth, this is to be based on a Settlement Hierarchy, based on the following scale:

1. Main Town
2. Rural Town
3. Service Centre
4. Service Village
5. Cluster Local Village
6. Local Village

7.1.2 As outlined previously in this report, the distribution of growth is to be proportionate to the role and position of the respective settlement in the above hierarchy. On this subject, Paragraph 3.10 states that *"The greatest levels of growth (housing sites of 5 or more) are located in settlements which are at a Service Village level or higher within the Settlement Hierarchy."*

7.1.3 With regards then to the split of the majority of growth, the Plan highlights that a 60%/40% split has been chosen in terms of urban/rural areas. This is explained further at Paragraph 3.14, which states *"A 60%/40% split is also more likely to be deliverable than 70%/30% split. This is because it directs growth to a greater range of small and medium sized sites, instead of focusing growth on a small number of large sites in urban areas."* It goes on then to state that *"Previous experience of LDP1, suggests that these sites are more easily delivered, in particular by smaller independent builders."*

7.1.4 In summary therefore, the allocation of the Alternative Site in question for the purposes of residential development would accord with the LDP Strategy and the LDP would be sound if the site were to be included in the final Plan.

7.2 SOUNDNESS OF PLAN

- 7.2.1 Further to the above, the LPA have included a Guidance Note as part of their Deposit 2 LDP Representation Form 3 tests with which to assess the soundness of the Plan, with or without any changes proposed.
- 7.2.2 Taking into consideration the above and the evidence found within this Report, it is clear that the deliverability and sustainability level of the Alternative Site and its proposed use does not conflict with any of the Tests' requirements. In fact, through its allocation, it will help to address the failure of proposed allocations to meet the requirements of Tests 2 and 3, as the two proposed allocations for the wider area that Hill Mountain forms part of will be – yet again - unable to deliver their anticipated level of new housing units.
- 7.2.3 In summary therefore, the Alternative Site meets all the Tests set out by the LPA and so its inclusion as part of the LDP would ensure the soundness of the Plan.

8.0 SUMMARY AND CONCLUSION

8.1 SUMMARY

- 8.1.1 The overarching national planning policy document for Wales is Planning Policy Wales (Edition 12). In terms of all aspects of Development Plans, PPW sets out at Paragraph 1.22 that they must “... *provide **certainty** for developers and the public about the type of development that will be permitted at a particular location.*”. Paragraph 1.26 then goes on to provide more specific guidance in relation to Local Development Plans, setting out that they should “... *set out a vision for how places are expected to change in land use terms to accommodate development needs over the plan period. This provides **certainty** for developers and the public about the type of development that will be permitted at a particular location.*”.
- 8.1.2 Planning Policy Wales (supported by the Local Development Plan Manual) identifies the process of establishing a level of housing provision a development plan should make during its lifetime. A key component of achieving the identified level of growth, is ensuring that any sites allocated for housing development are ‘deliverable’, with paragraph 4.2.11 defining a deliverable sites being “... *free, or readily freed, from planning, physical and ownership constraints and be economically viable at the point in the trajectory when they are due to come forward for development, in order to support the creation of sustainable communities.*”.
- 8.1.3 The evidence presented as part of this report and as part of objections submitted in relation to other housing allocations proposed by the Deposit 2 LDP for the wider area has shown that these currently proposed allocations are not meeting this underlying requirement in the preparation of an LDP. In particular, the decision to continue to rely on historic allocations that have yet to provide a single unit for in excess of 15 years is unacceptable and results in the core strategy of the LDP being undermined.
- 8.1.4 In contrast to the current approach adopted by the Authority, the Alternative Site in question forms a logical, sustainable and deliverable extension to an existing part of the settlement. Furthermore, as identified by the Authority in its own assessment process, the Site’s development is capable of being delivered without any detriment to any known ecological,

drainage, highway safety, ground condition or other interest and there are no obstacles to its delivery.

- 8.1.5 The information in this Statement has not only demonstrated that the Site is deliverable, but, it has been demonstrated that unlike other proposed allocations in the emerging LDP, the allocation of the Alternative Site will accord with the LDP strategy and will ensure that through its allocation that the final version of the Plan would be sound in relation to this aspect.

8.2 CONCLUSION

- 8.2.1 In view of the above and information provided in this report, it is respectfully requested that the Alternative Site in question be allocated for residential development.



1 Site Location
1 : 2500

9 Pine Tree close
Burry port
Carmarthenshire
SA16 0TF

TEL 01554833725
07837594671



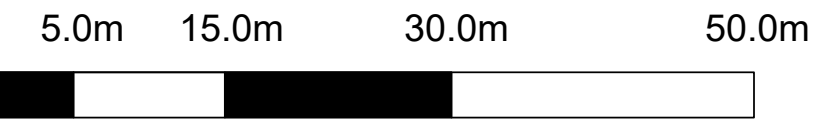
				PROJECT		CLIENT		
				Land at Hill Mountain, Pembrokeshire		Date	Project number	Scale (@ A3)
				Site Location Plan		05/12/2024	Project Number	1 : 2500
CODE	STATUS	SUITABILITY DESCRIPTION	PURPOSE OF ISSUE			Author	DRAWING NUMBER	
			Planning			Checked by	A101	
								REV



key

	Detached house 4 bed		5.5m wide Road
	Pair of semi detached 2 bed		2.0m wide Pavement
	Pair of semi detached 3 bed		Suds feature
	Detached Bungalow 4 bed		Biodiversity Enhancement Area
	Detached Bungalow 3 bed		Play amenity area
	Parking spaces 2.6m x 4.8m		Additional hedge planting

1 Site Layout Plan
1 : 500



Land at Hill Mountain, Pembrokeshire

Date	05/12/2024	Issue Date	
Drawn by		Author	
Checked by		Checker	
A102			
Scale	1 : 500		