

Emma Evans

From: [REDACTED]
Sent: 12 December 2024 07:07
To: LDP - For Enquiries
Cc: Andrew Vaughan-Harries; Dan Voaden; Sarah Voaden
Subject: LDP REVIEW / REPLACEMENT LDP (LDP2) 2021-2033 - LPD2 OBJECTION - Under Draft Policy SP7 Settlement Boundaries
Attachments: Voaden Narbeth Objection PCC LDP2 Dec 2024 FINAL.pdf; Voaden Narberth Deposit Plan 2 Comments Form.pdf; Appendix A.pdf

Importance: High

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

**LPD2 OBJECTION – Under Draft Policy SP7 Settlement Boundaries
LOCAL DEVELOPMENT PLAN (LDP) REVIEW / REPLACEMENT LDP (LDP2) 2021-2033
(21 October -16 December 2024) Consultation on the Deposit Plan**

HAYSTON DEVELOPMENTS & PLANNING LTD is submitting an objecting in respect to the Local Development Plan (LDP) Review / Replacement LDP (LDP2) 2021-2033 on behalf of Dan Voaden and Sarah Voaden.

Please find attached an Objection Letter, with Appendix A, and completed Representations Form.

Please can you confirm receipt of this objection.

Regards

[REDACTED]



Hoffem gael eich barn am y Cynllun Datblygu Lleol ac ar ddogfennau sy'n cefnogi'r Cynllun Datblygu Lleol. Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. sylwadau neu wrthwynebiadau) Mae fersiynau nodiadau cyfarwyddyd ar gael o <https://www.sir-benfro.gov.uk/adolygur-cynllun-datblygu-lleol/adneuo>.

Sylwch: **Ni fydd** sylwadau a wneud ar Gynllun Adneuo 2020 yn cael eu symud ymlaen ac mae angen gwneud sylwadau newydd ar y Cynllun Adneuo presennol hwn.

Os ydych yn cyflwyno copi papur, atodwch dudalennauychwanegol lle bod angen. Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Yr Arolygiaeth Gynllunio.

Mae'n rhaid derbyn eich sylwadau erbyn hanner nos Rhagfyr 16eg 2024. Dychwelwch ffurflenni at: ldp@pembrokeshire.gov.uk neu
Y Tîm Cynlluniau Datblygu, Neuadd y Sir,
Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

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

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

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

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

RHAN A: Manylion cysylltu

PART A: Contact details

Eich manylion/manylion eich cleient
Your / your client's details

Manylion yr asiant (os ydynt yn berthnasol)
Agent's details (if relevant)

Enw Name	Dan & Sarah Voaden	Andrew Vaughan - Harries
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		Hayston Developments and Planning Ltd
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)		
Dyddiad		



Date		
RHAN B: Eich sylw		
PART B: Your representation		
Eich enw / sefydliad Your name / organisation	Hayston Developments and Planning Ltd Andrew Vaughan-Harries (Director)	
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)	N/A	
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	N/A	
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	Proposal Map for Narberth (66)	
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.	N/A	
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.	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.

Dyraniad safle newydd

New site allocation

N/A

Polisi newydd

New policy

N/A

Paragraff neu destun ategol newydd

New paragraph or supporting text

N/A

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

Reinstatement of Settlement Limits only in the main rural town of Narberth

Cyfeiriad y cais

Site reference

See attached report and map extract

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 Objection Letter and Appendix A

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.

Yes

Rwyf am siarad mewn sesiwn gwrandawriad.

I want to speak at a public hearing.

No

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

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing



site at Pen y Graig' or 'The overall housing target').

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

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

Rwy'n dymuno cael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

N/A

Rwy'n dymuno cael fy nghlywed yn Saesneg.

I wish to be heard in English.

N/A



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.

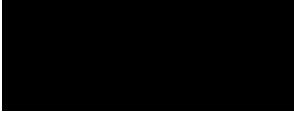


Refusal of Planning Permission

Town and Country Planning Act 1990

Name and address of Applicant

Sarah Voaden



Name and address of Agent (if any)

Mr Kevin Davies,



Part I - Particulars of application

Date of application:

19-Jun-2024

Application Number:

24/0316/PA

Particulars and location of development:

Erection of 3 dwellings - Llwynon, 61, St James Street, Narberth, Pembrokeshire, SA67 7DB

Part II - Particulars of decision

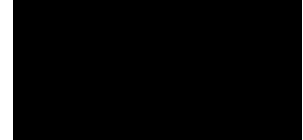
The Pembrokeshire County Council hereby give notice in pursuance of the provisions of the **Town and Country Planning Act 1990** that **permission has been refused** for the carrying out of the development referred to in Part I hereof in accordance with the application and plans submitted subject to the following reasons:

1. The application proposes to discharge surface water to a watercourse located 50 metres to the south of the application site which would require drainage pipework to cross third party land. As such the application fails to demonstrate that the necessary and appropriate service infrastructure for the proposed development can be achieved and the proposal is contrary to criterion 6 of policy GN.1 (General Development Policy) of the Local Development Plan for Pembrokeshire (adopted 28 February 2024)
2. Policy GN.28 (Local Needs Affordable Housing) and adopted Supplementary Planning Guidance (Affordable Housing) require affordable housing provision on all new housing developments. In this case, a commuted sum is required and no original signed Unilateral Undertaking and Certificate of Title has been provided to secure this payment. As such, the proposal is contrary to Policy GN.28 of the Local Development Plan for Pembrokeshire (adopted 28th February 2013), Affordable Housing Supplementary Planning Guidance and Future Wales, The National Plan 2040, February 2021.

3. There is a risk that the proposed development will lead to an adverse impact on the integrity of the Afon Cleddau Special Area of Conservation, contrary to the provisions of Policy SP 1 Sustainable Development, GN.1 General Development Policy and GN.37 Protection and Enhancement of Biodiversity of the adopted Pembrokeshire Local Development Plan (2013).

Date: **13-Aug-2024**

**County Hall
Haverfordwest
Pembrokeshire**



Head of Planning

Notes to Applicant

1. This decision relates only to the plans identified below:
 - Drawing No. 2842-RDJWL-XX-XX-DR-A-0015 Rev C02 Location Plan
 - Drawing No. 2842-RDJWL-XX-XX-DR-A-0016 Rev C01 Existing and Propsoed Block Plans
 - Drawing No. 2 Topographical Survey
 - Drawing No. 2842-RDJWL-ZZ-ZZ-DR-A-0021 Proposed Site & Ground Floor Plan
 - Drawing No. 2842-RDJWL-XX-XX-DR-A-0022 Fire Strtategy Plan
 - Drawing No. 2842-RDJWL-XX-XX-DR-A-0023 Construction Management Plan
 - Drawing No. 2842-RDJWL-01-ZZ-DR-A-0025 Rev C02 Plots 1 & 2 Proposed Floor Plans and Elevations
 - Drawing No. 2842-RDJWL-03-ZZ-DR-A-0026 Rev C02 Plot 3 Proposed Floor Plans and Elevations
 - Drawing No. RDJWL-ZZ-ZZ-DR-A-0035 Propsoed Street Scene & Site Section

Notes

1. If you are in receipt of a householder or minor commercial decision and are aggrieved by the decision of the local planning authority to refuse permission, or to grant permission or approval subject to condition, then you can appeal to the Welsh Ministers under Section 78 of the Town and Country Planning Act 1990 within 12 weeks of the date of the notice of the decision or determination giving rise to the appeal.

If you are in receipt of any other decision notice and are aggrieved by the decision of the local planning authority to refuse permission or, or to grant permission or approval subject to condition, then you can appeal to the Welsh Ministers under Section 78 of the Town and Country Planning Act 1990 within 6 months of the date of the notice of the decision or determination giving rise to the appeal. The Welsh Government has power to allow a longer period for the giving of a notice of appeal but it will not normally be prepared to exercise this power unless there are special circumstances which exclude the delay in giving notice of appeal. The Welsh Government is not required to entertain an appeal if it seems to it that permission for the proposed development could not have been granted by the local planning authority, or could not have been so granted otherwise than subject to the conditions imposed by them, having regard to the statutory requirements to the provisions of any development order, and to any directions given under the order. In practice, the Welsh Government does not refuse to consider appeals solely because the local planning authority based its decision on a direction given by the Welsh Government.

2. How can you submit your appeal?

You can download the appeal forms online through the planning portal website at; www.planningportal.gov.uk/wales/public. Once you have downloaded the appeal forms you can complete them electronically and email them to us at PEDW.Casework@gov.wales.

You can also either print off the downloaded appeal forms or get a copy of the forms by contacting us on 0303 444 5940 and complete them by hand. They need to be sent into the address below:

PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

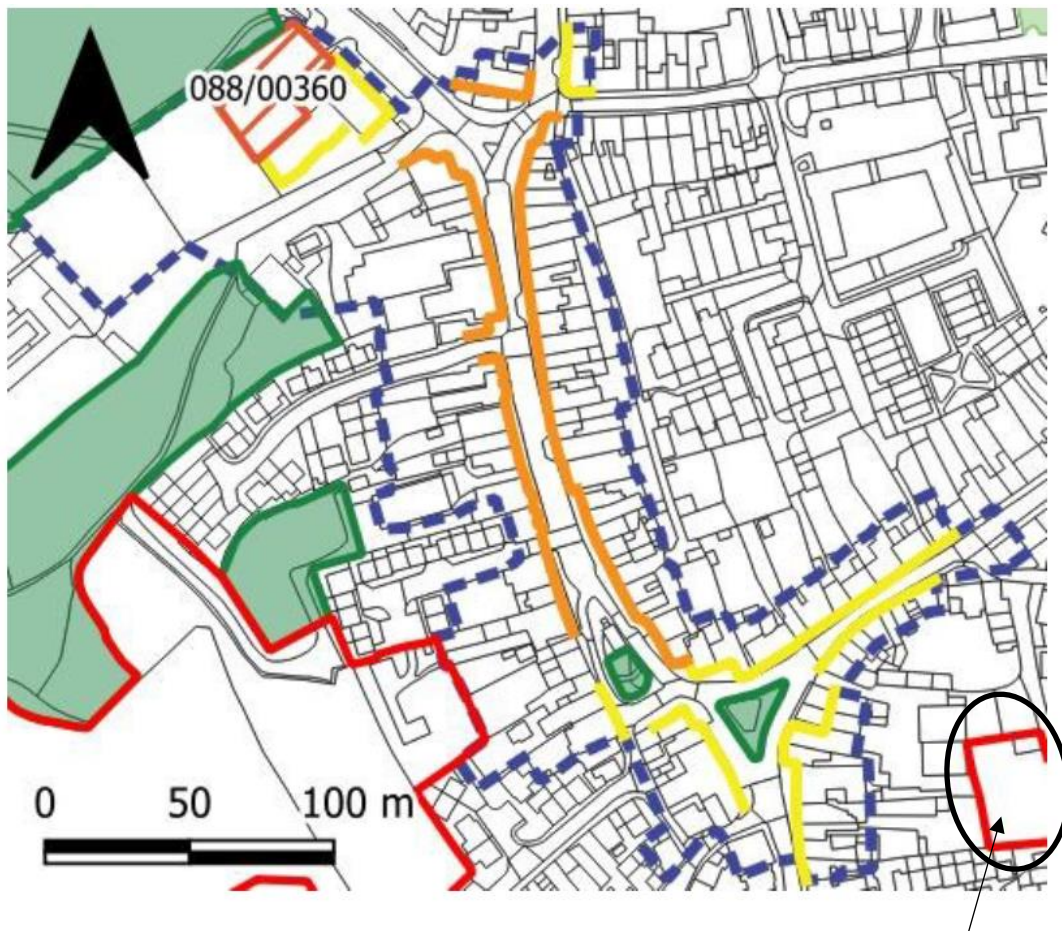
3. If permission to develop land is refused or granted subject to conditions, whether by the local planning authority or by the Welsh Government, and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted, he may serve on the Council of the county district in which the land is situated a purchase notice requiring that council to purchase his interest in the land in accordance with the provisions of part VI of the Town and Country Planning Act 1990.
4. In certain circumstances, a claim may be made against the local planning authority for compensation, where permission is refused or granted subject to conditions by the Welsh Government on appeal or on a reference of the application to them. The circumstances in which such compensation is payable are set out in section 114 of the Town and Country Planning Act 1990.

LOCAL DEVELOPMENT PLAN (LDP) REVIEW / REPLACEMENT LDP (LDP2) 2021-2033

(21 October -16 December 2024)
Consultation on the Deposit Plan

Objection

12th December 2024

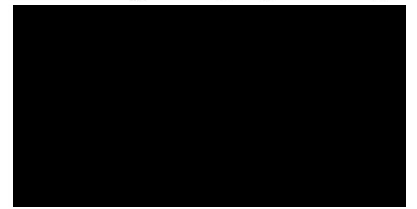


**Site / Area excluded in LDP2
Deposit Plan**

Narberth (centre) / Arberth (canol)

Scan of the Proposal Map for Narberth within Deposit LDP2

The Planning Studio, Hayston Bridge



The Development Plans Team
Pembrokeshire County Council
County Hall
Haverfordwest
Pembrokeshire
SA61 1TP

LPD2 OBJECTION – Under Draft Policy SP7 Settlement Boundaries

HAYSTON DEVELOPMENTS & PLANNING LTD is submitting an objection in respect to the Local Development Plan (LDP) Review / Replacement LDP (LDP2) 2021-2033 on behalf of Dan Voaden and Sarah Voaden.

This objection relates to the proposed redrafting of the settlement boundary for Narberth to **exclude** land to the rear of Llwynon, 61 St James Street, Narberth – part of which lies within the garden area / curtilage of the property.



Aerial Photograph of garden / paddock and car park excluded from the Narberth settlement limits in LDP2

The Local Development Plan, which was adopted in February 2013, shows the settlement limit for Narberth enclosing an area of land to the rear of 61 St James Street, the home of the objectors, as illustrated on the next page. There appears no reason why PCC has decided to delete this paddock / garden and parking area from within the currently adopted settlement boundary. Whilst this site lies within a Conservation Area and has some trees on its boundary, these should not be reasons to re-draw the boundary line at this point. In reviewing LDP2

background papers from the Council, no justification for this can be found and so this decision does not appear transparent and illogical.



Inset Map for Narberth February 2013 (site is within the red line of the settlement limits)

The site is described in a recent planning officer report as follows:

“The application site is a mainly sloping, undeveloped parcel of land located to the south of St James Street in Narberth and within the Conservation Area. The northern part is used as garden to 61 St James Street, a Grade II listed building. It is accessed from a lane leading from Tabernacle Lane and is surrounded by residential development”. (Source – para 3.1 of the Planning Officer’s report on application 24/0316/PA)

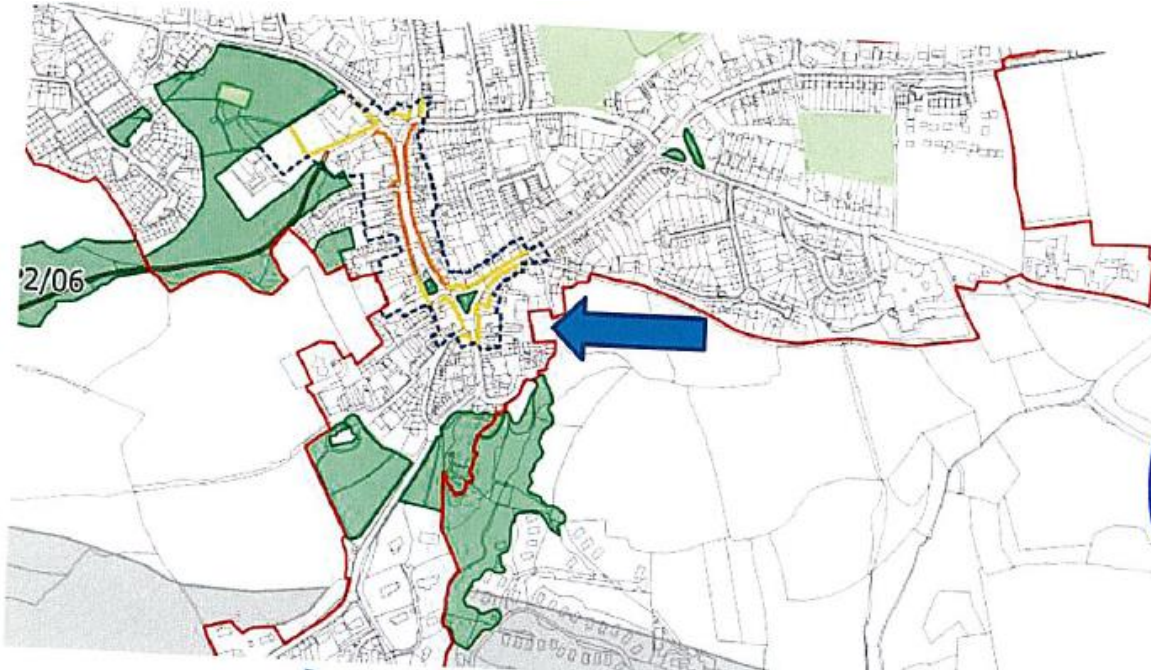
This site can be clearly regarded as a windfall site that would be particularly suitable for new residential development or business / tourism use as it lies close to the town centre of Narberth, has car access, is not prominent in the public realm and is easily connected to services.



Private access to application site and a car parking area (supported by PCC Highways for three dwellings)

Narberth is classified as a Rural Town under policy SP12 of the adopted LDP, reflecting its wide range of facilities and services including a frequent bus route from Tenby to Haverfordwest, the presence of a railway station, a junior school and a health centre as well as a variety of shops and cafes.

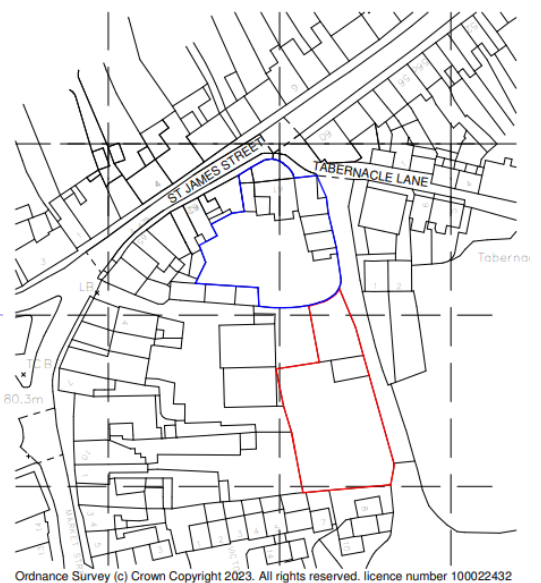
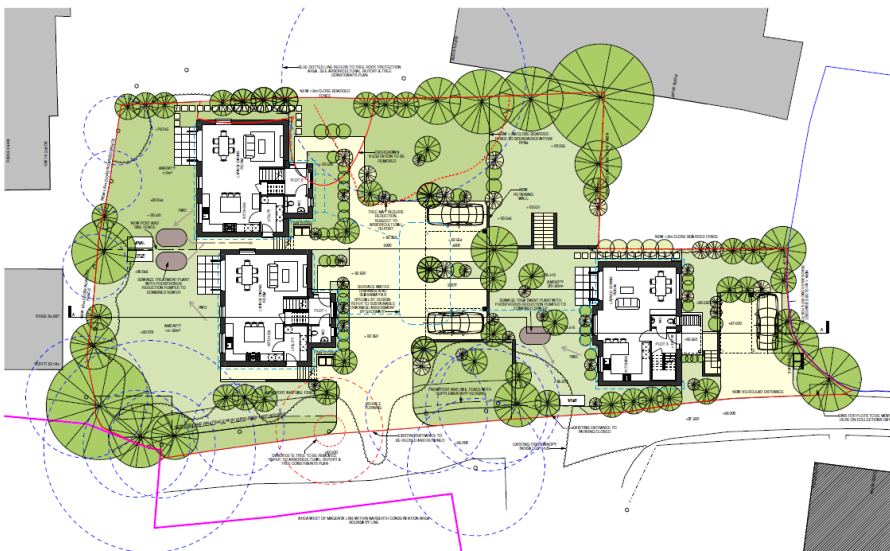
The Deposit Plan Draft of LDP2 dated January 2020 showed the settlement boundary again excluding this area of land to the rear of Llwynon as shown below. Similarly, the more recent Deposit Plan 2 of September 2024 which, on adoption, will be the Replacement LDP, also excludes the same area of land. No reason can be found as to why this approach has been taken.



Proposed Inset Map for Narberth – 1st deposit Plan (this was superseded) by Version 2

Recent Planning Applications

A site plan, as shown below, which accompanies the application submitted by the owner of land to the rear of Llwynon, proposes the construction of 3 detached residential properties.



***Location and Site plan of
planning application
24/0756/PA***

Firstly, Planning application 24/0316/PA was submitted for the erection of three dwellings with amenity space, car parking, landscaping and ancillary works was refused on 19th June 2024 with the three reasons being:-

- *The application proposes to discharge surface water to a watercourse located 50 metres to the south of the application site which would require drainage pipework to cross third party land. As such the application fails to demonstrate that the necessary and appropriate service infrastructure for the proposed development can be achieved and the proposal is contrary to criterion 6 of policy GN1.*
- *Policy GN28 and adopted SPG (Affordable Housing) require affordable housing provision on all new housing developments. In this case a commuted sum is required and no original signed Unilateral Undertaking and Certificate of Title has been provided to secure this payment*
- *There is a risk that the proposed development would lead to an adverse impact on the integrity of the Afon Cleddau Special Area of Conservation, contrary to the provision of policy SP1 Sustainable Development, policy GN1 and policy GN37*

A copy of the decision notice is attached as **Appendix A**.



View of application sites for both 24/0316/PA & 24/0756/PA

Whilst a number of private objections were received to the proposal, the Highway Authority concluded, in its assessment of the proposal, that:-

The application has been considered by the COUNTY HIGHWAY AUTHORITY who having assessed the application on safety, capacity and policy grounds recommends the following conditions be imposed on any permission granted: - these are conditions that can be achieved within the parameters of the site and its immediate location. (The nature of the proposed access was not among reasons for refusal).

Therefore, the access and links to the town were deemed acceptable. Also impact on the conservation Area and existing trees / ecology were deemed acceptable.

Resubmission of Three Dwellings (24/0756/PA) – Current Application

On 6th November 2024 the applicant and land owner re-submitted an application for the erection of three dwellings to the rear of Llwynon - reference 24/0756/PA – an application which is to be determined.

This resubmission has taken into account the three reasons for the refusal of application 24/0316/PA and, as a result, this revised proposal incorporates:-

- A revised SUDS assessment by GeoSmart which proposes surface water discharge into a shared soakaway located within the curtilage of the site, beneath the car park area.
- The proposed provision of a signed, original Universal Undertaking and Certificate of Title which will follow the submission of this revised proposal
- Each property will be equipped with a sewage treatment plant, with phosphorus reduction, which will pump treated water into the combined sewer which serves this part of Narberth

In addition the application is accompanied by the following Reports:-

- Planning and Conservation Statement
- Arboricultural Report
- Construction Traffic Management Plan
- Ecology and Biodiversity Report
- Sustainable Drainage Systems (SuDS) Assessment.

Early consultee replies show that Welsh Water, CADW and PCC Highways are again happy and raise no objection and conditional approval.

It is anticipated that this re-submission with its additional information will allow the Planning Authority to consider allowing the construction of the three dwellings to the rear of Llwynon, as described the Drawings forming part of 24/0756/PA – with the LPA noting that the land concerned currently lies within the current settlement limit for Narberth.



***View of part of application site 24/0316/PA and
24/0756/PA (part of Garden)***



View of southern and eastern aspects of land to rear of Llwynon



View looking south from garden and it clearly feels part of the town and not the countryside

CONCLUSION

It is clear that in the grand scheme of the LDP2 and its re-consultation, that this objection is not really a significant one. However, as no real planning reason can be given for its deletion and exclusion we have to register that **the decision to exclude this paddock and garden brings “unsoundness” to this decision process.**

The first planning application 24/0316/PA for the construction of three detached residential properties located on land within the settlement limit of Narberth was refused for reasons relating to the failure to provide:-

- Acceptable arrangements for the discharge of surface water
- A signed Unilateral Undertaking and Certificate of Title re a commuted sum for affordable housing
- Acceptable arrangements for the discharge of foul water

Even if the housing was refused, the site would still offer alternative uses as business / tourism or uses related to adjoining users. So again, being within settlement limits this would bring a better presumption in favour of development and help users in a sustainable location like this in Narberth.

It is considered that the resubmitted application (now live) for three dwellings on this site (24/0756/PA) includes the required information in respect of surface and foul water drainage and the preparation of a Universal Undertaking and Certificate of Title. This re-submission is also accompanied by the additional information / Reports as listed above – para 3.3. As a result, it is suggested that the issue of a planning consent for three detached dwelling could be anticipated

It is therefore proposed that the site of application 24/0756/PA for three residential properties close to the centre of Narberth should be included within the settlement limit and not excluded as proposed in the Deposit Plan for LDP2. It is also clear that the reasons for the refusal of application 24/0316/PA have been met by the revised and submitted 24/0756/PA - thus allowing a form of housing to proceed on this site.

We look forward to your thoughts to this relatively simple change to reinstate this land into settlement limits could be agreed early on with the Inspector at the Public Inquiry / Hearing.

Yours Sincerely

REPORT PREPARED BY
MARTIN BELL (RETIRED)
SENIOR PLANNER

REPORT REVIEWED BY
ANDREW VAUGHAN-HARRIES BSC DIP TP MRTPI
DIRECTOR/PRINCIPAL PLANNER



RTPI

mediation of space · making of place

Appendix A