

Nettleship, Tom

From: Wayne Reynolds <wayne@atriarcgroup.com>
Sent: 13 December 2024 11:07
To: LDP - For Enquiries
Subject: re: Consultation response, LDP candidate site reference number 268
Attachments: Appendix B - 2020 Leven_Close_LDP2_REP.pdf; 11.12.24 Abbey Homes Ltd LDP 2 response.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 morning PCC LDP team

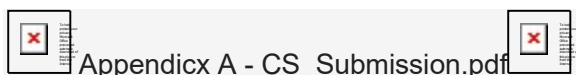
Following earlier correspondence, please find attached our response to the deposit LDP. I have attached three documents below, reference,

- 11.12.24 Abbey Homes Ltd LDP 2 response (attached below)
- Appendix A (google drive link due to size), and;
- Appendix B (attached below)

If there are any queries or issues downloading Appendix A (copy of initial candidate site submission), please do let me know.

I look forward to hearing from you.

Best wishes



Wayne Reynolds

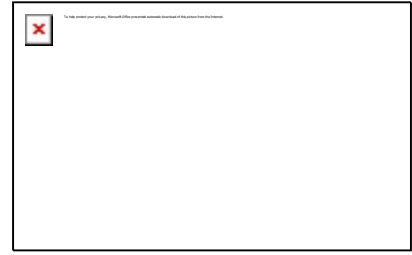
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Hoffem gael eich barn am y Cynllun Datblygu Lleol ac ar ddogfennau sy'n cefnogi'r Cynllun Datblygu Lleol. Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. sylwadau neu wrthwynebiadau) Mae fersiynau nodiadau cyfarwyddyd ar gael o <https://www.sir-benfro.gov.uk/adolygur-cynllun-datblygu-lleol/adneuo>.

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

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

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

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

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

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

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

RHAN A: Manylion cysylltu

PART A: Contact details

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

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

Enw Name	Abbey Homes Limited	Wayne Reynolds
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)	NA	Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	Abbey Homes Limited	Atriarc Planning
Cyfeiriad Address	12 Victoria Place, Haverfordwest, SA61 2LP	Llwyntreharne, Llangynin, St Clears, Carmarthenshire, SA33 4LA
Rhif ffôn Telephone no	NA	01994 220667/ 07855 646586
E-bost Email address	NA	wayne@atriarcgroup.com
Llofnodwyd (gallwch teipio) Signed (can be typed)	W. Reynolds	
Dyddiad	12.12.24	



Date		
RHAN B: Eich sylw		
PART B: Your representation		
Eich enw / sefydliad Your name / organisation	Atriarc Planning representation on behalf of, Abbey Homes Limited	
1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau? 1. Which part(s) of the Plan (or supporting documents) are you commenting on?		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	Candidate site reference number 268, Leven Close, Hook	
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	Applicable policies GN11, GN14 and GN15	
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	Hook LDP insert map page 50	
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.	*	
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

*

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

Abbey Homes Limited, Land adjacent to Leven Close, Hook,
Pembrokeshire, SA62 4LF

Cyfeiriad y cais
Site reference

Candidate site reference no. 268

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.

Atriarc Planning was engaged by Abbey Homes Limited to submit a Candidate Site (CS) in Hook for residential purposes (see attached plans). As the Inspector may not have reference to the original site submission, a copy of the original submission is provided in Appendix A (submitted at the outset of the call for candidate site process).

Following the initial review of the CS (LPA reference CS 268), the first deposit plan noted that an objection had been raised to the CS in respect of highway access. In March 2020 an LDP representation to the deposit plan was subsequently submitted to the LPA. A copy of the submission is included in Appendix B.

As noted in the Appended submission (see Appendix B), we represented our client at an LDP consultation meeting, held on the 26th February 2020. During this meeting we contested the highway officer's concerns, as highway access through our clients' existing development site was available - providing safe access and egress to the proposed CS. As noted in the prior submission, whilst the current road had been constructed to serve an under-construction development site, further lands remain under control of Abbey Homes Limited, whereby/ if needed, the width of the road could be extended either side of the road to further improve the road access. Upon clarification of the access route to the proposed CS with the Highway officer; it was noted that the current road serving the adjacent Leven Close site, could provide an appropriate vehicular access to the proposed CS. NB Options to alter or extend the width of the current road remain available (if ever required at future planning stages). The proposed CS therefore met the requirements of the LDP assessment process and was considered to fully comply with the deposit LDP policy requirements.

Following the most recent draft deposit (current) consultation, it was noted that a Highway objection remained on site. We enquired with the LPA to seek further information on the objection as, in our opinion, the matter had been resolved after previously clarifying the proposed road access route. As part of this current deposit consultation, we requested copies of the Highway officer's comments to review the continued objection to the CS. A copy of correspondence sent to and received from the LPA is provided overleaf. The following email extract identifies that a highway objection remains on site. However, no correspondence had been received by the LPA from the Highway department in respect of the prior consultation response submitted by Atriarc Planning. As such, the LPA has failed to correctly review all matters and evidence submitted as part of the CS and LDP consultation process. For this reason, there has been a clear failure in procedure to correctly assess the



evidence previously submitted.

Copy of LPA correspondence

----- Forwarded message -----

From: **LDP - For Enquiries** <ldp@pembrokeshire.gov.uk>

Date: Mon, 28 Oct 2024 at 12:18

Subject: RE: LDP consultation query site 268 - Hook

To: Wayne Reynolds <wayne@atriarcgroup.com>

Cc: LDP Team <ldpteam@pembrokeshire.gov.uk>

If you have received this email in error, please notify us and delete it from your computer immediately. Os ydych chi wedi derbyn yr e-bost hwn trwy gamgymeriad, byddwch cystal â rhoi gwybod inni a'i ddileu ar unwaith oddi ar eich cyfrifiadur.

Dear Wayne Reynolds,

Thank you for your message regarding this LDP 2 Candidate Site and the current LDP 2, Deposit Plan 2 public consultation.

The initial PCC highway response with regard to this Candidate Site was 'strongly object due to a significant constraint that cannot be mitigated'.

I understand that during the LDP 2, Deposit Plan 1 consultation in early 2020 there was an exchange of correspondence and further discussions regarding the highway matters relating to this site. Based on what is available to me, it seems that you clarified that the intention was that Leven Close would provide access to the site and that there was some debate relating to the site at an LDP drop-in session on the 26th February 2020, which Stephen Benger (PCC highways) attended.

As a follow-up to that, the then LDP-team planning officer dealing with the Hook area, Julie Kirk, asked Stephen Benger to formally clarify the position with regard to access to Candidate Site 268. However, I can find no evidence to indicate that her message ever received a response. Hence, we assume that the original objection from PCC highways still stands.

To provide a practical way forward, what I suggest you do is to object to LDP 2, Deposit Plan 2 during the current public consultation period, including confirmation of the intended access route to the site and information on the anticipated scale of further development you envisage it will serve. Once to hand, we can then seek further advice from our highway colleagues with regard to the capability of Leven Close to serve future development and also its current status with regard to adoption.

Kind regards,



Bob Smith

Prif Swyddog Cynllunio / Principal Planning Officer

Cyngor Sir Penfro / Pembrokeshire County Council

Neuadd y Sir / County Hall

Hwlfordd / Haverfordwest

SA61 1TP

Ffon / Tel: 01437-775364

E-bost / E-mail: bob.smith@pembrokeshire.gov.uk

www.pembrokeshire.gov.uk

From: Wayne Reynolds <wayne@atriarcgroup.com>

Sent: 26 October 2024 12:42

To: LDP - For Enquiries <ldp@pembrokeshire.gov.uk>

Subject: re: LDP consultation query site 268

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

Good afternoon PCC LDP Team

I hope the team is well. We are working for Abbey Homes Ltd in respect of Candidate Site reference 268 as part of the LDP review. We submitted the attached response to the initial consultation to clarify the highway's and planning officer's concerns about the site off Leven Close, following a meeting with the LPA at a consultation event held on the 26th February 2020. The highway items were resolved as ownership queries on access were clarified, but I note that the most recent consultation on the emerging LDP still notes a highway objection to the proposed allocation.

Would it be possible for you to send me the follow up Highway response to our consultation response in 2020, to review why the objection is still being noted on site? The site is a prime piece of land, adjacent to the settlement area, with straight forward options for biodiversity net gain on the adjoining lands (not proposed for development but could form part of a site proposal for offset planting enhancement as well as drainage/ SUDS etc...). The site has direct options to connect into



the existing sewer network so would be a great candidate site to take forward (and one that would be built out relatively quickly if allocated).

On receipt of the most recent highway officer's consultation response, we can review and provide an updated consultation response as part of the current consultation process.

I look forward to hearing from you.

Kind regards

Wayne Reynolds

BSc (Hons) MSc MA MRTPI

Director

Atriarc Planning & Construction

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...

As part of this current consultation we would note that some of the former residential units under construction (on the adjacent site) have since been sold. Since the earlier consultation response, plots 1, 7, 8, 9 10 and 11 have been completed. Plot 6 is yet to be developed (but has been sold to a third party). For the units that have been sold, we would also note that Abbey Homes Limited retains ownership of a buffer strip along the access road, measuring 1.8m from the current road edge, either side of the road, whereby, if ever required the existing road alignment could be amended/ increased. We have provided an updated plan to show the revised ownership of Abbey Homes Limited (fig 1), which continues to show that access to the proposed CS is available (or amendment if ever so required). The proposed access route through to the proposed CS is considered to be sound and therefore the current objection to the CS is without merit.

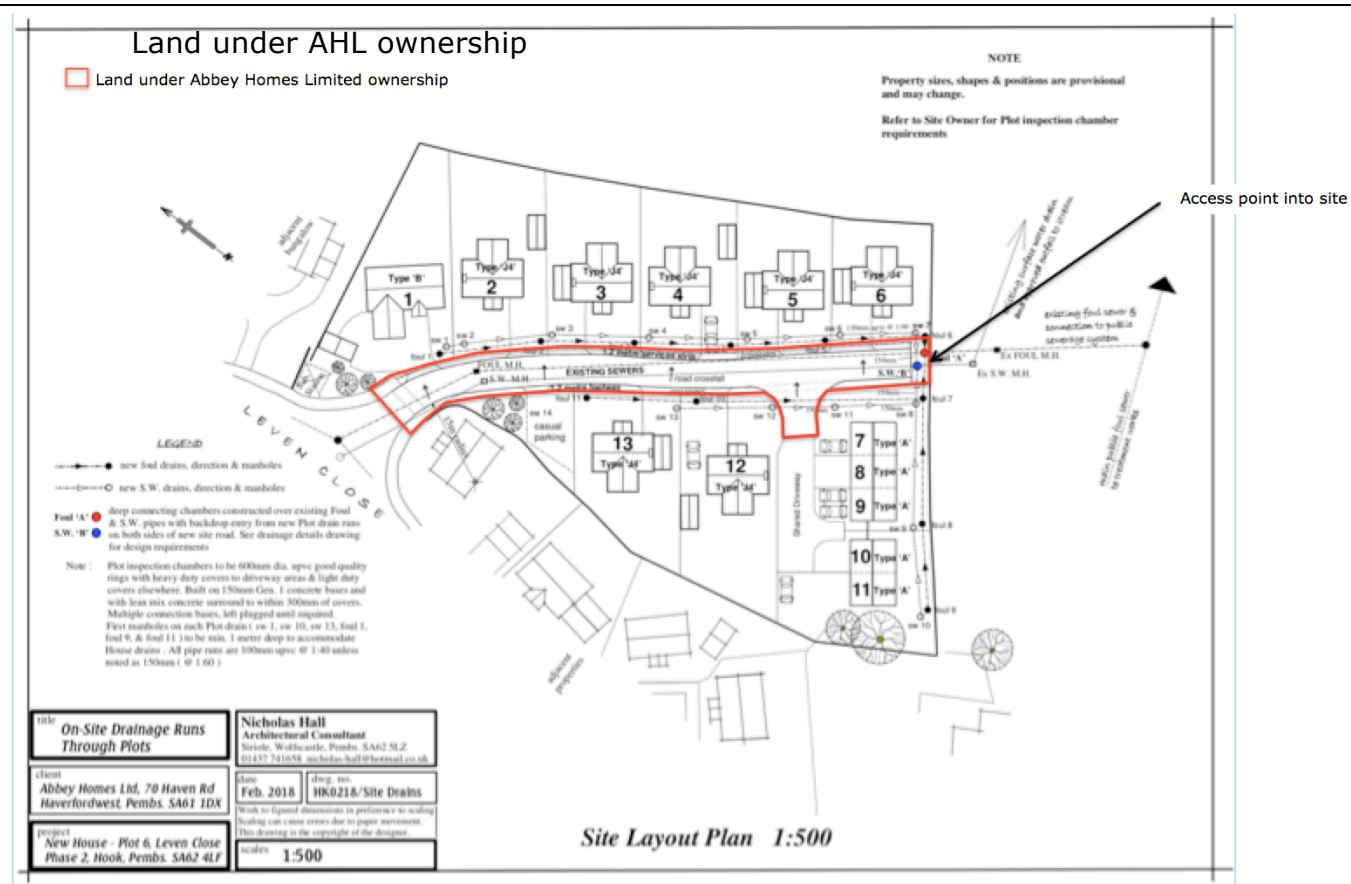


Fig 1 Abbey Homes Limited ownership of main access road and pedestrian footpaths.

In summary, the proposed development site is ideally located to create a sustainable residential housing allocation, adjacent to an existing settlement, in accordance with the LDP deposit plan requirements (GN11, Residential Development, GN14, Residential Allocations and GN15 Small sites target). The proposed CS already retains significant infrastructure adjacent to and on site, for example road access and drainage services, with lands also capable of supporting SAB/ SuDS, biodiversity and Green Infrastructure enhancement.

The failing of the LPA to follow up on prior correspondence (as contained in Appendix B) with the Highways department, identifies that there has been a failure in procedure to fully assess the CS. We therefore respectfully request that details contained within the prior and current consultation responses are re-considered by the LPA and the site is allocated for residential development in the emerging plan.

In the absence of the site being included in any future revision of the plan - prior to the Public Inquiry stage - we request the opportunity to fully review the site allocation and procedural error at Inquiry stages with the appointed Inspector. If the LPA or Inspector requires any further clarification of the proposed CS we would be happy to provide any further details that may support the proposed CS.



<p><i>Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.</i> Tick here if you are submitting additional material to support your representation.</p>	<p>*</p>
<p>6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?</p> <p><i>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.</i></p> <p>6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?</p> <p>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.</p>	
<p><i>Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.</i> I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.</p>	
<p><i>Rwyf am siarad mewn sesiwn gwrandawriad.</i> I want to speak at a public hearing.</p>	<p>*</p>
<p><i>Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').</i> If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').</p>	
<p>Site allocation reference number 268 (as above) and failure of procedure to consider LDP representations for the site</p>	
<p>9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</p> <p>9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i> I wish to be heard in Welsh.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i></p>	<p>*</p>

Cynllun Datblygu Lleol 2 Cyngor Sir Penfro
(Medi 2024)
Ffurflen Sylwadau Cam Adneuo'r
Cynllun Datblygu Lleol 2

Pembrokeshire County Council
Local Development Plan 2 (Sept 2024)
Deposit LDP 2 Representations Form



I wish to be heard in English.	
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Nodiadau cyfarwyddyd

Guidance notes

*Caiff Cynllun Datblygu Lleol Cyngor Sir Penfro ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.*

'Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:

1. Ydy'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)

2. Ydy'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)

3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)

Darperir rhagor o wybodaeth am y profion cadernid a gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.

Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.

Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio am fwy nag un newid i'r

The Pembrokeshire County Council Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.



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

Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid nodi cynrychiolydd y grŵp (neu'r prif ddeisebydd) yn glir.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

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

Candidate Site Submission

Land off Leven Close, Hook, Pembrokeshire, SA62 4LF

Planning and Supporting Document Statement

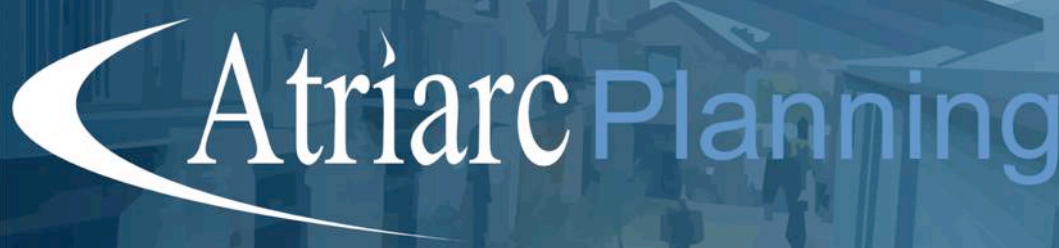
August 2018 (revision I)



Report by: Wayne Reynolds

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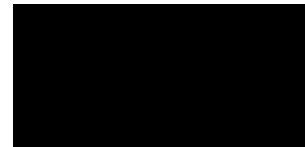
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Client – Abbey Homes Limited
Report by Wayne Reynolds¹

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1.0 Brief

- 1.1 Atriarc Planning has been engaged by Abbey Homes Limited to present the following land, located adjacent to Leven Close, Hook, Pembrokeshire, for residential housing, as part of the Pembrokeshire Council Local Development Plan (LDP) review 2021-2033.
- 1.2 This integrated Planning & Environmental statement has been produced in support of bringing forward the lands for development, following the principles of Planning Policy Wales (PPW 9), whilst also considering wider preliminary development principles, to support the development of a small to medium scale housing site, located in a Service Village (as referenced within the Council's current LDP).
- 1.3 This Planning statement also provides an overview of potential development options on site, to further support the Sustainability Assessment criteria being reviewed by the LPA, developing preliminary design & planning concepts, inline with the objectives of the Welsh Government (figure 1). As a living document the design of any site will constantly evolve throughout the plan process. Indicative design opportunities and constraints have however been identified as part of this review to allow for a clearer understanding of how the site may come forward, to support the level of development proposed - in line with local and national level planning policy.



Fig 1 Objectives of good design page contained within PPW 9 (page 61)

2.0 Site Ownership and Location Details

2.1 Atriarc Planning has been engaged by Abbey Homes Limited (a Pembrokeshire based property development company) to present the following land located adjacent to Leven Close, Hook, Pembrokeshire (fig 2), as a residential housing allocation. NB All correspondence in relation to this candidate site submission is to be addressed via Atriarc Planning.

2.2 There are currently no known restrictive covenants that would prohibit the development site coming forward.

Site Address: Land adjacent to Leven Close, Hook,
Pembrokeshire

Local Postcode: SA62 4LF

Coordinates

X (Easting): 198114

Y (Northing): 211076

Latitude: 51.761879

Longitude: -4.9269010

Grid Reference: SM 981110

Grid Reference (six figure): SM 98114 11076

2.2 The proposed candidate site occupies a parcel of land measuring approximately 0.88Ha / 2.17 acres (exclusive of the blue line areas). The remainder of the site (blue line area) offers further options for development, for example, a new green-space buffer or general environmental enhancement (see plan references 1a and 2a).

2.3 The proposed development site is located adjacent to the main village and currently accessible via Leven Close, an in-progress/ part-complete development site, under development by the applicant (reference planning permission 12/00359/PA).

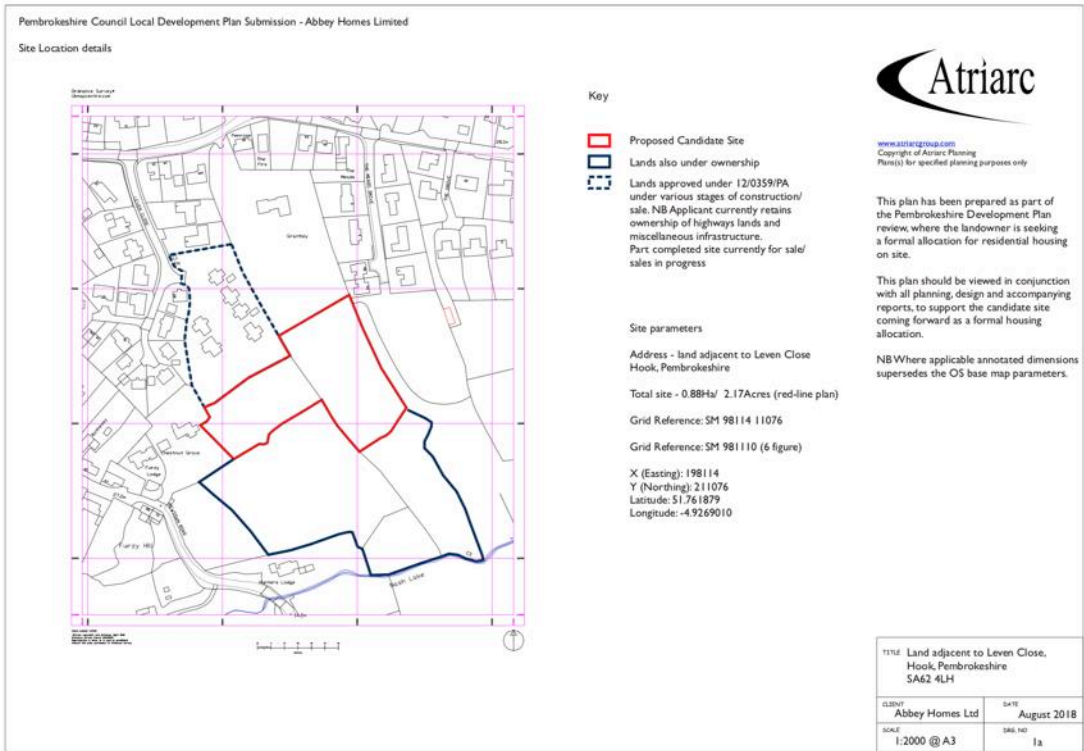


Fig 2 Site Plan (NB also see accompanying scale site plan)

3.0 Background to Development / Site Summary

- 3.1 Hook is a mid-sized settlement found to the east of Maddox Moor and to the north-west of Llangwm, Pembrokeshire. The area of land for potential development is sited adjacent to an existing development site, to the south of Leven Close (within the main village), on land with limited agricultural value. Within the current LDP, Hook is identified as a Service Village with supporting facilities being located in Haverfordwest (a hub town), 4.5 miles to the north/ north-east.
- 3.2 The land currently forms part of an agricultural field that has been cleared as part of a Dwr Cymru drainage upgrade through the main village (see fig 3a, 3b, 4 and plan 2a). The recent Dwr Cymru site clearance, drainage and sewage improvement scheme, has upgraded the local drainage network and capacity serving the main village and surrounding area (see plans contained in Appendix A and B and plan reference 2a that detail the current drainage network in situ).



Fig 3a Existing Site (view north from eastern aspect of site)



Fig 3b Existing (view from south from eastern aspect of site)



Fig 4 Existing (view east, north-east back to existing housing area from western aspect of site)

- 3.3 Residential dwellings enclose the proposed candidate site on the northern, eastern and western boundaries. The boundary to the south is partly enclosed by a single residential dwelling (Hunter's lodge) with the remaining boundary adjoining agricultural lands.
- 3.4 Leven Close provides the primary access route to the site, connected to Pill road to the north.
- 3.5 The outer candidate site boundaries (see plan 2a) retain a semi-mature/ mature hedgerow, interspersed with a variety of native hedgerow species and trees. Given the nature and enclosure of the site by the existing outer boundary hedge; all semi-mature and mature hedge-rows and trees are currently proposed to be protected from any development. NB A preliminary Ecological appraisal of the site and wider area is also attached to this report.
- 3.6 The developer's preferences would be to develop a low-density scheme on site, creating large, detached executive homes. The existing/ under development site (to the north of the proposed candidate site) retains a planning permission for the construction for 13 dwellings on site. Within the former JUDP; the JUDP noted that this site was capable of supporting 20 units on site. However when detailed planning permission was submitted, the developer reduced this number to accommodate 13 units. The reduction in density was derived from the provision of larger units on site with extended garden and garage areas. Under the more recent LDP; the site is noted as capable of supporting 15 units. This allocation is referenced in the current LDP, allocation reference HSG/044/0050 (currently under construction/ part complete). The LDP notes that a minimum of 15 units should be developed within the 0.59Ha site, with a provision for 10% affordable housing on site.
- 3.7 Based on the former precedent set by the JUDP, we consider that there is a further (minimum) supply of 7 units capable of being supported on the newly

proposed candidate site. This would follow the developer's preference for a low-medium density scheme. This is founded on the developer's extensive knowledge of local housing market demands, notably seeing a shortfall in the provision of high-quality executive homes in Pembrokeshire. The lower than average density is not however fixed and a higher density could easily be achieved on site. NB The presence of a main sewer line running through the site would also impact on the location and siting of any new housing - which would support a low-density scheme coming forward on site. The final density of any scheme would however be subject to a detailed site layout and also dependent on the proposed house types e.g. bungalows, two-storey semi-detached dwellings and/ or two-storey detached dwellings. All values provided are currently for guidance purposes only.

4.0 Land Use Planning (existing)

4.1 Existing and previous use of the site

- 4.1.1 The site has been under the ownership of the developer for a number of years and formed part of the purchase of lands inclusive of the lands/ current construction site to the north.
- 4.1.2 Properties along Leven Close comprise of a mix of large, detached bungalows (with attic conversions) and detached two-storey dwellings. Leven Close has a varied palette of materials including; stone facing and rendered elevations; natural slate roofs, and; UPVC and timber windows and doors.
- 4.1.2 No formal structures or outbuildings are present on the proposed candidate site however recent drainage upgrades by Dwr Cymru are visible on the ground.
- 4.1.3 Due to the high potential for supporting a residential housing scheme on site (and to complete the cul-de-sac) the land has subsequently been submitted as a candidate site. Subject to an allocation Abbey Homes Limited would seek to develop the site to complete the cul-de-sac. It is noted that the developer has previously developed the majority of the housing on Leven Close and has a long-term focus to provide high-quality family housing units in the village. The developer also has a long track record of developing sites throughout Pembrokeshire.

4.2 Site Overview (Topography)

- 4.2.1 The proposed candidate site consists of low grade agricultural/ amenity land enclosed by an in-progress residential development site to the north. The land remains relatively level throughout, however there is a minor drop in land level to the southern edge of the eastern field. The relatively level candidate site presents no topographical issues on site. The site is self-

contained, retaining a semi-mature/ mature, hedgerow to the southern, eastern and western boundaries. A variety of native hedge-row species are found within the outer hedge-rows that would be protected from any development on site, to protect both visual amenity and onsite ecology. The protection of the hedge-rows, along with the provision of further planting/ landscaping measures, also offers the opportunity to lessen any visual impact arising from the development of the candidate site (which could be subject to a landscape plan/ planning condition at detailed design stages). NB Please also see the appended Ecology report for preliminary ecological development recommendations/ options on site.

4.2.2 The wider lands to the south (outside of the applicants ownership) fall to the south, towards a stream, noted on plan as Nash Lake. NB There is a relatively steep drop in land level from the southern edge of the proposed candidate site down to the fields adjoining the proposed site (blue line area), which are largely overgrown with a variety of native trees, shrubs and grass species.

4.2.3 Views to the north, east and west (from site) are dominated by the village backdrop. The neighbouring dwellings consist of detached bungalows and two-storey detached dwellings set on a relatively level area of land.

4.3 Land Use Classification - Grade

4.3.1 The existing site is characterised as green-field land within the current Pembrokeshire Local Development Plan (LDP) up to 2021. The site is currently cleared pasture following on from the recent Dwr Cymru drainage works. Overall the lands have been currently assessed as falling within a Grade 4 classification (under the Agricultural Land Classification System - ALC). However lands could be improved to fall within a grade 3b classification (albeit having limited overall agricultural value due to location and size).

5.0 Proposed Candidate Site Land Use/ Development outline

- 5.1.1 The candidate site is being submitted as a residential housing allocation.
- 5.1.2 Based on the following and above site parameters we currently propose that the site could support up to 7 executive homes on the development site (dependent on density and future layout). The site can also accommodate affordable housing on site, or alternatively, affordable housing provision could be provided on the lands owned by the applicant within the in-progress site, varying the existing consent (reference planning permission 12/0359/PA). This would fulfil a clear need identified by the LPA's current affordable housing figures for the Hook ward. NB The total level of housing is however dependent on the type and form of dwellings proposed. Current affordable housing demands for the Hook area are for 1 and 2 bedroom units.
- 5.1.3 Within the village a mix of house types is present including bungalows and two-storey dwellings. Any detailed design for the site will likely seek to provide large, two-storey detached dwellings on site, with large garden areas to the front and rear of the dwellings. Large bungalows (with attic conversions) are however also a possibility.
- 5.1.4 The current Affordable Housing rate in the Hook area is 10% (as noted in the adopted Pembrokeshire Council, Affordable Housing Requirements, reference table GN27, Residential Allocations). However, each development site is also subject to detailed review at planning stages, as per standard practice. No notable erroneous development costs/ constraints have been identified at this stage. NB Drainage lines have already been provided on site, which assists lowering development costs. Given the size of the proposed development site, it is likely that any affordable housing requirement could be provided as an onsite provision comprising of a mix of one or two bedroom units. Options are also available for an off-site financial contribution to put monies towards other affordable housing schemes in the village and/ or ward area.

Additional comments on the site

- 5.1.4 The current LDP notes the important qualities for preservation. For example, landscape (visual impact), ecology and highway safety. It also recognises the important part the Local Planning system plays in the development process, to create sustainable and viable communities. Low impact residential development (and sites that can support a good level of affordable housing – on or off site) is also considered to be key to support this objective.
- 5.1.5 The site is located adjacent to the existing Service Village (Hook). Development pressures for housing in the area place a responsibility on the LPA to cater and provide for a range of housing types for the existing and

growing population in and around Hook ward, wider villages and towns in Pembrokeshire. The site offers the opportunity for the development of low carbon homes, connected to the countryside with good access to local public services. Whilst it is recognised that the expansion of the settlement will give rise to visual changes; based on the demands for housing in the area (and subject to a detailed design); we consider that these matters could be successfully designed and integrated into any proposal.

- 5.1.6 The provision of a wildlife and landscape buffer zone along the sites wider southern boundary would also ensure that the visual impact of the development is reduced and natural environs protected. Further provisions can also be accommodated due to the limited physical alterations to the site, to bring forward any future development.

6.0 Site Planning History

- 6.1.1 A review of the Council online planning search facility has identified a variety of recent planning applications relating to the proposed candidate site and the adjoining site to the north.
- 6.1.2 In relation to the adjoining site to the north (forming the main access to site via Leven Close) the following applications have been noted,
- 10/0524/ PA – Outline residential housing development – refused (drainage and sewage concerns)
 - 12/0359/PA – Outline residential housing development – conditional approval (improvements to drainage and sewage network increased capacity from 1st April 2015)
 - 14/0637/PA – Conditional approval/ reserved matters
 - 15/0932/PA – Removal of conditions 13, 14 & 15 (code for sustainable homes) of planning application 12/0359/PA – conditionally approved
 - 15/1177/PA – Reserved matters in respect of appearance and scale of drawings – conditionally approved
 - 16/0423/PA – Two storey dwelling – Conditionally approved
 - 17/1136/PA – Removal of condition 9 (Design/ construction of internal estate roads) and variation of condition 10 (access road and surface water details) of planning permission 15/0932/PA (removal of conditions 13, 14 and 15) of planning application 12/0359/PA (residential development outline) – to be determined
 - 17/1155/PA – Erection of a house – to be determined
- 6.1.3 In relation to the development site, the following planning application has been noted
- 14/1158/PA – Development of five dwellings (planning permission refused)
- 6.1.4 In relation to the former refusal on site, it was noted that the primary reason for refusal related to the site being designated as open countryside outside

that of any LDP allocation. The secondary reason related to the potential presence of historic coal mining activity in the locality.

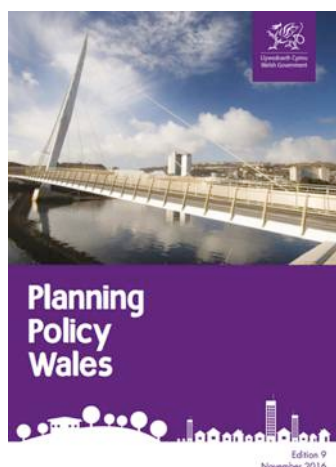
- 6.1.5 Subject to a formal residential allocation, the site would overcome the first reason for refusal. In relation to the second reason for refusal (coal mining); the applicant notes that a detailed Coal search was undertaken during the purchase of the lands (linked to the former development of Leven Close). A copy of this report has been requested and will be submitted to the LPA shortly. It is noted that there was no objection from Dwr Cymru in relation to the 2014 planning application to provide further housing on the lands following the upgrades to village sewage and drainage services.

7.0 Policy Framework

- 7.0.1 A variety of planning considerations and policies have been taken into account when developing this candidate site submission - in general and specific terms.
- 7.0.2 The current primary policy framework consists of;
- Planning Policy Wales, Edition 9 (November 2016);
 - TAN 12 (2016);
 - TAN 15 (2004);
 - TAN 23 (2014), and;
 - Pembrokeshire Council Local Development Plan (up to 2021).

7.1 National Policy

7.1.1 Planning Policy Wales (PPW), Edition 9 (November 2016)



7.1.2 PPW is the principal document that sets out the criteria and context for promoting sustainable development in Wales. The key focus for promoting sustainable development is to ensure a continuous supply of land is available to meet the needs of the current generation, but without compromising the needs of future generations. PPW also reinforces the importance for the long-term provision of housing (and social housing) across Wales, developed through the Local Plan system.

- 7.1.3 As a national planning document, PPW provides an over-arching set of policies focussed towards sustainability, housing, business and economic growth. The recent edition of PPW reinforces the important contribution housing development provides to the local economy and community. This is now also supported by a recent publication by RTPi Cymru and the Welsh Government, which now monitors the important economic contribution development projects provide to the Welsh Economy². Considering the nature of the proposed candidate site; the proposed allocation will therefore not only support a long-established local business (providing further work

² <http://www.rtpi.org.uk/briefing-room/news-releases/2018/june/rtpi-cymru-launches-value-of-planning-tool/>

opportunities for local contractors) but also provide additional housing for the local community.

- 7.1.4 PPW notes a series of key priorities for key settlements, for example, to secure a thriving and diverse local economy, supporting business growth whilst also balancing environmental considerations. PPW also promotes development within existing urban centers, recognizing that extensions to village limits are supported where wider infrastructure and public services are already in situ. The site is located adjacent to the existing settlement in a relatively self-contained field, with full access to adjacent/ on-site infrastructure services.
- 7.1.5 Due to the size of the site, the proposed site is likely to come forward releasing the properties for construction/ sale over a period of 1-2 years following planning approval. A capacity search has noted that existing infrastructure is capable of supporting the proposed development (see Appendix A). This follows on from the applicant allowing Dwr Cymru full access to lands to provide new drainage lines to the village, to increase capacity for current and future developments.

7.2 Technical Advice Note 12 (TAN 12) Design (2014)

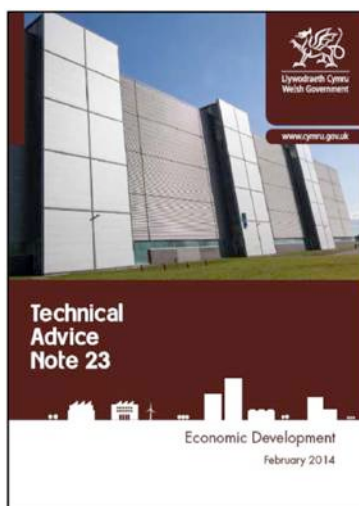


7.2.1 TAN 12 identifies the key considerations concerning design, for example, considering the impact of any development on surrounding/ existing communities, the built form and wider natural environs. TAN 12 also recognises that the planning system plays an important part in supporting the delivery of sustainable housing within Wales.

7.2.2 Good design can ensure any development reflects local character and form, alongside enhancing or improving existing environs, to the benefit of the wider area.

- 7.2.3 Considering; the existing access road and infrastructure in situ; the residential nature of the adjoining lands to the north, east and west of site, and; taking into account the existing boundary enclosure (to be retained) to the south; it is considered that the new allocation would not see any harm to the local natural environs or local amenity. The creation of a wildlife buffer zone along the sites southern boundary could also link in to wider village areas, providing a new greenspace for residents to enjoy (accessible from Leven Close) or form part of a wider amenity/ agricultural parcel of land linked to the sale of one or more of the future dwellings.
- 7.2.4 The siting and size of the dwellings along with the proposed building typology can be tailored to the site, to lessen any impact on the setting of the site and wider lands whilst also balancing any potential visual impact. The preliminary opportunities and constraints plan details preferred access routes within the site. However, further options are available to review at detailed design stages. The siting of any dwellings would also need to take into account the positioning of the sewer line running through the site (minimum off-set distance from 3m, but can be increased depending on the specific nature of the build and location of any connection chambers).
- 7.2.5 Design policy attributes are also considered in the following section of this Concept and Local Policy assessment report. An Ecology report is also appended to this submission (also used to inform the preliminary site opportunities and constraints plan).

7.3 Technical Advice Note 23 (TAN 23) Economic Development (2014)

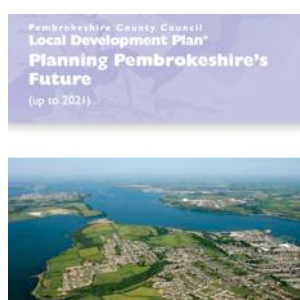


7.3.1 TAN 23 offers clear support for providing a small-medium scale housing allocation - supporting the growth of local enterprises. The allocation of the site would support a local construction contractor, suppliers as well as provide much needed affordable and commercial housing in the popular village. The development also offers the opportunity for self-build options on site, providing serviced plots for sale.

7.3.2 Clear benefits will also be derived from creation of extended employment opportunities for contractors as well as technical and non-technical services.

7.3.3 Considering the scale of development and nature of the housing allocation, the development is well supported from an Economic policy perspective.

7.4 Local Plan Policy – Pembrokeshire Local Development Plan (up to 2021)



7.4.1 The Pembrokeshire Local Development Plan (up to 2021) notes a variety of policies in general and specific terms of relevance to the proposed candidate site submission.

7.4.2 In relation to the proposed development, the following key policies and strategic principles have been noted.

Adopted 28th February 2013
*For the County including the area of Pembrokeshire Coast National Park



Settlement Hierarchy

7.4.3 The settlement framework provides a key focus for growth, linked to population levels and the availability of a range of services and facilities in situ. The provision for growth and new housing allocations is focussed to sustainable locations in accordance with the Settlement Strategy.

7.4.4 Within the current LDP, Hook falls within a defined Sustainable Village location (fig 5), serviced by Haverfordwest (a Hub Town). Paragraph 5.58 of the current LDP also states,

5.58 The capacity of infrastructure has helped to shape the settlement strategy. By focusing development in villages and towns with existing services and facilities there should be a reduction in the pressure to provide new facilities. This approach will also support those services and facilities already in existence. Site allocations have taken into account deliverability and have been informed by Dwr Cymru Welsh Water and Environment Agency advice on infrastructure, water resources, surface water drainage and flood risk, to ensure that development is directed to settlements where capacity is available or is likely to be made available in the Plan period with some allocations phased to take account of current infrastructure constraints.

7.4.5 The landowner has been involved in detailed negotiations with Dwr Cymru for a number of years to provide capacity for the existing and now proposed site, as well as negotiating access for Dwr Cymru sewage and drainage line upgrades for the wider village. The current village and drainage lines are contained within Appendix A, B and noted on plan 2a. Clear capacity is available to serve the proposed allocation with connections points already available on site.

7.4.6 In relation to the development site, paragraph 5.59 is also of particular relevance.

5.59 Housing development in Pembrokeshire is heavily reliant on the many builders who focus on developing smaller sites. Part of the reason that Pembrokeshire's housing completions have remained relatively stable in recent years, despite economic fluctuations, is because building on such a scale is more resilient to market forces and easier to finance. Hence, in terms of deliverability, the approach in rural areas has been to enable smaller sites to come forward.

7.4.7 In the past, the developer has sold off serviced plots to local families seeking to build their own dwellings. The self-build principle can also be provided on the new allocation site, as the developer has already met much of the expense of upgrading local infrastructure as well as provided a service road leading to the edge of site. The extension of the service road and provision of utilities can therefore meet the requirements of the above policy sub-text, which seeks to support sites that are resilient to market changes.

7.4.7 The proposed allocation meets the key principles of the current LDP focussing development to service villages with supporting infrastructure in situ e.g. sewage and drainage, local facilities etc... Hook (and wider area) is well served by local facilities, which are vital to supporting the principles of sustainability. Within the settlement these include a; village shop; recreation area; various sports clubs; B&B/ holiday accommodation; a primary school, and; a village hall. The site is also located on a primary bus route to the surrounding towns and villages.

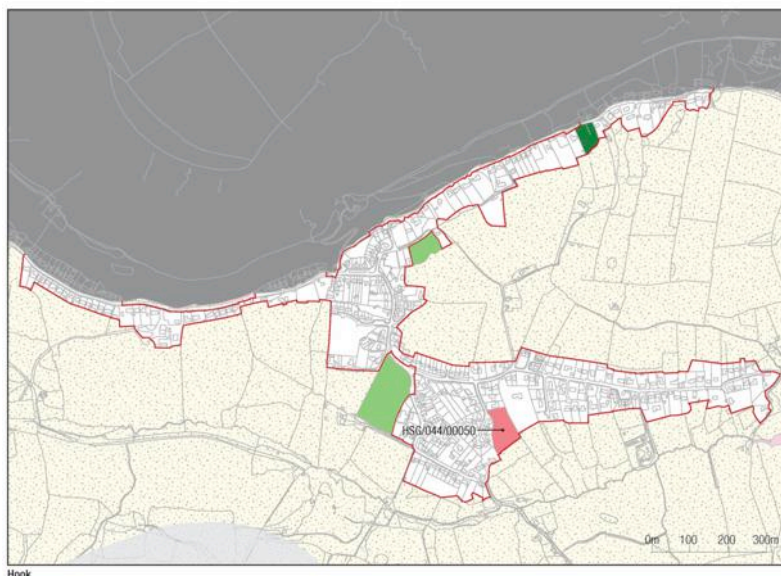


Fig 5 Extract from PCC LDP Hook Allocation

General Planning Policies

- 7.4.8 The development site also falls within the scope of Policy GN22 (fig 5). Policy GN 22 notes,

GN.22 Prior Extraction of the Mineral Resource

Where new development is permitted in an area of mineral resource, prior extraction of any economic reserves of the mineral must be achieved, wherever appropriate in terms of economic feasibility and environmental and other planning considerations, prior to the commencement of the development.

- 7.4.9 Policy GN22 relates to the protection of active coal-fields and mineral resources. The extraction of mineral resources at this location is highly unlikely due to the current residential nature of the village and wider surrounding lands. If ever developed for mineral extraction; given the proximity of existing dwellings, it is considered that there would likely be a high degree of harm to residential amenity without relocating residents, or from implementing costly protection measures to reduce any noise and dust from extraction methods. Intensive, heavy vehicular activity in the vicinity of existing dwellings may also give rise to amenity concerns. Considering the current private ownership of lands, this would likely require a CPO to secure the lands for mineral extraction purposes. Considering the above matters, the likelihood of mineral extraction at this location is considered to be minimal. In relation to former mining activities please see paragraph 6.1.5.
- 7.4.10 One of the key guiding policies within the current LDP, focuses to ensuring sustainable high quality design. The principles of the preliminary concept plan support the policy requirement, taking into account the natural, physical and social environs on site and in the surrounding area. Policy GN2 Sustainable Design, notes,

GN.2 Sustainable Design

Development will be permitted where relevant criteria are met:

- 1. It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context;*
- 2. It is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout;*
- 3. It incorporates a resource efficient and climate responsive design through location, orientation, density, layout, land use, materials, water conservation and the use of sustainable drainage systems and waste management solutions;*
- 4. It achieves a flexible and adaptable design;*
- 5. It creates an inclusive and accessible environment for users that addresses community safety;*
- 6. It provides a good quality, vibrant public realm that integrates well with adjoining streets and spaces and*
- 7. It contributes to delivering well- designed outdoor space with good linkages to adjoining streets, spaces and other green infrastructure.*

7.4.11 In relation to the above policy criteria; the proposed development can be designed to integrate the proposed dwellings within the parameters of the development site, protecting local ecology and biodiversity matters, whilst also providing generous sized amenity spaces for future occupiers. The preliminary opportunities and constraints plan has also taken into account the potential access revisions to provide a safe accessible point for future vehicles and pedestrians.

7.4.12 Considering the potential siting of dwellings (following the preliminary access routes prepared); the proposed candidate site is not considered to raise any amenity issues, highways conflicts, nor adversely affect any neighbouring occupiers. From a design perspective, the proposed development site is therefore considered to be generally supported by policies within the current and emerging LDP. Whilst the land is currently designated as countryside, the extension of the residential curtilage to include this land is considered to follow the design ethos of the current Local Development Plan policy and (by virtue) the emerging policy and sustainability appraisals that form part of the candidate site assessment process.

7.4.13 Given the preliminary opportunities and constraints identified, the indicative draft access route and the potential housing arrangement (following the access road alignment - see plan 2a); it is considered that there is a wide scope for developing a sensitively designed scheme within the confines of the site. The provision of a mix of large detached dwellings following the existing material palette of the village, would ensure that the proposed site would sit comfortably within the existing landscape and protect local amenity. The development of a sensitive scheme can therefore fall well within the development framework assessment guidance. A summary of the design and siting principles of the proposed dwellings within the candidate site plan is also provided in the following Design chapter analysis.

8.0 Outline Site Design and Environmental Considerations

- 8.0.1 To develop the current candidate site submission; the preliminary design and planning considerations included;
- Access on to site and within the surrounding area;
 - Guiding principles/ opportunities and constraints of the site
 - The potential scale and design of the development layout;
 - Siting and impact on surrounding natural environs;
 - Community facilities and impact on existing residents;
 - Landscaping and protection of trees and hedge-rows, and;
 - Local infrastructure service availability.
- 8.0.2 The above items are reviewed in more detail throughout the following analysis.

8.1 Accessibility and Access Considerations (including movement to, from and within the development site)

Access from the existing public (adopted) highway and proposed Highway Access Arrangements

- 8.1.1 The area of land for potential development is sited off Leven Close, a circa 5.5-5.8m wide road, serviced by pedestrian pathways either side of the main carriageway. Within the close part of the road also follows the principles of a shared access road surface, leading to properties to the west (completed cul-de-sac). The primary access road connects to Pill Road and later New Road, leading to the north-south local distributor road, the A487, travelling north to Haverfordwest or south to Milford Haven.
- 8.1.2 Based on the current highway arrangement and density precedent set by the former allocation within the JUDP; the existing highway is considered of sufficient scale to accommodate the proposed development. Indicative access routes are identified on plan 2a following the line of the current sewage network. NB further highways designs can be prepared if required, as sufficient lands are available to provide a new access road within the development site.
- 8.1.3 Given the size of the candidate site sufficient highways access could be provided within and to the site. Whilst there are pinch points within the main village and surrounding road network, the existing road within the village is considered to be able to support additional traffic flows (with only a minor increase in traffic during peak travel times). Considering the scale of development any additional vehicles would only have a minimal impact on the wider road network.

- 8.1.4 Following a review of CrashMap road safety statistics (fig 6); no known road accidents have been identified in the vicinity of the existing road entrance or wider village area.

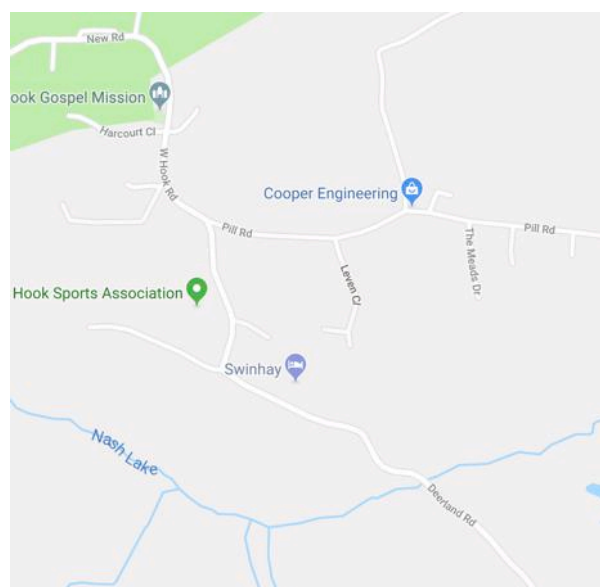


Fig 6 Crash Map Extract (extract dated 10th August 2018)

- 8.1.5 Whilst subject to detailed design requirements; given the density proposed it is currently considered that the site could accommodate generous garden and off-street parking areas, to serve the new allocation.

8.2 Sustainable location

- 8.2.1 The site is located within a Sustainable Village, which is well served by local transport services and the wider road network.

8.3 Public transport

- 8.3.1 The nearest bus stop is currently located approximately 361m to the north-east (via the road network) within main village. The 308 bus service connects to Haverfordwest town centre which retains wider national public transport interchanges. A national train service also operates from Haverfordwest. A range of sustainable transport modes is therefore accessible for current and future residents.



Haverfordwest Bus Station - Haverfordwest Bus Station via Llangwm - Burton

Monday to Friday (Excluding Bank Holidays) (Outbound)

	Days:	SH	SD						
	Notes:			HM	HM	HM	HM	TRQ	
Haverfordwest Bus Station 3	--	--		0910	1110	1310	1610	1740	
Horsefair	--	--		0913	1113	1313	1613	1743	
Merlins Bridge Roundabout	--	--		0915	1115	1315	1619	1745	
Merlins Bridge St Issell Avenue	--	--		0918	1118	1318	1622	1748	
Freystrop Cross	--	--		0924	1124	1324	1628	1754	
Hook	--	--		0928	1128	1328	1632	1758	
Llangwm Green	--	--		0934	1134	1334	1638	1804	
Houghton	0745	0746	0936	1136	1336	1640	1807		
Burton Jolly Sailor	0748	0748	0938	1138	1338	1642	1808		
Rosemarket	0754	0754	0944	1144	1344	1648	--		
Sardis	0800	0800	0950	1150	1350	1654	--		
Hill Mountain	0802	0802	0952	1152	1352	1656	--		
Llangwm Green	0806	0806	0956	1156	1356	1700	--		
Hook	0812	0812	1002	1202	1402	1706	--		
Freystrop Cross	0816	0816	1006	1206	1406	1710	--		
Merlins Bridge St Issell Avenue			1012	1212	1412	1716	--		
Merlins Bridge Roundabout	0822 ^L	0822 ^L	1015 ^L	1215 ^L	1415 ^L	1719 ^L	--		
Horsefair	0830	0830	1020	1220	1420	1725	--		
Haverfordwest Bus Station 3	0835	0835	1025	1225	1425	1730	--		

Notes:

SD Schooldays Only

SH School Holidays

TRQ to Rosemarket on request

L Stops at Haverfordwest Lidl at request to driver and if safe to do so.

HM Operates to Hill Mountain by request only

Fig 7 Bus Route 308

8.4 Public Rights of Way

- 8.4.1 Following a review of the Pembrokeshire Rights of Way maps; there are no known Public Rights of Way (PRoW) through the site. Multiple PRoW's are however noted in close proximity to the site (fig 8). The allocation of the site and improvement to the adjoining road is therefore considered beneficial to supporting walking in and around the village with further options available to explore connections to additional amenity lands to the south of site.

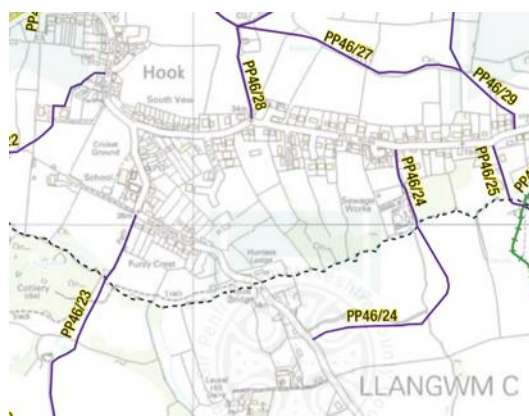


Fig 8 Extract of PCC Public Rights of Way Map

8.5 Walking and cycling

- 8.5.1 The scale and design of any access roads could replicate that of the existing highway network comprising of circa 5.5-5.8m wide roads with accompanying circa 1.5m wide pedestrian pathways; allowing safe access and egress for pedestrian traffic to and from site. Shared surface roads could also be incorporated in to the design of the site. The proposed candidate site is located adjacent to the existing village with excellent access for walking and cycling. The site is well located for residents to enjoy the PRoW's found within the wider village (fig 8). The allocation of the site is therefore considered to support general health and wellbeing. The development site could also allow for new ProW's to and from site, enhancing and creating safer access for local foot and cycle traffic in the village.
- 8.5.2 The development of the site would not impinge any cycle routes. The existing highway arrangement provides local cycling options which when combined with the location of wider public transport services; provide a wide range of sustainable transport methods. The local bus routes also supports cycling activities farther afield allowing direct access to coastal and inland towns and villages e.g. Pembrokeshire Coastal Path.

8.6 Nearby commercial facilities (e.g. local shop etc)

- 8.6.1 The nearest commercial/ village shop is located within the village, approximately 450m to the north-east of the candidate site (via the existing road network). The village retains a; village shop; recreation area; various sports clubs; B&B/ holiday accommodation; a primary school, and; a village hall. However, further commercial and public provisions are also available in surrounding towns and villages such as Freystrop, Llangwm and Haverfordwest.

8.7 Public Open Space

- 8.7.1 The village retains a large public open space located approximately 450m to the east of site (via the local road network). Further recreational parks and facilities are also found within the main urban centres (Haverfordwest), which provide a variety of social and recreational facilities. The village is also well connected to a variety of public rights of way linked to the Pembrokeshire Coast, Coastal paths and inland waters. Further public space provision could also be provided on the applicant's lands, to the south of site within the blue line area.

9.0 Environmental Sustainability

9.1 Environmental Overview

- 9.1.1 The site is currently designated as a greenfield site within the current LDP. The site consists of a grassed pasture/ field, as previously described in the Land Use Classification description.

9.2 Landscape, wildlife, historic or archaeological features or designations affecting the site

- 9.2.1 An initial review of landscape, wildlife, historic (or archaeological features) or other designations potentially affecting the site has been undertaken. In relation to the local landscape the primary information collated has been derived from Landmap in table 1 and figure 9 (overleaf).

Table 1 Landmap information record

Landmap record	Area Unique ID	Area Name	Classification/Evaluation
Geological	PMBRKGL131	Simpson Cross	Undulating lowland hill terrain (Evaluation: Moderate)
Landscape Habitat	PMBRKLH807	South of Haverfordwest	Mosaic (Evaluation: Low)
Visual & Sensory	PMBRKVS114	NA	Rolling Farmland (Evaluation: Moderate/ High)
Historic Landscape	PMBRKHL43898	Hook	Evolved/ Mixed Fieldscape (Evaluation: Moderate)
Cultural Landscape	PMBRKCLI96	Lowlands	Agricultural (Evaluation: High)

- 9.2.2 Considering the nature and enclosure of the site and the preliminary items presented above; the proposed candidate site would have little impact on the above landscape designations. The site is relatively self-enclosed by the current boundary hedgerows and existing built form to the east, west and north of site. The level nature of the site would allow up-to two storey

dwelling to sit comfortably within the boundary enclosure, with limited views from the adjoining public road.



Fig 9 Extract from Landmap

- 9.2.3 The local landscape designations identify the majority of lands as falling under a general countryside provision. A review of MagicMap Environmental data did not identify any relevant environmental landscape protective designations on site (fig 10). The hatched area shown in figure 10 relates to the Built up Areas mapping system of England and Wales that identifies key settlements and built structures. Green coloured areas to the south-west reference an area of broadleaved woodland. Farther north and within the Cleddau river an SSSI and SAC is noted. However considering the offset distance and nature of development proposed, it is considered that the proposed development would have a limited impact on these designations. A preliminary ecology survey is however attached to this report.

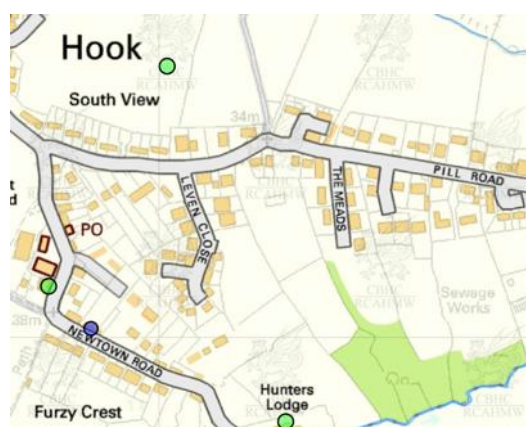
9.3 Visual Impact - Views into, out of, or through the site that should be retained

- Candidate Site Submission Report**
August 2018

This forms a principle of PPW and overarching content contained in the Council's current LDP.

9.4 Historic Designations

- 9.4.1 A review of Historic Wales's mapping system has not identified any protected structures on site (fig 11). However historic records have been identified in the wider area.
- 9.4.2 One historic record is noted to the south of the proposed candidate site, reference a former Hunters/ post-medieval lodge. The reference was shown on the 1965 OS Map (6th Edition) however no further details have been noted. Wider general historic records are located away from the site however they not considered of relevance to the proposed candidate site submission due to the off-set distance.



**Fig 11 Extract from Historic Wales Mapping System
(also see accompanying plans)**

9.5 Site Contamination

- 9.5.1 As a greenfield site there is a low likelihood of any ground contamination being found on site. However as with standard development practice; employing a precautionary principle on site (during any excavation phase) is advised. NB Recent excavations for the new Dwr Cymru drainage and sewage lines did not note any contamination issues on site.

9.6 Flood Risk



9.6.1 As part of this review (and in consideration of items within TAN 15); NRW flood maps have been consulted.

9.6.2 An extract from the NRW flood risk mapping system is provided within figure 12 below. The former drainage ditches are noted on plan as potential low risk sources of surface water flows within the eastern area of the site. However following the upgrades undertaken by Dwr Cymru, no surface water flows are noted that would limit the development of the site coming forward. A new surface water ditch and underground surface water drainage system now redirects former flows to Nash Lake stream to the far south. The new infrastructure in place has therefore updated the current situation on site. The NRW flood risk map is therefore considered to be out of date and surface water flows have been re-directed (see fig 3b highlighting newly implemented above ground drainage ditches).



Figure 12 Extract from NRW's flood mapping system

9.6.4 In light of the NRW flood map data and the above information, it is considered that there are no potential flood risks on site. In review of the above matters, we would therefore conclude that there is no limitation to developing the main site from a potential flood risk perspective.

9.7 Waste Management

9.7.1 Waste management information is not wholly applicable (at this stage). However the principles of waste limitation, recycling of construction and domestic waste materials, will be considered and presented to the LPA at detailed design stages.

10.0 Infrastructure, Utilities and Deliverability

- 10.1.1 The site is well located to connect into existing infrastructure services. Dwr Cymru drainage lines traverse the site with new optional chamber connections already in situ. The recent upgrade of the village's services was undertaken with consent of the landowner on the provision of suitable drainage services for the adjoining and now proposed development site. Water connections are also readily available within Leven Close, implemented by the developer (see appendix A and B and plan 2a).
- 10.1.2 Western Power electrical connections are available on site. BT telecoms services are also readily available. NB All service connections would be subject to further review at detailed design stages.
- 10.1.3 In consideration of the above; there are no current known constraints or abnormal costs associated with developing this site that may affect deliverability or viability.

11.0 Character (including Scale and Design)

11.1 Character Analysis (including Scale and Design)

- 11.1.1 The scale and design of any buildings on site could replicate that of the adjoining residential housing, comprising of large detached two-storey dwellings. Given the residential nature of the surrounding area and the wider natural landscaping enclosing the site, the proposed building typology would sit comfortably within the setting of the existing site and wider village.
- 11.1.2 Considering the off-set distance of existing properties within the main village and the fact there are only limited vantage points of the proposed candidate site from this area; no harm is considered to occur to local residential amenity.
- 11.1.3 In order to protect the characteristics of the village; the materials and built form should replicate that of the predominant neighbouring building materials, comprising of rendered and stone facing elevations, natural slate roof tiles, UPVC windows and doors. Considering the potential use of materials; the proposed candidate site would compliment the existing housing built form and will have a limited impact on the local landscape or built form.
- 11.1.4 Given the location and siting of the proposed allocation; subject to following the above design principles, no harm is considered to arise from the proposed development, from a design or character perspective.

11.2 Neighbouring land uses and amenity

- 11.2.1 Residential lands extend to the north, east and west of the site forming the back-drop of the site. Neighbouring agricultural lands to the south retain little agricultural/ productive value in current form. Considering the nature of the development and surrounding land-uses; the proposed development should see no detrimental impact to neighbouring amenity, due to existing boundary hedge-rows in situ and the potential off-set distance of the proposed dwellings from the existing built form.

11.3 Trees and Hedge-rows

- 11.3.1 The proposed development would not see the loss of any TPO trees nor require major site works on site, other than general land clearance for foundation purposes. No formal hedge-rows would need to be removed from the development of the site. Further planting and mitigating measures could also be incorporated on the sites southern edge of site.
- 11.3.2 A preliminary ecology study has been undertaken. Subject to a formal allocation, further survey work would be undertaken prior to detailed

planning stages. However, at this stage no issues have been noted on site that would limit the development site coming forward.

12.0 Site Sustainability

- 12.1.1 The LPA has a mandate to ensure an adequate supply of housing is focussed to the sustainable settlements. The proposed site presents a unique opportunity for a logical extension to the current village boundary, located adjacent to an existing sustainable settlement. Considering the nature of the development proposal; the site follows the LPA's settlement hierarchy as well as chapter 4.7 of PPW, to focus development to such sites during the LDP candidate site assessment process.
- 12.1.2 The site also follows many of the planning principles contained within Pembrokeshire Council's current LDP. The current LDP clearly notes that housing supply in (and adjacent to) existing settlements is key to ensuring housing demands are fulfilled for a variety of homeowners, with a range of housing types across the County. The proposed site could provide a key housing site to meet the growing needs for the existing and future community, as well as support the local economy, businesses and building contractors.

13.0 Development time frames to bring the site forward for development

- 13.1.1 Subject to an allocation and based on current estimated time scales for a site of this size (as well as considering time frames for the completion of planning, financing and legal obligations with utility service providers, affordable housing negotiations with a local affordable housing provider as well as contractor availability); the site would be brought forward by Abbey Homes Limited, likely phased over a period of 1-2 years following the grant of planning permission.
- 13.1.2 It is also noted that there is a high demand for affordable housing in the region which could be supported either as part of the main development or phased dependent of the local affordable housing providers preferences (and any negotiated unit type).

14.0 Community Consultation, Benefit and Safety

- 14.1.1 The site offers the unique opportunity to bring forward the site to provide much needed housing in the area. The development of the site would not result in the loss of any community facilities nor public green-space. Further provisions for public open space could also be provided on site to the benefit of the wider community and local ecology.
- 14.1.2 At this stage no formal community consultation has been undertaken, however some of the neighbouring land-owners are aware that the applicants are proposing that the lands be put forward as a candidate site (following earlier on site surveys, informing this report). This would also follow on from the earlier 2014 planning application whereby local residents would have been notified of the developer's intentions to bring forward the site.
- 14.1.3 Community safety forms also an important consideration when developing any site. The proposed development will have little impact on community safety, due to the type of development proposed and taking into consideration the location of the proposed development. Located within a self-contained field, the site can be easily secured to prevent any unauthorised access during any construction phase.

15.0 Summary

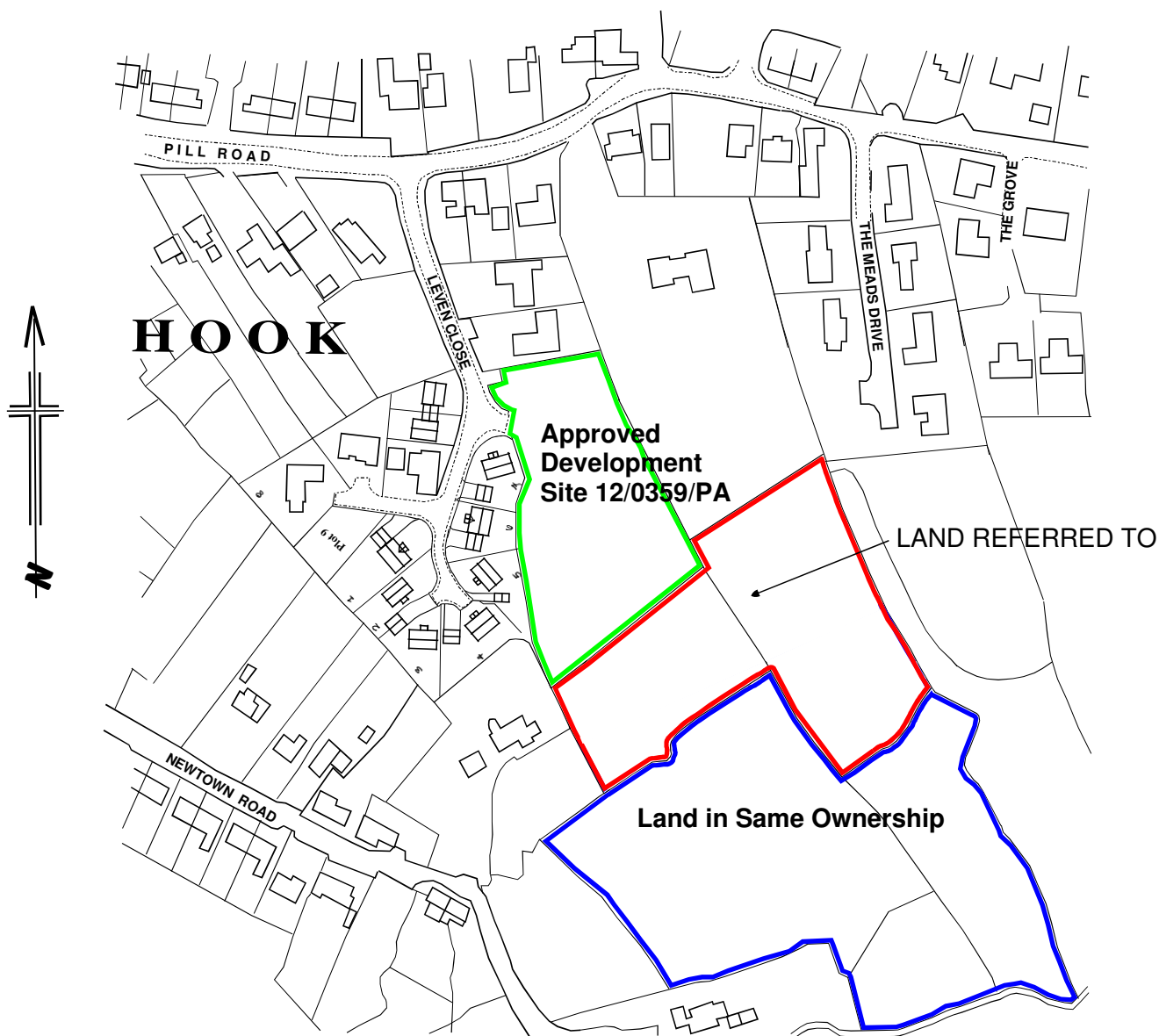
15.1.1 The proposed candidate site is considered to be compliant with local and national level policy that supports development within sustainable communities. The current Pembrokeshire LDP notes a variety of policies in general and specific terms, of relevance to the proposed candidate site. The Council's electronic mapping system currently identifies the site (fig 5) as falling within open countryside. However located adjacent to the existing built form within a Sustainable Village; the proposed candidate site forms a logical extension to the village boundary.

15.1.2 The key candidate site characteristics are noted as follows,

- Level topography on site;
- Electrical and sewage connections are available on site;
- Clear opportunities to link into upgraded sustainable drainage systems on site;
- High demand for properties in the area, both home owner and affordable housing;
- No protected historical structures known on site;
- No known environmental designations on site that would limit the site coming forward;
- No flood risk on site.
- Good public transport and services within main village.

15.1.2 At Atriarc we value engagement on all of our planning submissions. Further information can be developed and if needed clarified as the candidate site process progresses through each assessment stage. For clarification or to discuss any requirements regarding this proposal please contact Wayne Reynolds on 07855 656586 or via wayne@atriarcgroup.com

Appendix A – Architects Plans and drainage lines within adjacent site
(to the north of the proposed candidate site)



Location Plan 1:2500

title

Location Plan

client

***Abbey Homes Ltd, 70 Haven Rd
Haverfordwest, Pembs. SA61 1DX***

project

***Additional Plots off Leven Close,
Pill Road, Hook SA62 4LF***

Nicholas Hall

Architectural Consultant

Siriole, Wolfscastle, Pembs. SA62 5LZ

01437 741658 nicholas-hall@hotmail.co.uk

date

Feb. 2015

dwg. no.

HK1114/Location Plan

Work to figured dimensions in preference to scaling
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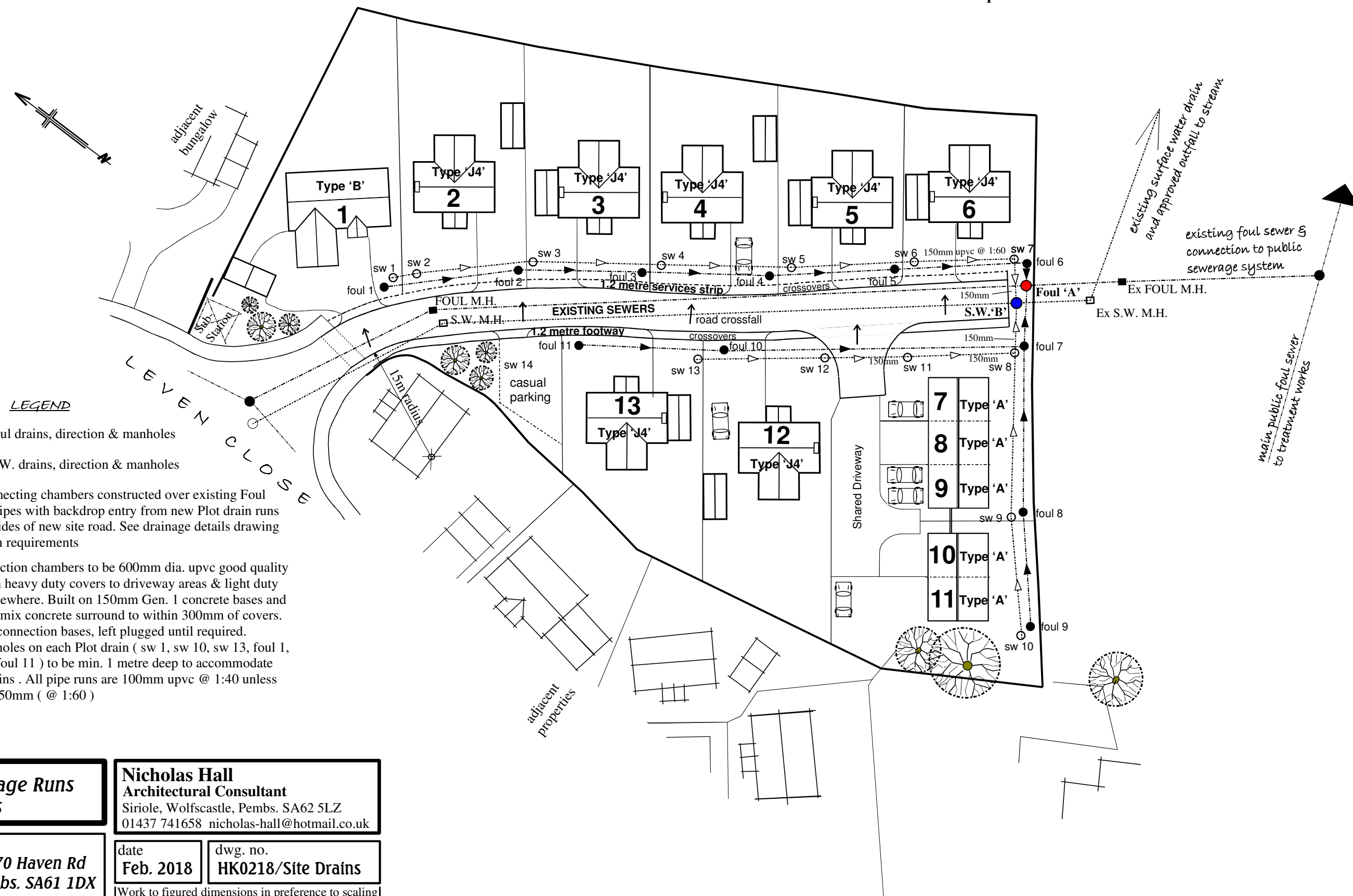
scales

1:2500

NOTE

Property sizes, shapes & positions are provisional and may change.

Refer to Site Owner for Plot inspection chamber requirements



LEGEND

new foul drains, direction & manholes

new S.W. drains, direction & manholes

Foul 'A' deep connecting chambers constructed over existing Foul & S.W. pipes with backdrop entry from new Plot drain runs on both sides of new site road. See drainage details drawing for design requirements

Note : Plot inspection chambers to be 600mm dia. upvc good quality rings with heavy duty covers to driveway areas & light duty covers elsewhere. Built on 150mm Gen. 1 concrete bases and with lean mix concrete surround to within 300mm of covers. Multiple connection bases, left plugged until required. First manholes on each Plot drain (sw 1, sw 10, sw 13, foul 1, foul 9, & foul 11) to be min. 1 metre deep to accommodate House drains . All pipe runs are 100mm upvc @ 1:40 unless noted as 150mm (@ 1:60)

title
On-Site Drainage Runs Through Plots

client
**Abbey Homes Ltd, 70 Haven Rd
Haverfordwest, Pembs. SA61 1DX**

project
**New House - Plot 6, Leven Close
Phase 2, Hook, Pembs. SA62 4LF**

Nicholas Hall
Architectural Consultant
Siriole, Wolfscastle, Pembs. SA62 5LZ
01437 741658 nicholas-hall@hotmail.co.uk

date
Feb. 2018

dwg. no.
HK0218/Site Drains

Work to figured dimensions in preference to scaling
Scaling can cause errors due to paper movement.
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scales
1:500

Site Layout Plan 1:500

Appendix B – Dwr Cymru/ Welsh Water working area plan for associated drainage upgrades

For further information on this report please contact:

Wayne Reynolds
BSc MSc MA MRTPI

Director

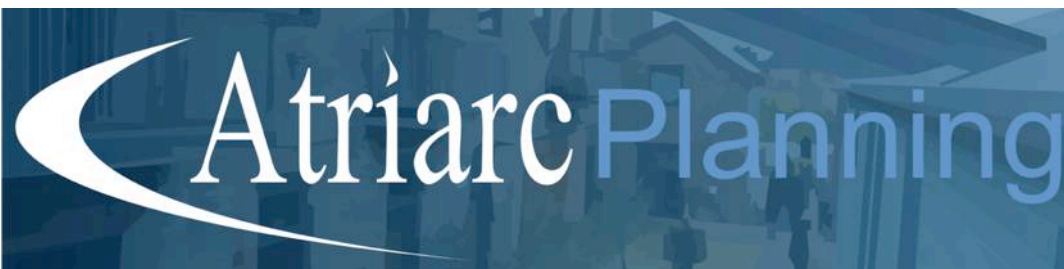
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Telephone: 01994 220667 / 07855 646586

Email: wayne@atriarcgroup.com

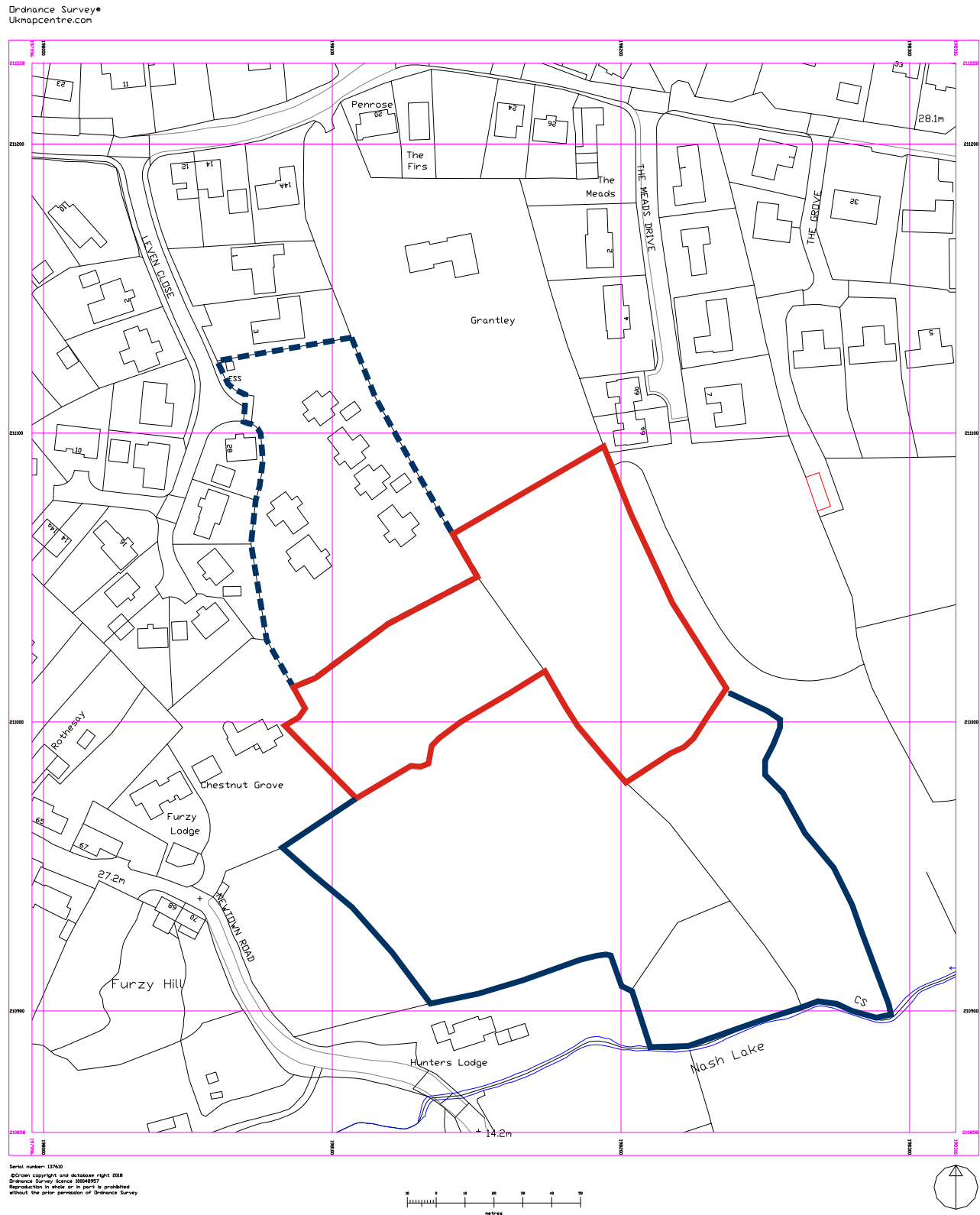
Web: www.atriarcgroup.com

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Supporting
Development
Success

Site Location details



Key

- Proposed Candidate Site
- Lands also under ownership
- Lands approved under 12/0359/PA under various stages of construction/ sale. NB Applicant currently retains ownership of highways lands and miscellaneous infrastructure. Part completed site currently for sale/ sales in progress

Site parameters

Address - land adjacent to Leven Close Hook, Pembrokeshire

Total site - 0.88Ha/ 2.17Acres (red-line plan)

Grid Reference: SM 98114 11076

Grid Reference: SM 981110 (6 figure)

X (Easting): 198114
Y (Northing): 211076
Latitude: 51.761879
Longitude: -4.9269010



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Plans(s) for specified planning purposes only

This plan has been prepared as part of the Pembrokeshire Development Plan review, where the landowner is seeking a formal allocation for residential housing on site.

This plan should be viewed in conjunction with all planning, design and accompanying reports, to support the candidate site coming forward as a formal housing allocation.

NB Where applicable annotated dimensions supersedes the OS base map parameters.

TITLE Land adjacent to Leven Close, Hook, Pembrokeshire SA62 4LH	
CLIENT Abbey Homes Ltd	DATE August 2018
SCALE 1:2000 @ A3	DRG, NO 1a



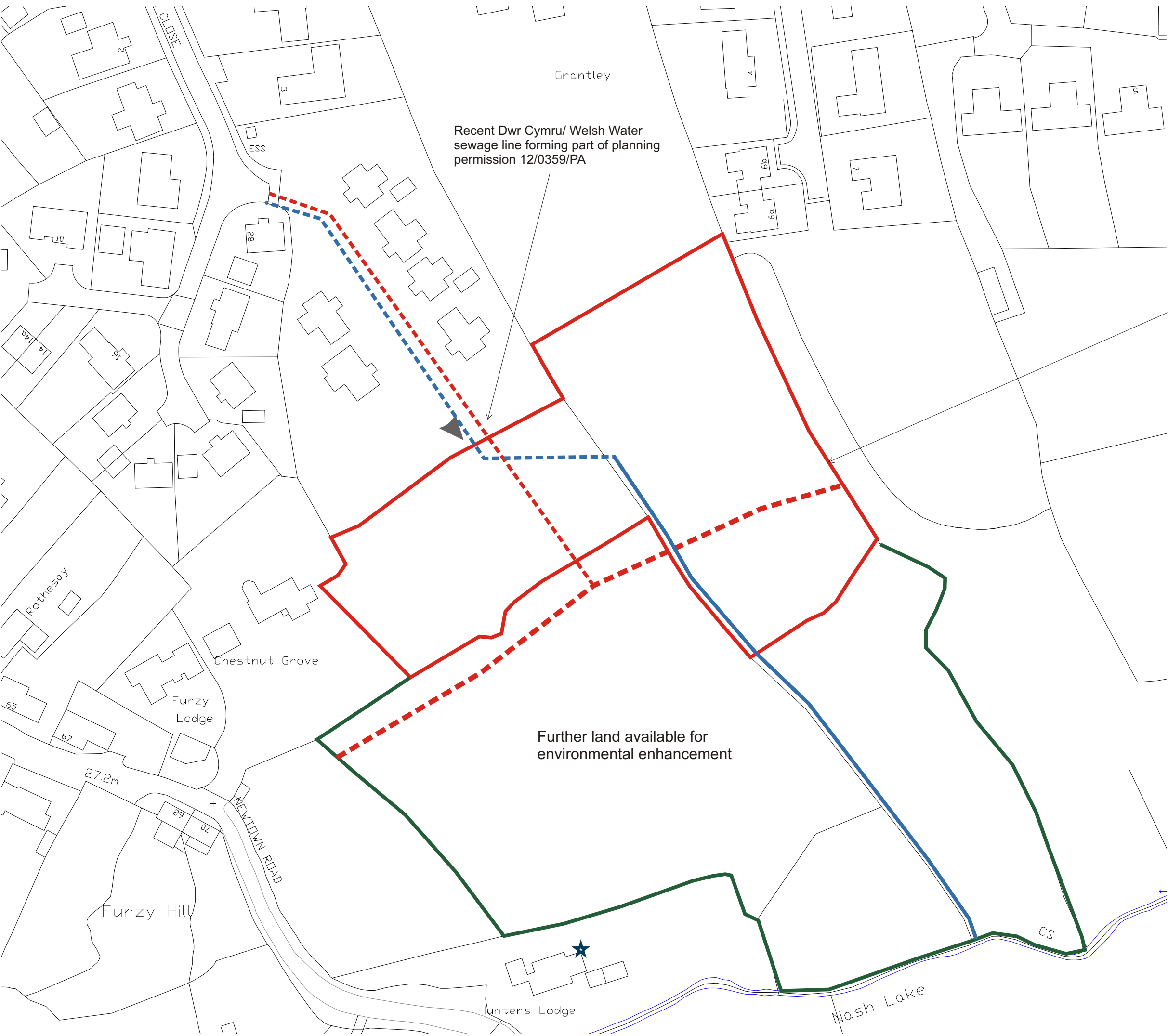
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Ordnance Survey®
Ukmapcentre.com



Main residential development site circa 0.88 Ha

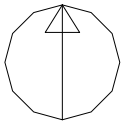
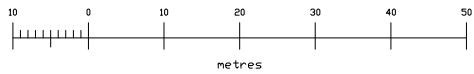
Upgraded Dwr Cymru/ Welsh Water sewage line

Further land available for environmental enhancement

Key

- Primary access (indicative)
- Primary residential development site
- Wider lands able to support village greenspace
- Potential road enhancements
- Neighbouring Historic Record (see accompanying report)
- Upgraded Dwr Cymru/ Welsh Water Sewage line
- Dwr Cymru/ Welsh Water surface water drain
- Surface water drainage ditch, outfall leading to stream to south

Serial number: 137610
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TITLE Land adjacent to Leven Close,
Hook, Pembrokeshire
SA62 4LH

CLIENT Abbey Homes Ltd

DATE August 2018

SCALE 1:1000 @ A3

DRG. NO 2a

NOTE

Property sizes, shapes & positions are provisional and may change.

Refer to Site Owner for Plot inspection chamber requirements

LEGEND

new foul drains, direction & manholes

new S.W. drains, direction & manholes

Foul 'A' deep connecting chambers constructed over existing Foul & S.W. pipes with backdrop entry from new Plot drain runs on both sides of new site road. See drainage details drawing for design requirements

S.W. 'B'

Note : Plot inspection chambers to be 600mm dia. upvc good quality rings with heavy duty covers to driveway areas & light duty covers elsewhere. Built on 150mm Gen. 1 concrete bases and with lean mix concrete surround to within 300mm of covers. Multiple connection bases, left plugged until required. First manholes on each Plot drain (sw 1, sw 10, sw 13, foul 1, foul 9, & foul 11) to be min. 1 metre deep to accommodate House drains . All pipe runs are 100mm upvc @ 1:40 unless noted as 150mm (@ 1:60)

title	On-Site Drainage Runs Through Plots		
client	Abbey Homes Ltd, 70 Haven Rd Haverfordwest, Pembs. SA61 1DX		
project	New House - Plot 6, Leven Close Phase 2, Hook, Pembs. SA62 4LF		
	Nicholas Hall Architectural Consultant Siriole, Wolfscastle, Pembs. SA62 5LZ 01437 741658 nicholas-hall@hotmail.co.uk		
	date	dwg. no.	
	Feb. 2018	HK0218/Site Drains	
	Work to figured dimensions in preference to scaling Scaling can cause errors due to paper movement. This drawing is the copyright of the designer.		
	scales	1:500	

Site Layout Plan 1:500

ECOLOGICAL APPRAISAL
LAND OFF LEVEN CLOSE, HOOK



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DISCUSSION AND MITIGATION	11

PREPARED BY JIM WALLWORK, ECOLOGIST BSc [HONS] MCIEEM

EXECUTIVE SUMMARY

- PLANeco was commissioned by Atriarc Planning & Construction to carry out an Ecological Appraisal of a c.0.9Ha whole and part-parcel to the south and east of an existing development in progress off Leven Close, Hook SA62 4LZ so as to inform Local Development Plan potential.
- The survey was carried out on 11th May 2018 by an experienced ecologist, who is a full member of the Institute of Ecology and Environmental Management.
- No statutory sites would be significantly affected by any appropriate residential dwelling proposal that incorporated a sustainable drainage system [SuDS] and appropriate green-open-spaces with retained perimeter features.
- No badgers or badger setts would be affected any appropriate proposed works.
- If trees in the south-easternmost corner are retained - together with all perimeter vegetation - no roosting features would be directly affected by any appropriate proposed development; phase 2 bat surveys should be undertaken to ascertain the value of the habitats as foraging and commuting resources as per *Bat Conservation Trust's Bat Surveys Good Practice Guidelines*. These surveys should be spread through the period April – October [one in spring, summer and autumn] and comprise a minimum of 3-visits together with seasonal remote static 3-day survey periods; work should assess the 'in-field' trees for their roosting status.
- South or west-facing building elevations should incorporate integrated bat boxes within stonework / render near to eaves and away from windows – and any other mitigation relevant to Phase 2 survey results.
- No vegetation clearance is necessary given the trees in the south-easternmost corner are retained. East or north-facing elevations should incorporate integrated bird boxes within stonework / render so as to provide further nesting opportunities.
- No vegetation clearance relevant to dormice is relevant.
- If the site – prior to clearance already undertaken – was suitable for reptiles then there is a possibility that the small remaining grassed area might harbour individual reptiles. A further survey to confirm likely absence of reptiles should be undertaken. This would involve the deployment of refugia [mats and / or tins] to be checked on seven occasions in suitable weather conditions. This assessment should follow guidelines set out in the *Herpetofauna Workers Manual* [JNCC, Gent and Gibson 1998].
- Phase 2 surveys will better inform the value of the remaining habitats and appropriate mitigation; any development should retain and enhance its perimeter boundaries and seek opportunities to incorporate ecologically valuable green-open-spaces. No external lighting should form part of the development.

INTRODUCTION

PLANeco was commissioned by Atriarc Planning & Construction to carry out an Ecological Appraisal of a c.0.9Ha whole and part-parcel to the south and east of an existing development in progress off Leven Close, Hook SA62 4LZ so as to inform Local Development Plan potential.

The survey was carried out on 11th May 2018 by an experienced ecologist, who is a full member of the Institute of Ecology and Environmental Management.

Survey results will be passed to the county biological records centre in order to augment their records for the area.

SITE DESCRIPTION

The survey area comprised a whole and part-parcel to the south and east of an existing development off Leven Close that had previously been cleared of vegetation and levelled; a central ditch part divided the parcels. In-field ash standards were situated in the south-easternmost field corner; spoil from levelling had part-buried other oak standards that formed this woodland edge to the site - at Ordnance Survey Grid Reference SM981811103.



Figure 1 & 2. Site viewed from south-westernmost corner [left] and central habitats



Figure 3 & 4. Site viewed from easternmost boundary [left] and westernmost habitats

The adjacent landscape comprised Leven Close and residential dwellings to the north and west; unmanaged pasture to the east; and broadleaved woodland associated with a small watercourse to the south.



Figure 5. Red-line survey area adjacent to current development

METHODOLOGY

DESK STUDY

A desktop data search to identify statutory and non-statutory designated sites and records of protected species within 1km of the site was carried out using the National Biodiversity Network [NBN] gateway website and the government's MAGIC Nature on the Map website. Aerial photographs were also interpreted.

HABITAT

Phase 1 habitat types were noted and mapped where necessary using the standard methodology published by the Nature Conservancy Council in 1990 [reprinted by JNCC in 1993].

BADGERS

A search was made within and adjacent to the site for signs of badgers, comprising:

- setts [comprising either single isolated holes or a series of holes].
- faeces [usually deposited in characteristic excavated pits].
- paths [between setts or leading to feeding areas].
- snuffle holes [small scrapes where badgers have foraged].
- day nests [vegetation where badgers may sleep above ground].

BATS

Any potentially suitable trees and / or structures within and adjacent to the site were inspected using binoculars and a powerful torch. External signs of occupation by bats including urine staining, fur rubbing and droppings were noted together with suitable crevices. Habitats were also assessed for their foraging and commuting value.

DORMICE

The hedgebanks were assessed for their suitability as dormouse habitat.

BIRDS

The habitats were assessed for their breeding bird suitability.

REPTILES

The habitats were assessed for their potential to support a reptile population.

LIMITATIONS

It should be noted that this survey takes no account of seasonal differences and a lack of signs of any particular species does not confirm its absence, merely that there was no indication of its presence at the time of survey. If no action or development of this land takes place within twelve months of the survey then the findings of this survey will no longer be considered reliable and should be repeated.

RESULTS

DESK STUDY

Pembrokeshire Marine Special Area of Conservation [SAC] and Milford Haven Waterway Site of Special Scientific Interest [SSSI] were situated c.560m to the east and C.760m to the north; Hook Wood SSSI was c.660m to the north.

Hook Wood SSSI is an ancient estuarine woodland of sessile oak *Quercus petraea* clothing the steep outer banks of a major meander of the Western Cleddau estuary. It has numerous ancient woodland indicator plants among the 130 higher plants recorded, and is one of the most diverse of the oakwoods that characterise the steeper rocky shorelines of Milford Haven.

Milford Haven Waterway SSSI and Pembrokeshire Marine SAC is of special interest for its geology, ancient woodland, marine biology, saltmarsh, swamp, saline lagoons, rare and scarce plants and invertebrates, nationally important numbers of migratory waterfowl, greater and lesser horseshoe bats *Rhinolophus ferrumequinum* and *R. hipposideros* and otter *Lutra lutra*.

Species records included badger *Meles meles*, hedgehog *Erinaceus europaeus*, fieldfare *Turdus philomelos* and slow worm *Anguis fragilis*,

HABITATS

The survey area comprised dominant bare earth resulting from previous vegetation clearance; occasional established ground flora included soft rush *Juncus effusus*, emerging willowherb *Epilobium* sp., bindweed *Convolvulus arvensis*, silverweed *Potentilla anserina*, cleavers *Galium aparine*, campion *Silene dioica*, nettle *Urtica dioica* and dock *Rumex obtusifolius*.

The southernmost BOUNDARY was scrub and woodland edge; to the west hawthorn *Crataegus monogyna*, blackthorn *Prunus spinosa*, bramble *Rubus fruticosus*, buddleia *Buddleja davidii*, holly *Ilex aquifolium*, gorse *Ulex europaeus*, honeysuckle *Lonicera periclymenum* and *Salix* sp. were prevalent; ground flora included campion, nettle, ground elder *Aegopodium podagraria*, willowherb, male fern *Dryopteris filix-mas*, hemlock waterdropwort *Oenanthe crocata*, male fern and nettle. To the east more standards were present; of ash *Fraxinus excelsior* and oak *Quercus* sp. with hawthorn, holly and bramble open understorey.

Ground flora included hart's-tongue fern *Asplenium scolopendrium*, celandine *Ranunculus ficaria*, male fern, herb-Robert, bluebell *Hyacinthoides non-scripta*. Soil from the cleared area had been pushed into the south-easternmost woodland habitat; concrete slab, rubble and bricks formed part of the spoil that had been reseeded. Individual ash and oak standards - some part-buried - formed part of this levelled ground 'site edge'.

The easternmost BOUNDARY comprised a species-rich low hedgebank of *Salix* sp., hawthorn, blackthorn, *Rosa* sp., *Prunus* sp., holly and oak; the northernmost BOUNDARY was made-up of hawthorn, gorse, holly, *Rosa* sp., blackthorn, *Salix* sp. and ash with a *Ilex* section at the western end. Ground flora included male fern, hart's-tongue fern and campion; associated shallow dry ditches have either been created and / or retained as part of site levelling / clearance.

A small [c.40m²] area remained grassed; species included meadowsweet *Filipendula ulmaria*, mint *Mentha aquatica*, marsh thistle *Cirsium palustre*, fleabane *Pulicaria dysenterica*, greater bird's-foot trefoil *Lotus pedunculatus* and hemlock water-dropwort.

A central ditch had bare earth banks and slow, turbid running water.

BADGERS

No setts or signs of badger were found on or immediately adjacent to the site

BATS

Perimeter in-field trees in the south-easternmost corner that formed part of boundary habitats had significant roosting potential; mature ivy, dead wood, woodpecker holes, knot holes and crossing branches were present.

Some dead wood was present on a Salix standard and an oak with a broken branch formed part of the easternmost boundary hedgebank; no signs were associated with either feature.

Trees that formed perimeter hedgebank features will be retained; the area of cleared vegetation abutted woodland habitat that included a watercourse to the south and could have been relevant to foraging and / or commuting bats. Edge habitats might still provide a resource relevant to these bats.

BIRDS

Perimeter vegetation provided suitable bird breeding habitat; these features will be retained.

DORMICE

Perimeter hedgebank vegetation provided potentially suitable dormouse habitat that connected to wider contiguous suitable vegetation; these features will be retained.

REPTILES

Very little suitable sward suitable for reptiles was present; previous vegetation clearance meant that only a small isolated grassed area used for storage of building materials was left.

LEGISLATION AND SPECIES INFORMATION

BATS

All 17 species of bat known to breed in England and Wales, and their roost sites, are protected under the Conservation of Habitats and Species Regulations 2010 (as amended), known as the 'Habitats Regulations'. This makes it an offence to deliberately kill or injure a bat, or to deliberately disturb a bat such that its ability to hibernate, breed or rear young, or such that the species' distribution, were significantly affected. It is also an offence to damage or destroy any breeding site or resting place. Intentional or reckless disturbance of bats in their resting places, and damage to or obstruction of resting places are also offences under the Wildlife and Countryside Act 1981 (as amended). Under UK law a bat roost is "any structure or place which any wild [bat]...uses for shelter or protection". As bats tend to reuse the same roosts, legal opinion is that the roost is protected whether or not the bats are present at the time. As a result, development works which are likely to involve the loss of or alteration to roost sites, or which could result in killing of or injury to bats, need to take place under licence. Works which could disturb bats may also be licensable, though this needs to be assessed on a case by case basis, as bats' sensitivity to disturbance varies depending on normal background levels, and the definition of disturbance offences under the Habitats Regulations is complex. In practice this means that works involving modification or loss of roosts (typically in buildings, trees or underground sites) or significant disturbance to bats in roosts are likely to be licensable. Licences can be obtained from Natural England or the Welsh Government to permit works that would otherwise be illegal, provided it can be demonstrated that the proposed works are needed to protect public health or safety, or for other reasons of overriding public interest including social and economic reasons. It is also necessary to demonstrate that there is no satisfactory alternative to the proposed works, and that the conservation status of bats in the area will be maintained. Appropriate mitigation and post-construction monitoring are therefore a requirement of all licences.

BIRDS

All British birds, their nests and eggs (with certain exceptions) are protected under the Wildlife & Countryside Act 1981 (as amended) which makes it an offence to: intentionally kill, injure or take a wild bird; intentionally take, damage or destroy nests which are in use or being built; intentionally take or destroy birds' eggs; or possess live or dead wild birds or eggs. A number of species receive additional protection through inclusion on Schedule 1 of the Wildlife and Countryside Act. Penalties for offences against bird species include fines of up to £5,000 and/or up to six months in prison.

General licences for control of some bird species are issued by Natural England and Natural Resources Wales in order to prevent damage or disease, or to preserve public health or public safety, but it is not possible to obtain a licence for control of birds or removal of eggs/nests for development purposes. Consequently if nesting

birds are present on a development site when works are programmed to start it is usually necessary to delay works, at least in the areas supporting nests, until any chicks have fledged and left the nest.

REPTILES

All six native reptile species receive protection under the Wildlife and Countryside Act 1981 (as amended). The four more common species (common lizard *Zootoca vivipara*, slow-worm *Anguis fragilis*, adder *Vipera berus* and grass snake *Natrix natrix*) receive partial protection which makes it an offence to intentionally kill or injure a reptile. The two other reptile species (smooth snake *Coronella austriaca* and sand lizard *Lacerta agilis*), both of which are rare with very restricted UK ranges receive full protection under the Conservation of Habitats and Species Regulations 2010 (as amended). Penalties for offences against reptile species include fines of up to £5,000 and/or up to six months in prison.

Works such as site clearance or topsoil stripping which could result in killing or injury of reptiles could be considered an offence unless measures are taken to minimise the risk of this occurring. In practice, mitigation for impacts of development on common reptiles generally comprise one or more of the following techniques: displacement, in which reptiles are encouraged to move to suitable retained habitat by changing the management of areas affected by development; exclusion, where reptile-resistant fencing is provided between a development site and suitable retained habitat allowing reptiles to be trapped from the development footprint and released elsewhere on the site; and translocation, where animals are trapped from a development site and released on another suitable site nearby. Reptile mitigation proposals, particularly those involving translocation of animals, should be agreed in advance with the local planning authority.

DORMICE

The dormouse is fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 [as amended] and is also a European protected species under the Conservation of Habitats and Species Regulations 2010 (as amended), known as the 'Habitats Regulations' which makes it an offence to intentionally or deliberately disturb, injure or kill a dormouse or damage or destroy any breeding site or resting place. Furthermore it is a priority species in the UK Biodiversity Action Plan (BAP). A licence is required under this legislation in order to carry out habitat management and also if dormouse habitat is destroyed for the purposes of development.

DISCUSSION AND MITIGATION

DESK STUDY

No statutory sites would be significantly affected by any appropriate residential dwelling proposal that incorporated a sustainable drainage system [SuDS].

BADGERS

No badgers or badger setts would be affected any appropriate proposed works.

BATS

If trees in the south-easternmost corner are retained - together with all perimeter vegetation - no roosting features would be directly affected by any appropriate proposed development; phase 2 bat surveys should be undertaken to ascertain the value of the habitats as foraging and commuting resources as per *Bat Conservation Trust's Bat Surveys Good Practice Guidelines*. These surveys should be spread through the period April – October [one in spring, summer and autumn] and comprise a minimum of 3-visits together with seasonal remote static 3-day survey periods; work should assess the 'in-field' trees for their roosting status.

South or west-facing building elevations should incorporate integrated bat boxes within stonework / render near to eaves and away from windows – and any other mitigation relevant to Phase 2 survey results.

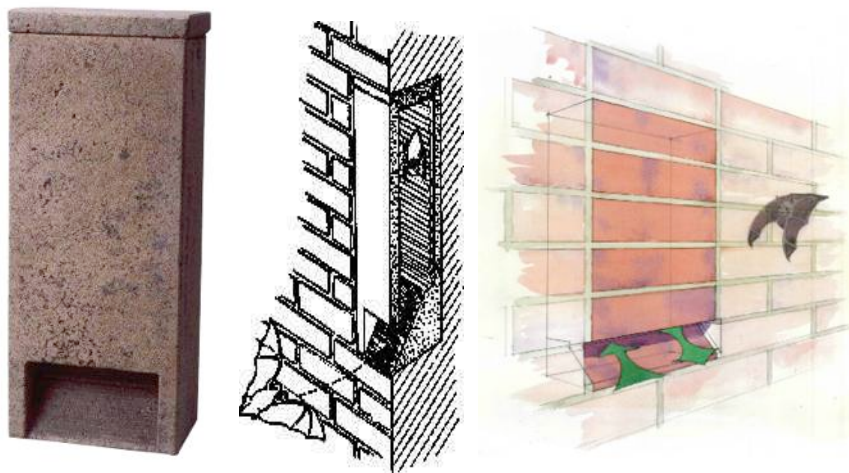


Figure 6. Indicative Schwegler and Habibat bat features

BIRDS

No vegetation clearance is necessary given the trees in the south-easternmost corner are retained.

East or north-facing elevations should incorporate integrated bird boxes within stonework / render so as to provide further nesting opportunities.

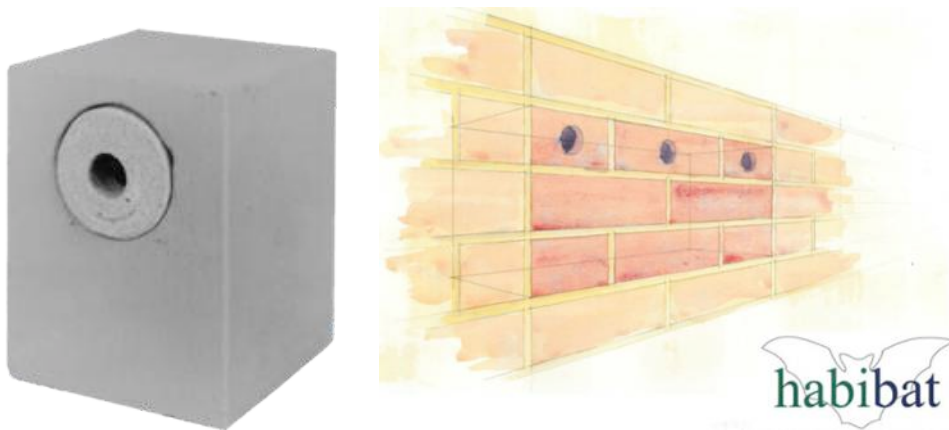


Figure 7. Indicative Schwegler and Habibat bird features

DORMICE

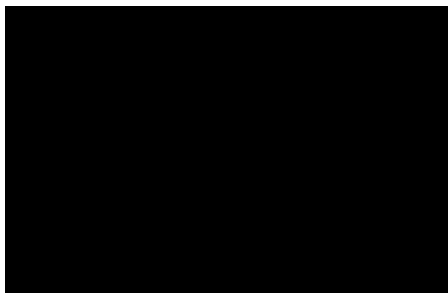
No vegetation clearance relevant to this species is relevant.

REPTILES

If the site – prior to clearance already undertaken – was suitable for reptiles then there is a possibility that the small remaining grassed area might harbour individual reptiles. A further survey to confirm likely absence of reptiles should be undertaken. This would involve the deployment of refugia [mats and / or tins] to be checked on seven occasions in suitable weather conditions. This assessment should follow guidelines set out in the *Herpetofauna Workers Manual* [JNCC, Gent and Gibson 1998].

HABITATS

Phase 2 surveys will better inform the value of the remaining habitats and appropriate mitigation; any development should retain and enhance its perimeter boundaries and seek opportunities to incorporate ecologically valuable green-open-spaces. No external lighting should form part of the development.



**Ffurflen Sylwadau Cam Adneuo'r
Cynllun Datblygu Lleol****Deposit LDP Representations Form**

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>.

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>

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

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

Mae'n rhaid derbyn eich sylwadau erbyn 16:30pm 18 Mawrth 2020. Dychwelwch ffurflenni at: ldp@pembrokeshire.gov.uk neu Y Tîm Cynlluniau Datblygu, Neuadd y Sir, Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

Your representations must be received by 16:30pm 18 March 2020. 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	Abbey Homes Limited	Wayne Reynolds
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)	NA	Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	Abbey Homes Limited	Atriarc Planning
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)		
Dyddiad	12.03.20	

Ffurflen Sylwadau Cam Adneuo'r
Cynllun Datblygu Lleol

Deposit LDP Representations Form

Date		
RHAN B: Eich sylw PART B: Your representation		
Eich enw / sefydliad Your name / organisation	Atriarc Planning representation on behalf of, Abbey Homes Limited	
1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau? 1. Which part(s) of the Plan (or supporting documents) are you commenting on?		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	Candidate site reference number 268	
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	Applicable policies GN11, GN14 and GN15	
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	Hook LDP insert map (page 48)	
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.	*	
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?		

**Ffurflen Sylwadau Cam Adneuo'r
Cynllun Datblygu Lleol****Deposit LDP Representations Form***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

Revise
settlement
boundary to
include
candidate site*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

Abbey Homes Limited, Land adjacent to Leven Close, Hook,
Pembrokeshire, SA62 4LF*Cyfeiriad y cais*

Site reference

Candidate site reference no. 268

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*

**Ffurflen Sylwadau Cam Adneuo'r
Cynllun Datblygu Lleol****Deposit LDP Representations Form**

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.

Following a review of the deposit LDP, I consider that the allocation reference candidate site 268, (Land at Leven Close, Hook) has not been fully assessed in accordance with the submitted details. The Council's feedback in relation to the site raised an objection on highways grounds. However, this has not been substantiated. A meeting was held on the 26th February 2020, with the planning policy and highway's officer. The objection to the allocation was based on a single query relating to the ownership of the access road leading to the site and the ownership status of the access road (in general). The planning officer also noted that the density of development was low in comparison to the "standard" 30 dwellings per hectare (DPH) build rate - commonly referenced in current national planning policy. However, this observation did not form part of the Council's initial rejection of the site.

As noted in our original submission, reference plan 1a (re-attached as a pdf and noted in fig1); Abbey Homes Limited (AHL) currently own the lands queried by the Highway officer, hence the provision of highways access to the candidate site is not questionable. Fig 2 (below) shows the ownership extents of AHL (reference the red boundary line). Whilst this access road is currently private, it is noted that the adjoining development is still under construction (hence the road remains private as well as lands either side of the access road). The road has been built to highway standard but not yet formally adopted, as the current scheme is still under construction. Services are however in situ (to be completed). In relation to the adjacent lands/ scheme currently under construction; the following unit (dwelling) references (identified in fig 2) are noted,

- Completed dwellings, plots 2, 3, 4, 5, 12 and 13;
- Under construction, plots 7, 8, 9, 10 and 11; and,
- To be commenced, plots 1 and 6.

Plots 1 and 6 have since been sold as serviced plots, to self-builders.

In relation to ownership of the access road and footpaths; notwithstanding the under construction properties, AHL retains the ownership of the main access road as well as a 1.2m strip of land, currently referenced as a service strip within fig 2 (on the eastern side of the access road) and a 1.2m strip of land, currently referenced as the pedestrian pathway (on the western side of the access road). An updated ownership plan is provided detailing the ownership extents (fig 2). Prior to completion of the existing development site, the new pedestrian pathways would be completed

**Ffurflen Sylwadau Cam Adneuo'r
Cynllun Datblygu Lleol****Deposit LDP Representations Form**

and the access road would be made available for adoption. As such, the highway objection is not founded on a sound basis. Subject to this clarification, the highway officer raised no objection to the proposed development.



Fig 1 (also attached as a pdf) referencing land under the ownership of Abbey Homes Limited

Fig 2 Plot references (completion and under construction) Abbey Homes Limited as well as ownership of service strips and pedestrian footpaths on site. Not to scale.

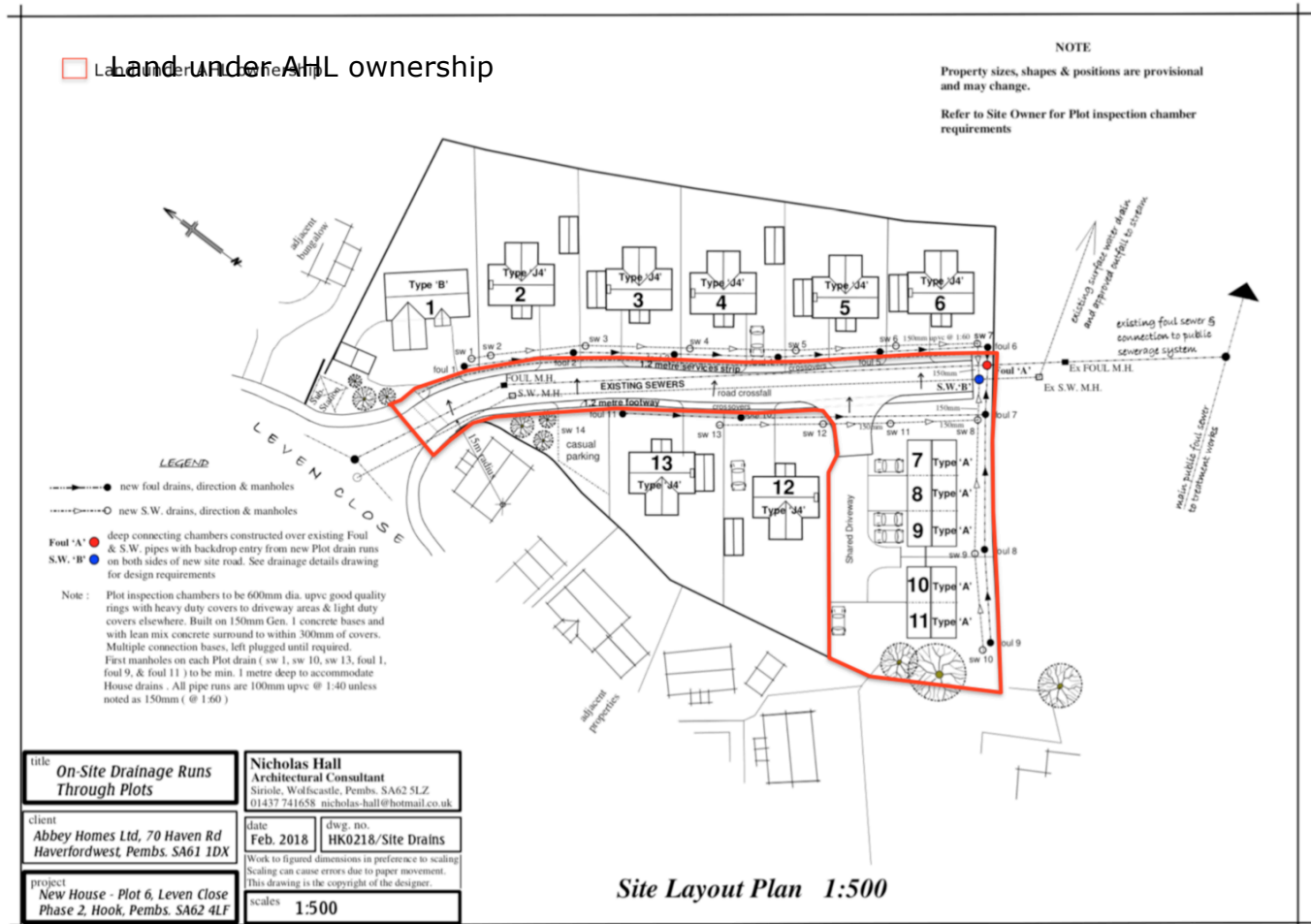


Fig 2 AHL Plot references, completions and under construction (also attached as pdf). Please note AHL ownership of main access road and pedestrian footpaths (to be completed).

The highway officer raised no objection to the proposed candidate site in terms of the proposed density (and associated traffic accessing the existing site and/ or candidate site). The provision of 7 new plots on the candidate site is therefore supported in Highways terms. As noted in our initial submission; paragraphs 3.6 and 3.7 of the submission also note,

3.6 The developer's preferences would be to develop a low-density scheme on site, creating large, detached executive homes. The existing/ under development site (to the north of the proposed candidate site) retains a planning permission for the construction for 13 dwellings on site. Within the former JUDP; the JUDP noted that this site was capable of supporting 20 units on site. However when detailed planning permission was submitted, the developer reduced this number to accommodate 13 units. The reduction in density was derived from the provision of larger units on site with extended garden and garage areas. Under the more recent LDP; the site is noted as capable of supporting 15 units. This allocation is referenced in the current LDP, allocation reference HSG/044/0050 (currently under construction/ part complete). The LDP notes that a minimum of 15 units should be

developed within the 0.59Ha site, with a provision for 10% affordable housing on site.

3.7 Based on the former precedent set by the JUDP, we consider that there is a further (minimum) supply of 7 units capable of being supported on the newly proposed candidate site. This would follow the developer's preference for a low-medium density scheme. This is founded on the developer's extensive knowledge of local housing market demands, notably seeing a shortfall in the provision of high-quality executive homes in Pembrokeshire. The lower than average density is not however fixed and a higher density could easily be achieved on site. NB The presence of a main sewer line running through the site would also impact on the location and siting of any new housing - which would support a low-density scheme coming forward on site. The final density of any scheme would however be subject to a detailed site layout and also dependent on the proposed house types e.g. bungalows, two-storey semi-detached dwellings and/ or two-storey detached dwellings. All values provided are currently for guidance purposes only.

Based on the above facts, the under supply of units on the existing allocation and the removal of the highway officer objection (from the clarification of ownership); we consider that the proposed candidate site should be included in the emerging LDP. Infrastructure to support the development is already in place and can allow the development to come forward shortly after planning approval. The adjacent site under construction is nearing completion and following this AHL contractors would be ready to commence works on the proposed candidate site.

As noted above and in the prior LDP submission (and in response to the general query raised by the planning policy officer in respect of build rates/ DPH); the DPH is rate is considered appropriate given the constraints of the site, derived from the presence of the main sewer line. The presence of the main sewer line excludes a 3m buffer strip of lands, either side of the sewer from development. Based on this limitation (as well as taking into account the general highway officer comments in respect of density and access); we consider that the proposed build density is appropriate for site. A location plan detailing the main sewer line is re-presented in the attached pdf plan (reference plan 2a) and in fig 3 overleaf.

As noted in our initial submission (following the guidance of the submitted ecology report), a 5m buffer zone between the existing hedge-row and potential location of dwellings would also need to be considered (prior to the results of a formal dormouse survey). In the event no dormice were found in this buffer zone, this land could be utilised as extended garden space (dependent on the results of any future survey). However, under a precautionary principle, this buffer is currently included within the scope of the number of dwellings proposed on site. Both the excluded area and highway density constraints need to be considered when assessing the overall DPH on site.

The deposit LDP recognises DPH rates will vary across Pembrokeshire within Policy GN11, which notes,

"New homes on sites of 0.10 hectares and above will be built at a density of at least 20 dwellings per hectare, rising to at least 25 dwellings per hectare on sites in Towns. In exceptional

In terms of wider general design policy; the density of the housing proposed is also considered to be a fair response to wider design criteria, in respect of the surrounding dwelling(s), plot to dwelling size ratio. Neighbouring dwellings retain generous garden areas attached to the main residence as well as detached and attached garages. Recognising these constraints and opportunities, the proposed candidate site could provide a high standard of amenity for future occupiers, following the wider pattern of development found in the local area. The demand for high quality units in this area of Pembrokeshire is also well supported commercially.

In general conversation with the highway and planning officer (at our meeting on the 26th February 2020), all parties also noted and agreed, that the wider lands to the south of the allocation site are clearly capable of providing SUDS to serve the proposed development site (fig 3) in compliance with the recently adopted SUDS legislation.



In relation to the policies noted within the deposit LDP. The proposed allocation meets the requirements of GN11 (below), providing open market housing within the settlement, with further affordable housing contributions linked to the final assessment of any future scheme. The proposed allocation is located within a central aspect of the village, with dwellings located to the

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north, east and west. Visually, the extension of the settlement limits would have little impact on the character, wider landscape or visual amenity. Hence, the site would sit comfortably within the context of the wider settlement limits. A detailed review of these matters was previously presented in the initial allocation submission and should be reviewed in accordance with the above matters.

GN 11 Residential Development

Residential development including self-build will be permitted where the proposal is for one or more of the following:

1. Open market housing or affordable housing to meet local needs, located within the Settlement Boundary of a Main or Rural Town, Service Centre, Service Village or Local Village as defined in the settlement hierarchy;

2. Infill developments in Hamlets (in accordance with the criteria of GN.12)

3. The replacement or sub- division of an existing dwelling;

4. The conversion of an historic building to residential use; or

5. A rural enterprise worker's dwelling or One Planet development

New homes on sites of 0.10 hectares and above will be built at a density of at least 20 dwellings per hectare, rising to at least 25 dwellings per hectare on sites in Towns. In exceptional circumstances evidence of infrastructure or physical constraints may justify a lower density.

In relation to policy GN14 we would note there are no lands for development allocated for housing in Hook. Given the level of local services provided within the village (as detailed in our original submission), we consider this allocation supersedes those in the surrounding area. For example when comparing the proposed allocation against wider allocations in Llangwm or Freystrop, which retain a lower level of service provision in terms of public amenities and services.

GN 14 Residential Allocations

The following sites are allocated for residential development.

In terms of track record, the developer has a proven track record of building housing across Pembrokeshire and is committed to completing the scheme to provide high quality homes for future residents. Within the existing development, the developer has also provided off-plan serviced plots for self-builders, the value of which is recognised in the deposit LDP. Whilst the deposit LDP recognises the value from self-build plots; within policy GN14 only 11 out of 74 allocated sites note the potential for self-build options. Given the volatility in the housing market locally, large-scale sites are often slow to come forward, as compared to smaller sites (or those capable of allowing self-build options on site). As such, we consider that the LPA needs to reconsider this allocation deficiency. The provision of self-build serviced plots on site would also bring the site within the scope of policy GN15.

GN 15 Small sites target

*The small sites target for Pembrokeshire is **1568** over the plan period of 2017- 2033 (98 homes per year).*

In relation to the density query raised by the planning officer at the meeting on the 26th February 2020 (but not identified as a formal objection to the allocation of the site); the density of the proposed site has taken into account the highway constraints to ensure a suitable scheme is presented. In relation to policy GN15, it is also noted that self-build plots are typically larger than those for a medium or large development site, upon which the standard DPH is based. The standard DPH rate does not take into account wider constraints in respect of highway access or ecology and therefore flexibility in assessing development against this standard needs to be considered.

AHL also note that from former discussions with the Planning department, dating back to the former planning application (currently in progress development); officers then recognized the value of developing the proposed candidate site. The development of the current site was preceded by lengthy negotiations with Welsh Water to upgrade the drainage system serving Hook and to forward plan development options to extend the development site, to include the land within the proposed allocation. These upgrades have been completed. With all main infrastructure in-situ; the development of the allocation could come forward, in the early stages of the LDP, as compared to other local allocated sites (where major infrastructure upgrades would be required), likely delaying those sites coming forward in the short to medium term.

Based on the above facts, we respectfully request that the LPA re-consider the allocation of the site for residential housing.

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

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

*

6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer hefyd y bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol ar gyfer darparu ar gyfer y rhain sydd eisiau rhoi tystiolaeth lafar.

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

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure

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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.Subject to the
site being
allocated by
the LPA we
are happy for
our comments
to be
presented as
a written
representation*Rwyf am siarad mewn sesiwn gwrandawriad.*

I want to speak at a public hearing.

Only in the
event the site
is not
allocated.*Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad
(e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').*If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing
site at Pen y Graig' or 'The overall housing target').

Housing site at Hook, reference candidate site 268

**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.

*

Nodiadau cyfarwyddyd

Guidance notes

Caiff Cynllun Datblygu Lleol Cyngor Sir Penfro ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.

'Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:

1. Ydy'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)

2. Ydy'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)

3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)

Darperir rhagor o wybodaeth am y profion cadernid a gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.

Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.

Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio am fwy nag un newid i'r

The Pembrokeshire County Council Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

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Cynllun Datblygu Lleol**

Deposit LDP Representations Form

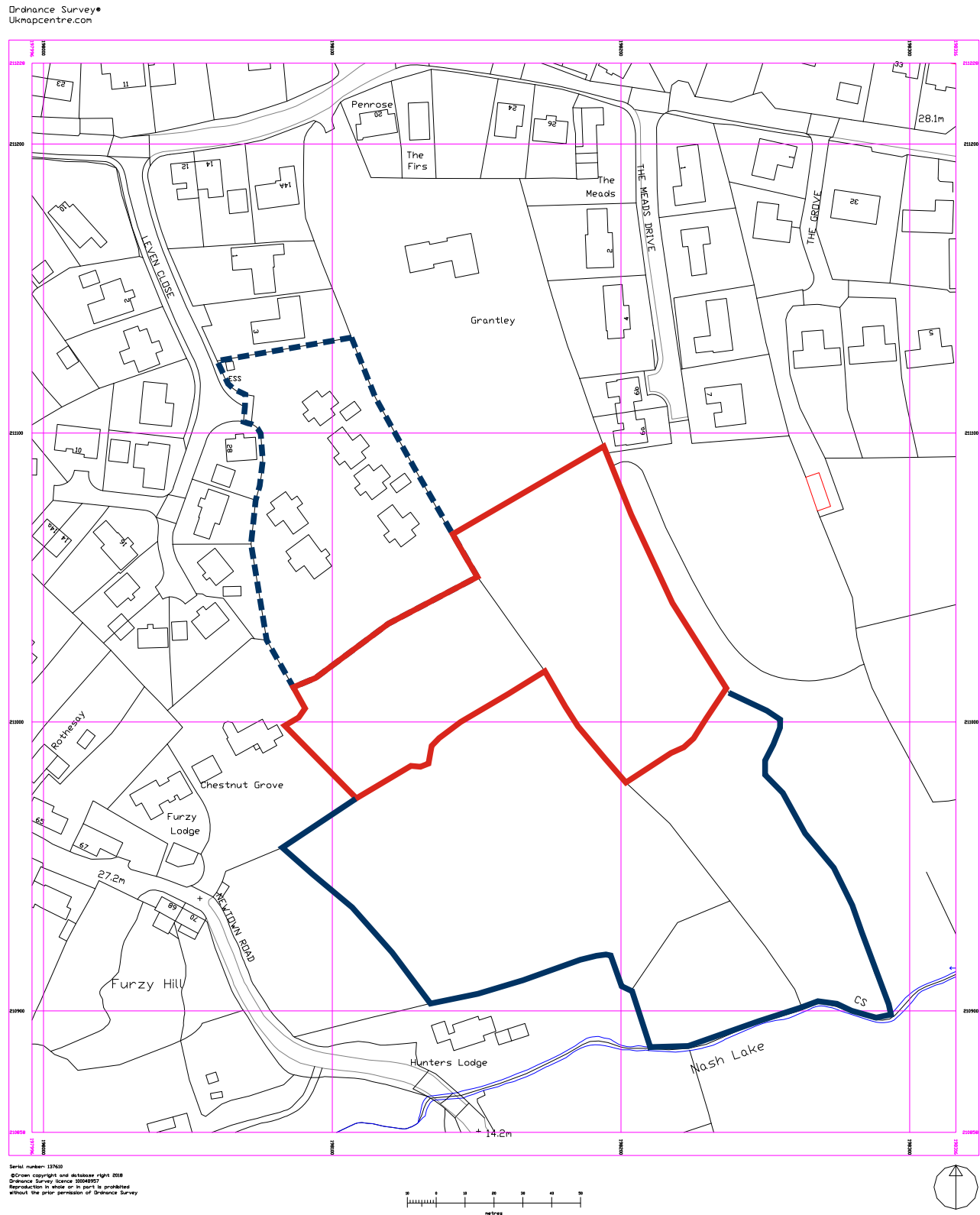
Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.

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.

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.

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.

Site Location details



Key

- Proposed Candidate Site
- Lands also under ownership
- Lands approved under 12/0359/PA under various stages of construction/ sale. NB Applicant currently retains ownership of highways lands and miscellaneous infrastructure. Part completed site currently for sale/ sales in progress

Site parameters

Address - land adjacent to Leven Close
Hook, Pembrokeshire

Total site - 0.88Ha/ 2.17Acres (red-line plan)

Grid Reference: SM 98114 11076

Grid Reference: SM 981110 (6 figure)

X (Easting): 198114
Y (Northing): 211076
Latitude: 51.761879
Longitude: -4.9269010



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This plan has been prepared as part of the Pembrokeshire Development Plan review, where the landowner is seeking a formal allocation for residential housing on site.

This plan should be viewed in conjunction with all planning, design and accompanying reports, to support the candidate site coming forward as a formal housing allocation.

NB Where applicable annotated dimensions supersedes the OS base map parameters.

TITLE Land adjacent to Leven Close, Hook, Pembrokeshire SA62 4LH	
CLIENT Abbey Homes Ltd	DATE August 2018
SCALE 1:2000 @ A3	DRG, NO 1a



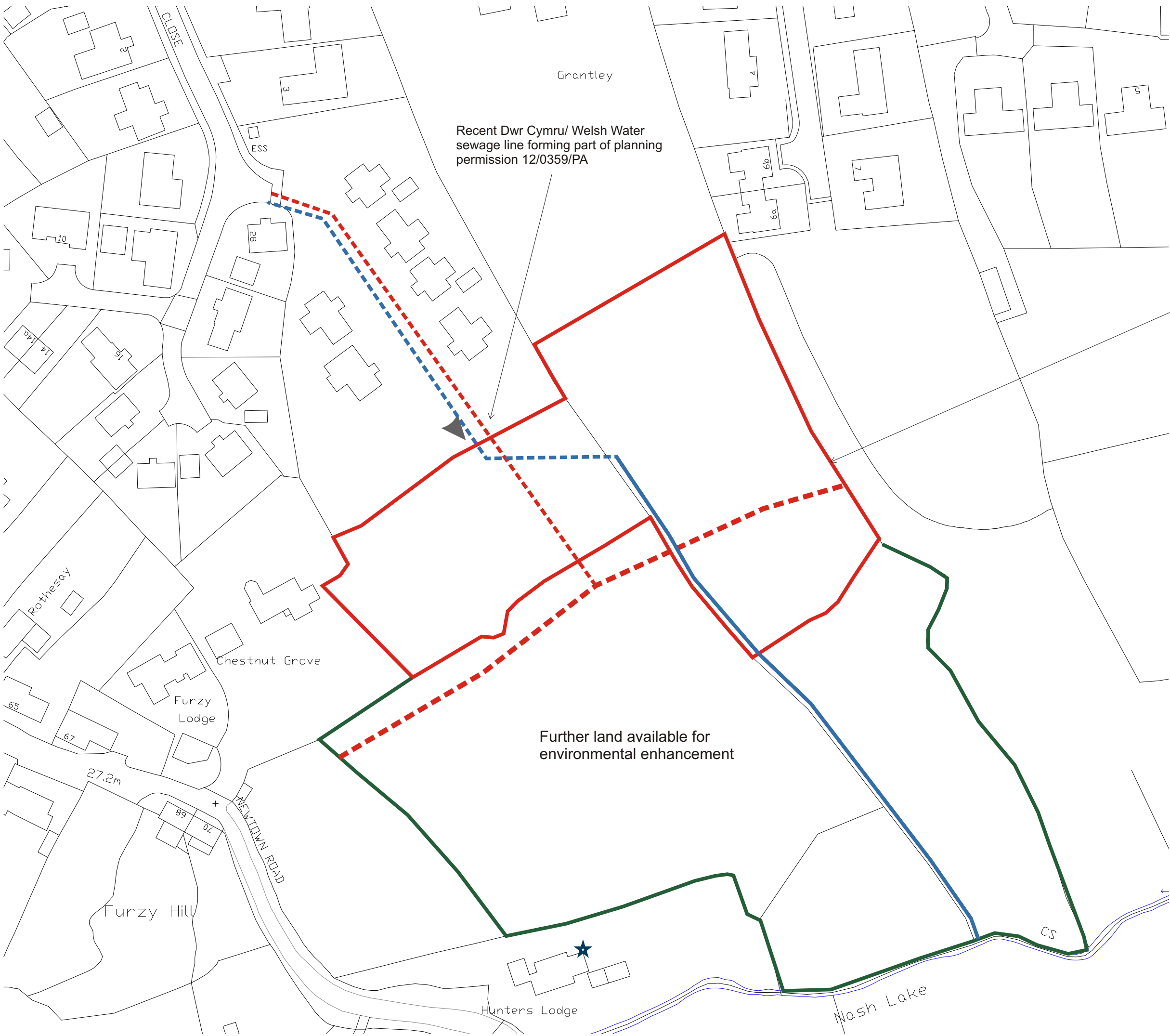
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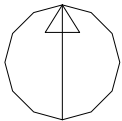
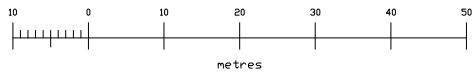
Main residential development site circa 0.88 Ha

Upgraded Dwr Cymru/ Welsh Water sewage line

Further land available for environmental enhancement

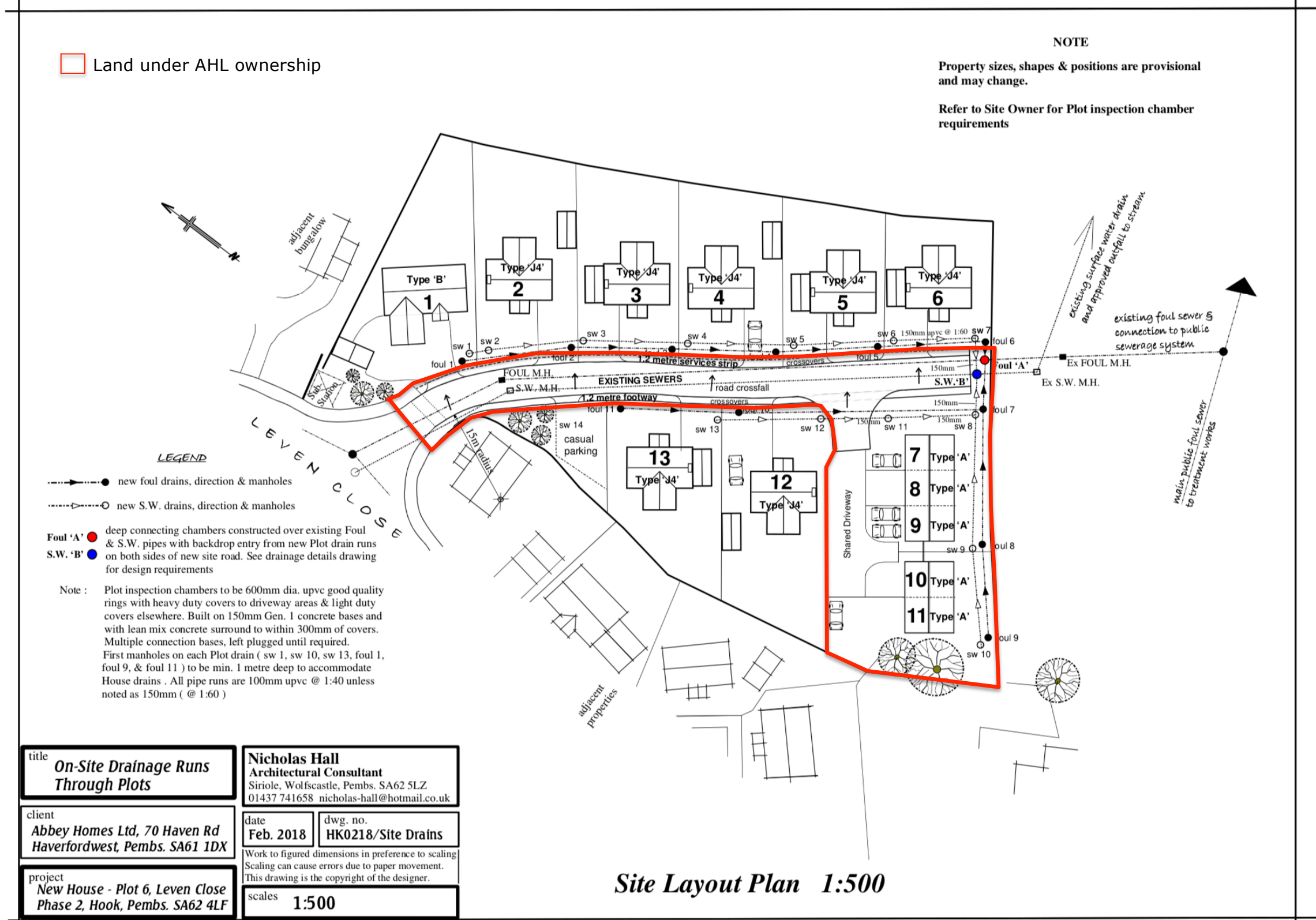
- Key
- Primary access (indicative)
 - Primary residential development site
 - Wider lands able to support village greenspace
 - Potential road enhancements
 - Neighbouring Historic Record (see accompanying report)
 - Upgraded Dwr Cymru/ Welsh Water Sewage line
 - Dwr Cymru/ Welsh Water surface water drain
 - Surface water drainage ditch, outfall leading to stream to south

Serial number: 137610
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TITLE Land adjacent to Leven Close, Hook, Pembrokeshire SA62 4LH	
CLIENT Abbey Homes Ltd	DATE August 2018
SCALE 1:1000 @ A3	DRG. NO 2a

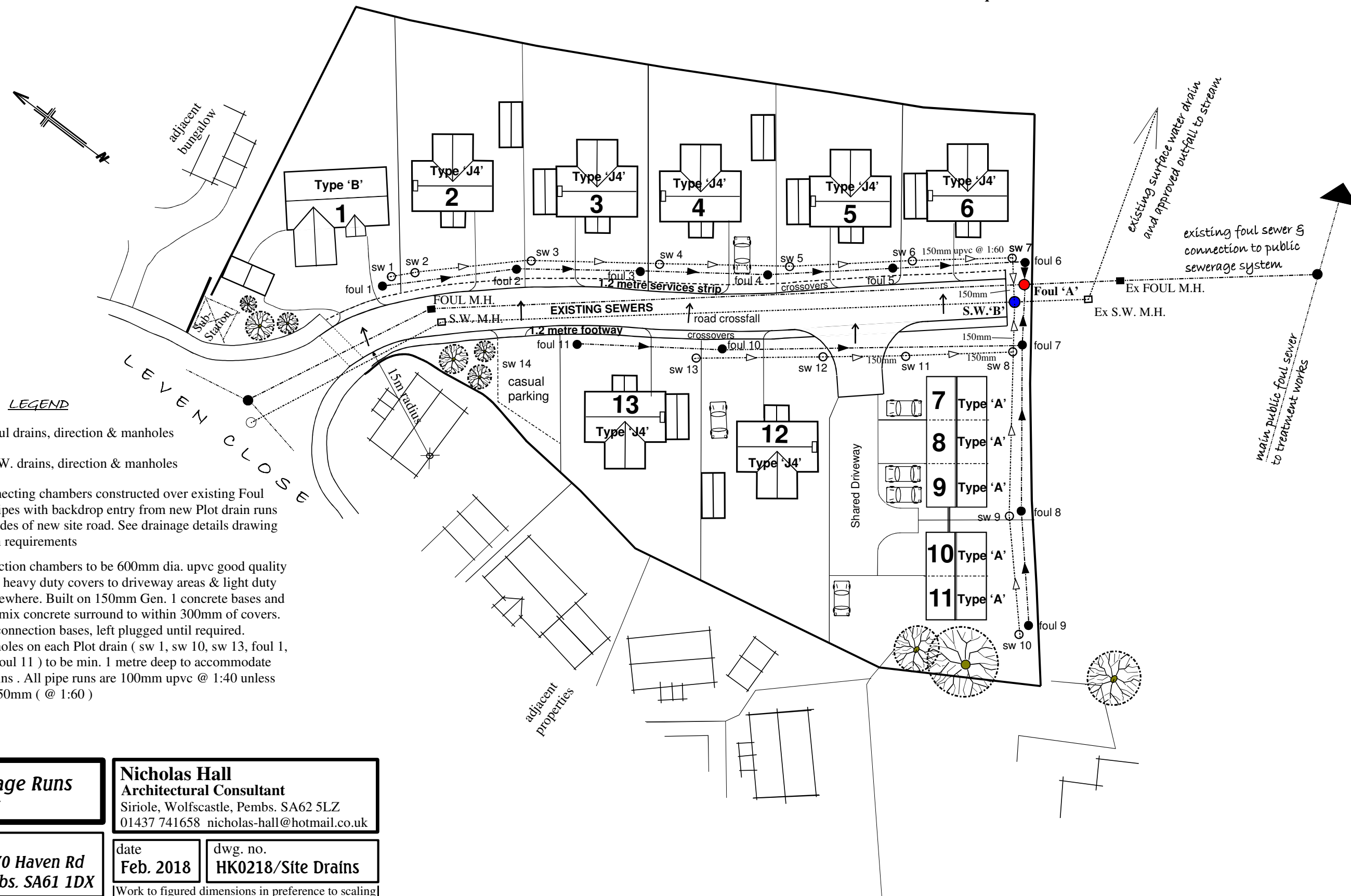
Fig 2 AHL Plot references, completions and under construction (also attached as pdf). Please note AHL ownership of main access road and pedestrian footpaths (to be completed).



NOTE

Property sizes, shapes & positions are provisional and may change.

Refer to Site Owner for Plot inspection chamber requirements



title
On-Site Drainage Runs Through Plots

client
**Abbey Homes Ltd, 70 Haven Rd
Haverfordwest, Pembs. SA61 1DX**

project
**New House - Plot 6, Leven Close
Phase 2, Hook, Pembs. SA62 4LF**

Nicholas Hall
Architectural Consultant
Siriole, Wolfscastle, Pembs. SA62 5LZ
01437 741658 nicholas-hall@hotmail.co.uk

date
Feb. 2018

dwg. no.
HK0218/Site Drains

Work to figured dimensions in preference to scaling
Scaling can cause errors due to paper movement.
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scales
1:500