

PLANNING STATEMENT AND JUSTIFICATION REPORT

MAJOR OUTLINE APPLICATION FOR ERECTION OF 54 DWELLINGS (INCLUDING AFFORDABLE ELEMENT) TOGETHER WITH VEHICULAR ACCESS (WITH ALL MATTERS RESERVED EXCEPT VEHICULAR ACCESS)

LAND NORTH OF THE KILNS, LLANGWM, HAVERFORDWEST, PEMBROKESHIRE, SA62 4HG

30th September 2021



Aerial photograph of application site (source: Google Maps 2021)



Illustrative section through site



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HAYS / 1490

Application for Planning Permission Town and Country Planning Act 1990

Mr David Popplewell
Chief Planner
Pembrokeshire County Council
County Hall
Haverfordwest
Pembrokeshire
SA61 ITP

HAYSTON DEVELOPMENTS & PLANNING LTD is making an application on behalf of Powells Rural Property Professionals Limited for the following planning permission:

1. **Proposal:** Major outline application for erection of 54 dwellings (including affordable element together with vehicular access (with all matters reserved except vehicular access))
2. **Site location:** Land North of The Kilns, Llangwm, Haverfordwest, Pembrokeshire, SA62 4HG
3. **Type of Planning Permission:** Major outline with all matters reserved except vehicular access
4. **Relevant LDP Policies:** SP1, SP.12, SP.13, SP.15, SP16, GN.1, GN.2, GN.3, GN.26, GN.27, GN.37 and GN.38
5. **Local Supplementary Planning Guidance (SPG):** Development Sites (Updated Version 2016); Biodiversity (2014); Parking Standards (June 2013); Affordable Housing (2015); Planning Obligations (2016); and Draft Landscape Character Assessment (July 2019).
6. **Relevant National Guidance:** Planning Policy Wales (PPW), Edition 11, February 2021. TAN's 2 – Planning and Affordable Housing (2006); 5 – Nature Conservation and Planning (2009); 6 – Planning for Sustainable Rural Communities (2010); 12 – Design (2016); and 18 – Transport (2007).

INTRODUCTION

1.1 Please find enclosed the following supporting information:

- **Planning Statement and Justification Report** (this document)
- **Application Form and associated certificate of ownership**
- **Drawing P01** – Location Plan - Scale A2 @ 1:2500
- **Drawing P02** – Site Survey - Scale A2 @ 1:500
- **Drawing P03** – Illustrative Site Layout Plan together with scale parameters and illustrative site section/elevations in context – Scale A1 @ 1:500 and 1:300
- **Appendix A** — **Pre-Application Letter** dated 26 January 2021 and PCC acknowledgement letter of the same date
- **Appendix B** – **Email pre-application correspondence** with Mr Mike Harris at County Highways
- **Appendix C** – **Pre-Application response letter from Welsh Water** dated 26 November 2020
- **Appendix D** – **Tree Survey Report** dated July 2021

- **Appendix E – Drainage Strategy Report** dated August 2021
- **Appendix F – Preliminary Ecological Appraisal** dated June 2021
- **Appendix G – Design & Access Statement**
- **Planning Fee – £11,860.00** (based on a site area of 2.8 ha (comprising £11,500.00 for the first 2.5 ha plus an additional £120.00 for each additional 0.1 ha).

Note: A Unilateral Agreement & Certificate of Title (*Affordable Housing Provision/Contributions and Infrastructure Contributions*) – will be submitted during the application process

1.2 The application site relates to an area of land on the north-western edge of the village of Llangwm. The site is to the north of The Kilns and east of Deerland Road with the new replacement primary school to the north and existing residential development to the east.

1.3 Outline permission is sought for the erection of up to 54 dwellings (with affordable element at 15%) on the site with access being made off a mini roundabout at the junction of The Kilns and Deerland Road. Modifications would be made to an existing field gate access to adoptable highway standards.

1.4 The site forms part of a Housing Site Allocation (reference HSG/063/00024) under Policy GN.27 of the adopted LDP1 for up to 75 dwellings. This site also included land which is now occupied by the primary school. The site has been retained as a Housing Site Allocation (reference HSG/063/LDP2/1) under Policy GN. 14 of the emerging LDP2. Therefore, the site is suitable for residential development and is included within the defined settlement boundary for Llangwm.

1.5 This report is prepared in accordance with the requirements of policies contained within the Local Development Plan for Pembrokeshire outside the National Park and incorporates Requirements for the Validation of Planning Applications (June 2010) *and Welsh Government Development Management Manual (05 May 2017)*.

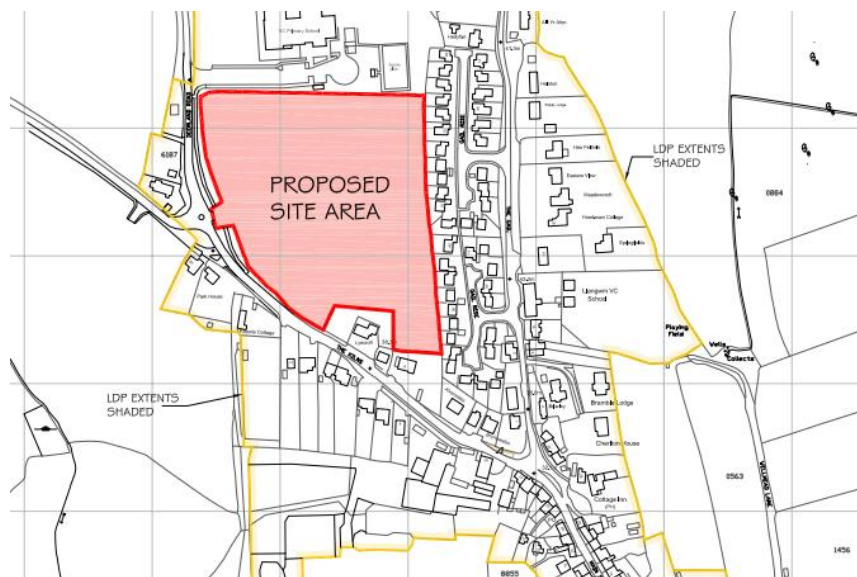
1.6 Major development is defined in Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) and includes development of 10 or more houses. The DMPWO requires pre-application consultation (PAC) to be carried out by the developer/applicant on all planning applications for 'major' development, whether for full or outline permission. Given that the application constitutes major development this planning statement has initially been prepared for the purpose of describing and justifying the proposal to inform the pre-application consultations. It also seeks clarification from the County Council on several key issues.

1.7 An updated Version 2 will be prepared post the pre-application consultation, including a report on the pre-application consultation and its responses, for submission with the planning application to the County Council. A separate Design and Access Statement will also be prepared in accordance with validation requirements.

2.0 LOCATION AND SITE DESCRIPTION

2.1 The village of Llangwm is located some 10 kms to the north-east of Neyland and some 10 kms to the south-east of Haverfordwest. A short distance to the east is the Cleddau Estuary and where the land and settlements around the Estuary fall within the adjacent administrative boundary of the Pembrokeshire Coast National Park Authority. Nearby are the rural settlements of Hill Mountain and Sardis to the south and Hook to the north.

2.2 This application site relates to undeveloped land on the north-western edge of the village of Llangwm. The site is to the north of The Kilns and east of Deerland Road with the new primary school to the north and existing residential development to the east.





View across site to north

2.4 On land to the immediate north of the site is the new VC Primary School with vehicular access off the Deerland Road. Nearest the site boundary is the parking and turning area and a MUGA facility with the main school building further to the north.

2.5 To the east of the site is housing development in Gail Rise, two cul-de-sac developments which branch off The Gail and Sprinkle Lane. These developments generally comprise modest detached family houses with a few single storey dwellings and date from the 1970's.

2.6 To the south of the site are three detached residential properties, one of which 'Lyncroft' punctuates the field which the subject of the application. These properties are single storey in form. There are other residential properties on lower ground on the south side of The Kilns. To the west, on the opposite side of the road, there is a detached two-storey property known as The Rectory.

2.7 Prior to the construction of the new primary school, the nearby roads were upgraded in order to accommodate the traffic that was likely to associated with that development. These works included the formation of a new mini roundabout at the junction of The Kilns and Deerland Road and the construction of a pavement from the school to The Kilns, therefore providing a better link to the centre of the village. Off this mini roundabout is a field gate vehicular access which serves the land the subject of this application.

2.8 The Kilns heads west which eventually leads to the village of Johnston to the west. The Deerland Road heads north-west which eventually leads to the nearby village of Hook. The roads in the immediate vicinity of the site are subject to a 30mph speed limit but where traffic is slowed further by the presence of the mini roundabout.

2.9 Llangwm is described as a Service Village within the adopted LDP 2013 for the area. The village is well served by a number of local facilities and amenities, which include a new Primary School in the north-west of the village, a village hall with associated recreation ground, a pharmacy, post office, a public house (The Cottage Inn) and a church. The village is situated on the 308 Haverfordwest-Llangwam-Burton (circular) bus

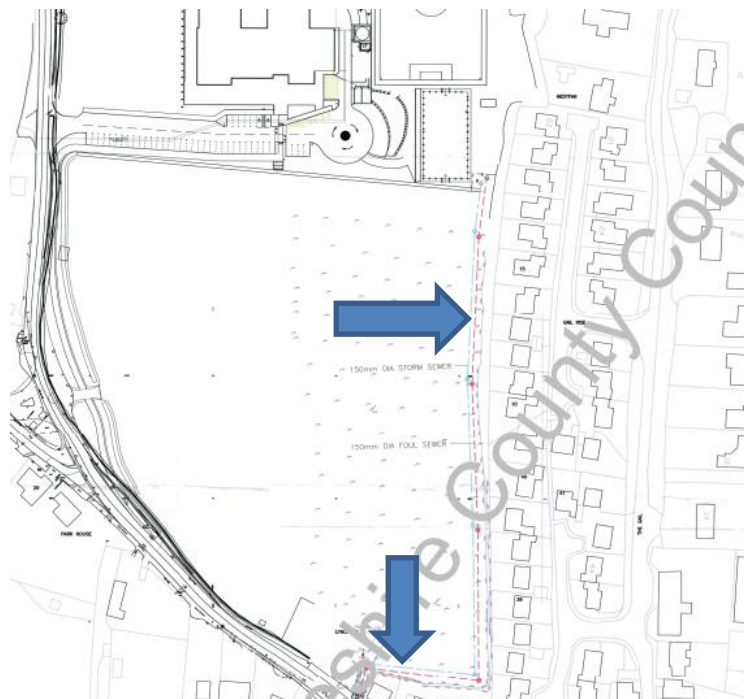
route which is currently at a reduced service. There is a bus stop at The Green with a limited service on weekdays. The closest railway stations to the village are at Johnston (5.5 kms) and at Haverfordwest (9kms). Both are on the same line with Transport for Wales with services westbound to Milford Haven and eastbound to Carmarthen, Swansea, Cardiff and beyond.

2.10 The village is generally characterised by varied development often located adjacent to roads that pass through the village. The more historic and central part of the village is along Main Street a short distance to the south-east of the site and which lie within a Conservation Area. In addition to the more modern cul-de-sac developments at Gail Rise to the east of the site, there is other more modern estate type developments towards the south-eastern part of the village. The immediate surrounding landscape is generally one of a gently rolling agricultural fields with pockets of woodland.

3.0 RELEVANT PLANNING HISTORY

3.1 There is no relevant planning application history directly relating to the application site.

3.2 The land to the north of the Housing Site Allocation Site was the subject of a planning application for the development of a new Primary School to serve the village. This was granted planning permission in December 2016 (reference 11/0425/PA) and has been operational now for some 5 years. The new school replaced the existing school within the village and the one in Burton. Vehicular access was taken off Deerland Road. The proposed school was included as part of the Housing Site Allocation as the proposed services were taken through the site to the south with a connection into existing services in The Kilns. The approved plans showed the services to be routed along the eastern side of the site and to the north of the property 'Lyncroft' to the south. Part of the Site Layout Plan for this development and route of services (as shown by the blue arrow) is provided for information below:



3.3 In conjunction with the proposal for a new school, modifications and improvements were made to the nearby local road network to accommodate the additional traffic that would be associated with the school. These works included a widening of the Deerland Road with a new pavement provided along its eastern side to provide suitable pedestrian access to The Kilns. A new mini roundabout was also provided at the junction of Deerland Road and The Kilns. It is off this mini roundabout that vehicular access will be taken to serve the proposed housing development.

4.0 PRE-APPLICATION ENQUIRY

4.1 On the 26 January 2021, the applicant submitted a development management pre-application enquiry to the PCC for the development of the site with up to 75 dwellings. It was noted that the housing site allocation was to be rolled over into the emerging LDP2. This letter and the Council's acknowledgement (reference PR/0410/20) are attached at **Appendix A**.

4.2 The pre-application enquiry sought clarification on several issues such as whether the Council could endorse an outline application for 75 dwellings (as indicated in the site housing allocation), the indicative housing mix required for the site, the level of SAB detail required pre-submission, and any other pertinent and material planning matters required the LPA feel relevant to the proposal.

4.3 At the time of drafting this Planning Statement and Justification Report (early August 2021) we understand that apart from some initial comments from County Highways (see below and **Appendix B**) there has been no meaningful dialogue or response from the planning department or planning case officer to date. Notwithstanding any issues related to the pandemic, a wait of over 6 months for comments on a major housing proposal in the County is considered extremely disappointing. Perhaps the LPA should consider a refund.

4.4 The main issue highlighted from a highways point of view was whether the principle of accessing the whole development site from the existing access off the mini roundabout would be acceptable. In response to the pre-application case officer dated 26 March 2021, the Highways Engineer Mike Harris stated the following:

'There are no Highways related factors that could prevent the allocation HSG/063/00024 from being carried forward with the 75 dwellings considered before. Details of the Highway access will need to be presented in the future. The roundabout scheme on the C3041/C3043 slows traffic down on the bend and makes locating a safe access, with suitable visibility, so much easier than previous proposals (going back to the early 1990's with the Chichester Nunn plans). The roundabout also helps with pedestrian connectivity to the village. There still may be a need to modify the roundabout to accept a major fourth arm off it.'

4.5 Therefore, subject to some modifications to the existing field access, it was indicated that the arrangement would be acceptable. The further comments of the County Highway Authority are therefore sought as part of this Pre-Application Consultation (PAC) process in respect of the likely highway design requirements at this junction together with other improvements which are likely to form part of the final scheme.

4.6 In early November 2020, the applicant submitted a separate pre-application to Welsh Water seeking advice in respect of the capacity of service infrastructure to support a development of the site for up to 75 dwellings. A formal response letter was dated 26 November 2020 (see **Appendix C**) which included plans

of the nearby sewer and water main networks. Whilst the pre-application enquiry incorrectly referred to a development of 58 units, this was subsequently corrected to the higher figure by the applicant.

4.7 In an email dated 2 December 2020, Welsh Water confirmed that the water supply network, public service system and the Wastewater Treatment Works (WwTW) could accommodate the proposed development of 75 dwellings. However, as the current proposal is now for a lower number of dwellings (54 units) and with less consequent pressure on service infrastructure, this advice should still be valid. The response confirmed the following points:

- The proposed development site was located in the immediate vicinity of the foul sewerage system, which drains to Llangwm SPS and then onto Llangwm WwTW.
- They had considered the impact of foul flows generated by the proposed development and concluded that flows could be accommodated within the public sewerage system. They advised that the flows should be connected to the 150 mm foul sewer at manhole SM98097701 located in The Kilns (the road to the south of the site).
- They confirmed that no problems are envisaged with the Wastewater Treatment Works for the treatment of domestic discharge from this site.
- They advised that the developer is required to explore and fully exhaust all surface water drainage options in accordance with the issued hierarchy and that discharge to a combined sewer shall only be made as a last resort.
- A water supply can be made available to service the proposed development.

4.8 It is noted that Welsh Water has suggested that foul drainage connection be made directly to the existing public sewerage system in The Kilns to the south, rather than connecting in to the 'school route' located on the eastern side of the site. We have noted the route of services indicated on the approved plans for the new Primary School and that this has influenced the layout and development of the site. It is suggested that the final foul drainage connection for the development be reviewed further during the PAC process.

4.9 It was noted that the Cleddau River had been identified by NRW as a river which has phosphate level issues. In an email dated 3 March 2021, the applicant wrote to Welsh Water to confirm whether the treatment works which would deal with foul waste from the site under the proposed development could treat phosphate discharge sufficiently to the required levels for this not to be an issue, or whether there was a likely requirement for the upgrade of the Treatment Works serving this site in order to address this phosphate problem. In an email response of 4 March 2021, Welsh Water confirmed that the Treatment Works did not fall under the SAC river sulphate targets and therefore the comments in their initial consultation response remained unchanged.

5.0 THE PROPOSAL

5.1 The application proposal comprises the development of the site with up to 54 dwellings together with parking, amenity space and landscaping. Use would be made of an existing vehicular access point off the mini roundabout to the west of the site.

5.2 The application is submitted in outline form with only vehicular access to be considered at this stage. Therefore, the principle of development is being sought. However, a detailed illustrative Site Layout Plan is provided which shows how the site could satisfactorily accommodate the scale and form of residential

development proposed, and to create a high-quality scheme. The submitted application indicates the scale parameters of the proposed dwellings, which allows for some flexibility in the size of dwellings in the final scheme, together with an indicative landscaping scheme.

5.3 The site has a total area of 2.8 ha with the proposed development achieving a density of some 19.3 dpha.

5.4 The proposed development would be served from a modified existing mini roundabout spur road which would be upgraded to the required adoptable highway safety standards. It is proposed to extend the existing pavement from the mini roundabout to the southern end of the site boundary, with a road crossover to connect to the pavement on the opposite side of the road. This would provide much improved pedestrian connectivity to the village centre.

5.5 There would be an access road within the centre of the site with various spur roads and turning heads, which would generally be 5.5metre wide roads with 1.8metre wide pavements on either side. The end section of certain roads would be in a contrasting surfacing material. Parking is likely to be provided on the basis of at least two on-site parking spaces with turning per dwelling with some the larger houses also having the benefit of a detached single garage.



Illustrative Site Layout Plan – Drawing Extract P03A

5.6 The illustrative Site Layout Plan shows the proposed dwellings generally positioned facing the internal estate roads, with the proposed dwellings on the western side of the site having their rear elevations and gardens facing Deerland Road and the upper section of The Kilns. The proposed dwellings would have regularly shaped plots with some variation in the size of gardens.

5.7 Whilst the issue of scale is a reserved matter, the application provides an indication of scale parameters. There would be a mix of house types, indicated as A – E on the illustrative Site Layout Plan. The proposed dwellings would largely be detached houses, although the proposed affordable housing units would be in the form of semi-detached or terraced dwellings. The proposal is intended to provide 15% affordable housing in accordance with the Housing Site Allocation requirement set out within LDP1, comprising a total of eight dwellings comprising units 28, 29, 31, 32, and 34-37. These would be dispersed throughout the eastern part of the site.

5.8 The proposal indicates the provision of a mix of house type and size. House types A-C are indicated to be 3-4 bed houses, D to be 2-3 bed units and E to be 2-3 bed affordable units. Whilst the initial proposal for the development of the site is to be submitted in outline form only, we would welcome clarification from the County Council Housing section the likely required housing mix for such a development. This would both for the market and affordable housing elements of the proposal, including meeting more specialist needs such as for older people and people with disabilities.

5.9 We note that a Housing Needs Assessment Report for Mid and South-West Wales in 2019 (dated October 2020) was commissioned by several Council areas, as evidence in relation to the LDP2 review. In Pembrokeshire (outside the National Park) the document indicates that the number of households are predicted to increase by 5,837 or 12.9% by 2033. In terms of housing need by tenure, it predicts that the number of households requiring market housing compared with affordable housing is split 74% and 26% respectively. We note that Figure 27 of the document indicates the changes in bedroom requirements by tenure. For market housing, this is indicated to be 1 bed (5.5%), 2 bed (27.2%), 3 bed (48.1%) and 4 bed (19.2%). For affordable housing, this is indicated to be 1 bed (31.2%), 2 bed (40.5%), 3 bed (25.3%) and 4 bed (3%). Further, Figures 45 and 61 provide a summary breakdown of potential affordable housing demand by bedroom size and tenure over the relevant period, which includes a significant need for social rented housing.

5.10 The proposed dwellings are indicated to be 1.5 or 2-storey in form, with the scale parameters indicating a ridge height of between 6.5 metres and 8.5 metres. This would allow for flexibility at the detailed planning stage. The proposed dwellings would be of traditional design with variations in their appearance and the materials used. They would incorporate various architectural features, including gabled projections, porches, chimneys and varied eaves lines.



Illustrative Site Section in Context – Drawing Extract P03

5.11 There is a change in levels across the site, with a general fall from the north-west to the south-east. The submission indicates the proposed development would have regard to the landform of the site, with some localised levelling of the site required to accommodate the development. Final finished ground floor levels can be confirmed following further survey work at the detailed reserved matters stage.

5.12 Although details relating to design, appearance and landscaping are reserved matters, an appropriate landscaping scheme would form an integrated part of the scheme. The proposal would not impact upon existing boundary features with the few trees that exist within boundary hedgerows being retained. There are no natural features within the main body of the site. Supplementary boundary planting and enhancements are proposed. The plot frontages would be defined by additional planting with the plot boundaries being divided by 1.2 high close boarded fencing.

5.13 The amount of hard surfacing would be kept to a minimum with the sympathetic treatment of plot boundaries, including the use of permeable paving and grass verges, and modest patio areas to the rear.

5.14 We understand there are existing infrastructure services available nearby in the village, including mains water and electricity, with practical connections possible. There is also a mains sewer system in the village with a gravity flow to treatment works to the south of the village. The submission indicates a logical and practical connection of mains sewerage to lateral drains which down the eastern boundary of the site, which connects into a main sewer route in The Kilns. However, final sewer connection arrangements can be clarified and agreed subsequently with Welsh Water.

5.15 Due to the presence of the lateral drains along the eastern side of the site, there is a 6metre building exclusion zone around these drains. According to the approved drawings in respect of primary school development (see earlier), these lateral drains continue to the north and west of the adjacent residential property 'Lyncroft' to the south of the site. Therefore, these areas of the site are free of development.

5.16 It is proposed that surface water be directed to a drainage swale located on the eastern part of the site which would then feed into an infiltration basin or 'balancing pond' located towards the lower south-eastern part of the site. This would provide drainage for all the dwellings and internal roads. This would all be subject to future SABS approval.

5.17 The proposed layout includes the provision of a managed open green space located within the eastern and southern parts of the site. An informal walking route would be provided through this area with an entry point onto the new section of pavement along the northern side of The Kilns, just to the west of land owned by 'Lyncroft'. Its final route and design would be subject to the final surface water arrangements. Additional tree planting would be provided in this area.

5.18 In addition to a robust and detailed landscaping scheme, including supplementary planting around the existing boundaries of the site, various biodiversity enhancements are proposed which are set out within the Ecological Report and indicated on the submitted Site Layout Plan.

5.19 In overall terms, the proposal would represent a high-quality residential development, appropriate to its location, and which would satisfactorily integrate into its immediate surroundings. The proposal seeks to make the most effective use of the site for housing, whilst having regard to its physical and known infrastructure constraints including the presence of lateral drains within certain areas of the site.

6.0 PLANNING POLICY ASSESSMENT

6.1 The site falls within the administrative area of the Pembrokeshire County Council. The Authority adopted the Local Development Plan in February 2013. The most relevant policies identified are as follows:

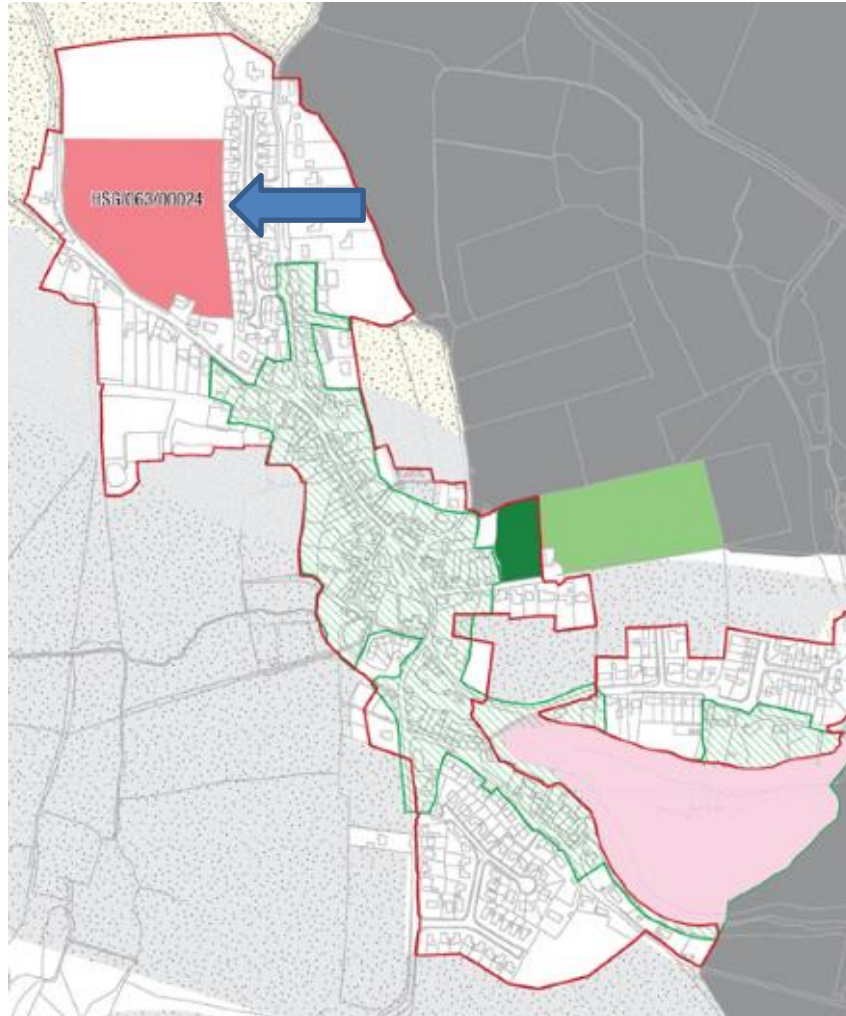
- SP1 – Sustainable Development
- SP12 – The Settlement Hierarchy
- SP13 – Settlement Boundaries
- SP15 – Rural Settlements
- GN1 – General Development
- GN2 – Sustainable Design
- GN3 – Infrastructure and New Development
- GN26 – Residential Development
- GN27 – Residential Allocations
- GN37 – Protection and Enhancement of Biodiversity

6.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 confirms that planning applications should be determined in accordance with the statutory Development Plan for the area, unless material considerations indicate otherwise.

6.3 The application site lies wholly within the defined settlement boundary of Llangwm and forms part of Housing Site Allocation reference HSG/063/00024 within the adopted LDP1. The principle of residential development of the site is therefore acceptable. The defined settlement boundary also included the land to the immediate north of the site which was to be developed for a new Primary School under a planning permission granted in 2011.

6.4 The site is not subject to any specific nature conservation or landscape designations and is not within an area of flood risk. There are no heritage assets in the vicinity that would be materially affected by the development. The setting of the village Conservation Area which covers much of the central part of the village is located a sufficient distance away to the south-east not to be affected by the development of the site.

6.5 Under Policy GN. 27 of the LDP1 the application site forms part of a Housing Allocation Site (reference HSG/063/00024) within the Service Village of Llangwm. It is listed as a site of 3.01 ha with an allocation of up to 75 dwellings (including 15% affordable housing), although it indicates that only 25 of the dwellings are likely to be developed during the Plan period. This indicates an overall density of 25 dpha. Supporting paragraph 6.116 states that the minimum number of units identified for each site are indicative and that developers will be expected to demonstrate that they are providing a mix of house types, to cater for changing patterns in household size. The adopted Inset Map shows the location of the Housing Site Allocation and its position in relation to the village settlement and Conservation Area (hatched light green). It also shows an Amenity Open Space (dark green) and Recreational Open Space (light green) located on the eastern edge of the village.



Adopted LDP1 Settlement Inset Map for Llangwm

6.6 We have had regard to the Council's Development Sites SPG (2016) which provides an appraisal of the site together with constraints which may affect the scope for the residential development of the site. The relevant extract from this document is provided below. The appraisal explains that the land for the proposed housing was included as part of the planning application for the Primary School (reference 11/0425/PA) as the drainage arrangements for the new school extended over part of the housing site. A strip of land along the eastern boundary of the site was purchased by the Council for drainage infrastructure to serve the school.

Llangwm – Opposite The Kilns (HSG/063/00024)				
3.01 Ha	25 (75')	25 Dph	Greenfield	15% Affordable Housing
Site description This housing allocation site is situated in the northern part of Llangwm. There is existing residential development east, south and west of the site, with a new school recently constructed to the north. A strip of land along the eastern boundary of the site has been purchased by the Council for drainage infrastructure to serve the new school. The site has capacity for 75 dwellings, although only about one third of this is expected to be released during the current Plan period.				
Relevant planning history 11/0425/PA – land east of Deerland Garage, Deerland Road, Llangwm – primary school – conditionally approved 26/10/11 (included because the drainage arrangements for the new school extend over part of the housing site)				
Constraints and potential methods to address constraints				
Constraint	Site Issues	Mechanisms to address		
WWTW	Limited WWTW capacity. DCWW would be able to accept 20 houses from this settlement. Higher numbers would require improvements at the WWTW, which would be subject to inclusion in a future AMP or developer contributions to achieve upgrades in advance of this.	Option for a developer to contribute to improvements has been identified (See Section 12 code B). Improvements to this WWTW will be required in DCWW's AMP.		
Sewerage	Sewerage within the site is an easement to serve the new school.	Investigate whether the housing site can connect into the school sewerage easement, or whether new investment is required.		

Water	Moderate ecological status under the Water Framework Directive.	Must ensure no deterioration to ecological status therefore all pollution prevention measures must be in place.
	Minor aquifer beneath Llangwm village.	Must ensure no deterioration to ecological status therefore all pollution prevention measures must be in place.
Flooding	No issues	-
Access/Transport	Traffic will affect the A40 Trunk Road (Merlins Bridge Roundabout). Vehicular access could be from either the village road (Troopers Inn Road) or from Deerland Road.	The SWTRA should be consulted prior to the submission of an application. Consult with the Local Highway Authority on local highway access options.
Contaminated Land	No issues	-
Electricity	No connection constraints subject to site feasibility.	WPD to undertake load assessment once residential mix known.
Other	No issues	The site has potential for the development of 75 dwellings, but a maximum of 25 can be developed during the LDP period (to 2021).
	Potential archaeological interest.	An Archaeological Assessment will be required.
	Potential impact on a Natura 2000 site.	Screening for a project level HRA may be required at application stage.

6.7 The Appraisal highlights that the site has the capacity for 75 dwellings (at a density of 25 dpha) although only about one third of this was expected to be released during the Plan period. We understand this was due to concerns over the capacity of the sewerage treatment works (with Welsh Water indicating a limit of 20 dwellings unless improvements were made to the WwTW). However, as indicated earlier in this Statement, Welsh Water have confirmed that there is now sufficient capacity to support the full development of the site. The Appraisal also suggests possible sewerage connection into the school easement. This has been proposed as part of the current proposal, but an alternative route would be possible directly into The Kilns.

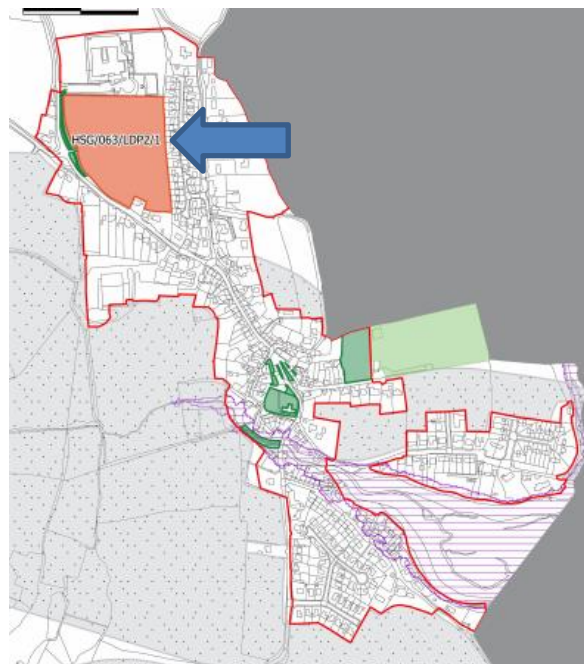
6.8 In terms of access/transport, the Appraisal suggests that vehicular access could be from either the village road (Troopers Inn Road) or from Deerland Road. The County Highways Engineer has clearly indicated that connection to the mini roundabout which formed part of local road improvements would be acceptable subject to final design details.

6.9 The Appraisal indicated there were unlikely to be any issues in respect of flooding, contaminated land, electricity or water, subject to no deterioration to ecological status and that all pollution prevention measures should be in place. However, it suggests there is potential archaeological interest so an Archaeological Assessment may be required. We would welcome clarification from the Council whether such an Assessment is required.

6.10 The County Council is in the process of working on a Replacement Local Development Plan (LDP2) to cover the period up to 2033. Although the process has reached the Deposit Plan stage, the later stages of the LDP Review have been significantly delayed due to Covid-19. Until recently, the Council's Delivery Agreement indicated this emerging Plan was indicated to be submitted to the Welsh Government in

Autumn 2021 with adoption Summer 2022. However, we understand that due to an unforeseen administrative error in 2017 in relation to the notification of interested parties to the LDP2, a further period of consultation is to be offered for the submission and consideration of candidate sites. This will clearly impact upon the progress of the LDP2 and which could involve a re-Deposit Plan being issued for consultation. We understand a revised timetable for the emerging LDP2 is to be issued in due course.

6.11 In relation to the emerging LDP2, Llangwm is now listed as a Service Centre (rather than a Service Village) with no changes proposed to the defined settlement boundary. However, importantly, under Policy GN. 14 it shows the application site to be retained as a Housing Site Allocation (reference HSG/063/LDP2/1) with the land to the north now occupied by the Primary School. The revised Inset Map for Llangwm is provided below:



Revised LDP2 Settlement Inset Map for Llangwm

6.12 The policy states that the site has an area of 1.84 ha with a minimum of 37 units to be provided within the Plan period, with 10% affordable housing (3 units). This indicates an overall density of 20 dpha. However, despite the area of the Housing Site Allocation being the same on both the adopted Inset Map and the emerging Inset Map, we question whether the site area and the projected number of units to be provided on site are correct, with the area of the site being substantially reduced from 3 ha to 1.84 ha. The affordable housing contribution has also been reduced from 15% to 10% although the Council's Development Sites SPG 2016 indicates the site should provide 15% affordable housing. It is noted that supporting paragraph 5.80 under Policy GN. 14 of the emerging LDP2 explains that the minimum number of units indicated for each site is based on the identified developable area (required green spaces including hedge row buffers being excluded from the figures). Therefore, we consider that the Council should review the details of this Housing Site Allocation.

6.13 The current application site has been calculated to have an area of 2.8 ha, being slightly less than that indicated under LDP1. This is because an area of land around the adjacent property 'Lyncroft' to the

south of the site was purchased by the owners of this property and is no longer available for residential development.

6.14 It is noted that the Inset Map now shows additional areas of Open Space (dark green) which includes two narrow strips of land to the immediate west of the Housing Site Allocation. These areas lie outside of the site for development and would not be affected by the proposal.

6.15 It is noted that emerging Policy SP 8 sets out how new development within the Service Centres and Service Villages will encourage sustainable communities. It states that development should be of a scale and nature identified as being appropriate for the settlement. We submit that the proposal would comply with this policy objective. We also note that Policy GN. 13 of the emerging LDP2 introduces new requirements in respect of housing mix (having regard to the Local Housing Market Assessment 2019), space standards and requirements for Lifetime Home Standards.

6.16 Given the stage reached in the LDP2 review process we consider that little weight can be given to the emerging Deposit Plan. Primacy should still be given to the adopted LDP1. However, the fact that the application site is proposed to be retained as a Housing Site Allocation as part of the emerging LDP2 is an important material consideration in the assessment of the current proposal.

Principle of Development

6.17 Policy SP1 states that all development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised. These objectives are deemed to have been achieved for the reasons set out throughout this statement.

6.18 *Planning Policy Wales: Edition 11* (PPW) published in February 2021 provides the overarching policy framework against which all planning applications are determined. The key focus is on achieving sustainable development through the planning system and that it improves the social, economic, environmental and cultural well-being of Wales.

6.19 It seeks to achieve well-being through the concept of 'placemaking' which is set out as follows:

What is Placemaking?

"Placemaking" is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well being in the widest sense.

Placemaking considers the context, function and relationships between a development site and its wider surroundings. This will be true for major developments creating new places as well as small developments created within a wider place.

Placemaking should not add additional cost to a development, but will require smart, multi-dimensional and innovative thinking to implement and should be considered at the earliest possible stage. Placemaking adds social, economic, environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary and embed wider resilience into planning decisions.

6.20 The proposal comprises a sustainable form of development and would create a well-designed and attractive residential environment, where people want to live, work and socialise.

6.21 The proposal would achieve social objectives in the provision of new housing and where occupiers would be able to integrate into the local community and support local services and facilities; there would be an appropriate on-site contribution towards the provision of affordable housing; it would achieve economic objectives in providing employment in the construction industry; and environmental objectives in that it would have full regard to the nature conservation interests of the site together with significant enhancements.

6.22 Policy SP 13 sets out the Settlement Hierarchy for the County. Llangwm is classed as a Service Village, which offer a good provision of services and facilities to meet the day to day needs of their population.

6.23 Policy SP 15 states that within the Rural Settlements, developments will encourage sustainable communities such by promoting development of a scale and nature identified as being appropriate for the settlement. Whilst the scale of development is significant, it comprises a Housing Site Allocation within the adopted LDP1. However, due to various physical constraints including the need to avoid some sub-surface infrastructure present on the eastern boundary of the site and the requirement for open space and ecological buffer zones, the number of units that can be achieved on site and the overall density have had to be reduced, but would still make a significant contribution to the housing needs of the area.

6.24 In functional, physical and visual terms, the development would be well-related to the existing settlement. The site has clearly defined boundaries with the Primary School to the north, existing estate residential development to the east and roads to the west and south, with some additional residential development to the south of The Kilns. There would be good and convenient access to existing services and facilities within the village.

6.25 There would be no encroachment beyond the site boundaries into open countryside, with no conflict with Policy SP 16 which seeks to protect the countryside from inappropriate development. The surrounding and wider landscape would be protected.

6.26 The proposal seeks to make the most effective use of land suitable for residential development, in accordance with the physical constraints of the site and the parameters set down under the Housing Site Allocation Policy GN. 27 and the Site Development SPG 2016. The site lies directly adjacent to existing cul-de-sac housing development in Gail Rise to the east. Therefore, the proposal would not be out-of-keeping with the general pattern and form of development in the immediate locality.

6.27 The proposal would comply with Policy GN. 26 in that it would comprise the provision of new market and affordable housing to meet local needs within the defined settlement boundary of a Service Village. This policy also states that new dwellings built on sites of 0.1 ha and above should be built at a density of at least 25 dpha rising to at least 30 dpha in towns. However, the policy indicates that in some circumstances a lower density may be justified. The proposal relates to a Housing Site Allocation under Policy GN. 27 and as explained earlier in this Statement, the lower density is justified by the physical constraints of the site. This includes that a significant part of the site to the east and south is required to be free from development due to the presence of service infrastructure and the need to provide an appropriate sustainable drainage system to service the development. We understand from the applicant's solicitor that he has advised that the dwellings and their gardens should be kept away from the

water/sewerage pipes on the periphery of the site to avoid plot sales and homeowner problems in the future.

6.28 Given these material considerations there is argued to be a clear and favourable policy context for the residential development of the site.

Layout, Scale and Design

6.29 Policies GN 1 and GN 2 require, amongst other things, for new dwellings to be sustainably designed, to reflect the character of the surrounding area and to have an acceptable impact on neighbouring properties in terms of design, scale, visual impact and amenity. The proposal would comply.

6.30 The nature, location, siting and scale of the proposal is compatible with the capacity and character of the site and the area within which it is located. The proposal seeks to make the most effective use of the site having regard to the parameters set down in the adopted LDP1 and the Council's Site Development SPG. The density of the scheme, plot size and spacing between the proposed dwellings would fully reflect that of the surrounding development, particularly that to the east of the site in Gail Rise. Each of the proposed dwellings would have access to a suitable private garden area with a good level of privacy, enhanced by boundary planting.

6.31 The proposal would clearly change the character and appearance of the site, which is currently used as a field. However, the site lies within the identified settlement boundary of Llangwm and is an allocated housing site. The site is well related to the existing settlement and would be viewed within this context. There is existing cul-de sac development adjoining to the east of the site and other residential development to the south of the site. There is the new Primary School on the higher and more prominent land to the north. The adjacent roads to the west and south and boundary hedging also provide a high degree of physical and visual containment of the site.

6.32 The residential development of the site would have some impact upon the character and landscape setting of the village. The village of Llangwm forms part of the 'Johnson Lowlands' LCA which comprises a rolling plateau landscape of gentle hills and valleys between Haverfordwest and Milford Haven. It is farmland dominated by pastoral agriculture with hedge banks, trees and woodland belts in valleys, with the area interspersed with scattered villages with two primary roads the A 4076 and the A 477 having a significant influence on the area. The eastern part of the areas is more rural, such as around Llangwm and Hook.

6.33 The proposal relates to a large open field and is sloping in nature, with the higher ground to the north. The proposed development would be clearly visible when passing through the village along The Kilns to the south and Deerland Road to the west and given the local topography of the area, the development is likely to be visible from the lower ground to the south and west of the main village settlement. However, it is likely to be less visible in views from the west and where visible in the approach along local roads, would be seen within the context of existing development. Any potential views would be obscured by the presence of boundary hedging and trees along local roads and fields.

6.34 Policy GN.1 also requires new development to have regard to the special qualities of the Pembrokeshire Coast National Park. The boundary of the National Park lies to the immediate east of the village of Llangwm (as indicated by the yellow line of the Right of Way Definitive Map below). However,

the proposed development is located on the north-western side of the village and adjacent to the built-up part of the village. Therefore, the proposal is unlikely to have any material impact upon the setting and special qualities of the National Park.

6.35 There are several public rights of way in the vicinity of the site. For example, on the northern edge of the village are a series of Public Bridleways (including reference PP/46/17) which passes close to the north of the new Primary School (not shown). However, any views of the proposed development are likely to be very limited from this direction. To the south of the site, a Public Footpath (reference PP/46/13) leads off to the south of The Kilns and joins up with another Public Footpath (references PP/46/9 and PP/7/18) which extend westward from the main centre of the village. It is possible that the proposed development may be visible from certain sections along this network. The location of the site in relation to the nearby public rights of way network is illustrated on the following Definitive Map extract:



Definitive Rights of Way Map Extract (Source: Pembrokeshire CC)

6.36 In view of the location of the site, the proposal would neither contribute to the coalescence of distinct settlements nor create or consolidate ribbon development. It is noted that much of development pattern within the village generally follow the roads through the village, but there are many examples of cul-de-sac type developments which form an important part of the village character. The village has a generally compact form and the proposal would respect that pattern and form of development.

6.37 The proposal would be appropriate to the local character and context, such as in terms of layout, scale, form, massing, height, design and appearance. Essentially, the layout of development would reflect the pattern of the adjacent development to the east of the site. Whilst there likely to be a need to upgrade and modify the existing vehicular entrance off the mini roundabout to comply with highway standards, the required changes are likely to be very modest. Therefore, any impact from the main vehicular access would be limited and localised and would not harm the general street scene context.

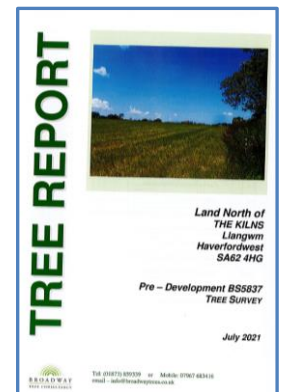
6.38 Whilst the Site Layout Plan is submitted for illustrative purposes only with matters in relation to scale, appearance and landscaping being reserved, additional details are provided to demonstrate how a high-quality development can be achieved on this site. The dwellings are largely presented as detached dwellings, although there are examples of some semi-detached and terraced dwellings to meet specific

housing needs. Appropriate levels of private amenity space and parking/turning are allocated to the individual dwellings.

6.39 The submitted illustrative elevations demonstrate show that the proposed dwellings could be up to two-storey in form, although the proposed illustrative scale parameters allow for flexibility in terms of their size, height and scale. The proposed dwellings would be compatible in design terms with the immediate and wider locality. There is some variation in the form and appearance of the surrounding residential development, with both two-storey and single storey detached dwellings. Final dwelling design and external materials are to be agreed at the reserved matters stage and high-quality materials can be secured via an appropriately worded condition.

6.40 The site would also be delineated with existing and new hedgerows and appropriate planting to assimilate the development into the locality. The boundary vegetation and trees would be retained and supplemented where there are gaps, such as along the site boundary with Gail Rise to the east. A significant part of the site would be given over to amenity open space with a significant amount of new hedge and tree planting within the development itself.

6.41 A Tree Survey Report forms part of the submission. This is attached at **Appendix D**. The Survey identifies four sections of hedgerow and a total of nine trees located around the boundaries of the site. Most of the trees are located along the south-eastern and eastern boundaries of the site and would therefore be away from the proposed housing. Of these natural site boundary features, none are listed as Category A, six as Category B and the remainder as Category C, with none of the trees listed as Category U for removal. The hedgerows are of mixed type and although of varying quality, generally provide a good degree of screening for the site. The trees generally comprise Sycamore, Oak and Ash. Given that these natural site features are confined to the boundaries of the site, and having regard to the proposed illustrative site layout, no works are required.



6.42 The proposed dwellings would be constructed to current building standards and as such would be sustainable in terms of thermal properties and water conservation. However, these are more detailed matters would be addressed further at the reserved matters stage.

6.43 Necessary and appropriate service infrastructure is available and appropriate vehicular access and parking can be provided.

6.44 The proposal would create an inclusive and accessible environment for users that addresses community safety. Given local topography, level access across the site would not be achievable although there would be general level access provided within and around the individual dwellings. Adequate security would be provided by appropriate boundary treatments and the surveillance of car parking and garden areas.

6.45 This submission is accompanied by a Drainage Strategy Report. The Report covers the existing drainage arrangement, the proposed water drainage arrangement, and demonstrates compliance with the principles of



Sustainable Drainage Systems (SuDS). This is attached at **Appendix E**. In terms of existing drainage, the Report confirms that Welsh Water records indicate the presence of a 150mm diameter public sewer running south-east to the south of the site in The Kilns. This is their preferred location of connection for the development. Further, Welsh Water do not have any records of surface water or combined sewers in the vicinity of the site.

6.46 The Report outlines that surface water runoff would be collected through gravity-fed gutters and downpipes for the proposed buildings, which will be diverted through rainwater butts overflowing into the network if unused. Within access roads, gullies will be used to convey water from west to east across the site into a conveyance swale across the eastern end of the site to a large infiltration basin to the southeast. Site testing shows that infiltration is suitable. The proposal also includes rainwater harvesting with rainwater butts provided at appropriate locations to provide non-potable water.

6.47 The Report explains that the site is not located in a Groundwater Source Protection Zone so there are no additional specific sensitivities.

6.48 The Report highlights that the amenity value of the site would be added to as the conveyance swale would be located adjacent to walking routes and site green space and aiding to create aesthetically pleasing spaces. The infiltration basin is likely to include vegetation above the basin invert levels in areas that exceed the max water level. These new natural site features would also promote the biodiversity value of the site. It indicates that at full SAB stage, a species and planting strategy will be submitted alongside the SuDS features to demonstrate the effects on habitats going forward.

6.49 Paragraph 5.20 of the Report sets out the proposed operation and maintenance arrangements for the proposed drainage arrangements.

6.50 Given the above considerations, the proposal is considered entirely acceptable in terms of layout, scale, form and design and would make a positive contribution to the character and appearance of the area. The proposal would represent a sustainable layout and form of residential development.

Neighbouring Amenity

6.51 In accordance with Policy GN 1, the proposed layout and orientation of the dwellings would ensure that the amenity of neighbouring occupiers would not be compromised in terms of over-bearing impact, overlooking or loss of light.

6.52 There is the Primary School to the north of the site with its access road and a MUGA sports facility located closest to the northern boundary of the site. The main school building is located further away to the north. The proposed dwelling units on the northern part of the site would have their rear gardens facing the school grounds. Whilst there would be some disturbance to the occupiers of these proposed dwellings from the various activities on this part of the school, there is existing boundary hedge screening which it is proposed to be enhanced as part of the proposed development. This screening should be sufficient to minimise any noise and disturbance.

6.53 To the east of the site is the existing residential development in Gail Rise. The proposed housing would be located away from the eastern boundary, with this part of the site to comprise an amenity open space with informal footpath link together with the provision of a sustainable surface water drainage

system, including swales and an infiltration pond located to the south-east. Whilst the proposed dwellings on this part of the site would face towards the rear elevations of the dwellings in Gail Rise, the separation distance would be significant. Again, it is proposed that the existing boundary screening be retained and supplemented by new hedgerow where more open, as part of the proposal which would ensure the privacy and amenity of these occupiers.



*Views of adjacent properties and boundary treatment
in Gail Rise*

6.54. There are a few residential properties located to the south of the site. These include 'Lyncroft' which is a detached bungalow and where its rear elevation faces towards the proposed development. We understand the owner of this property acquired an area of land on three sides which technically formed part of the Housing Site Allocation. Whilst there is some boundary hedging, its boundaries are generally open in nature. The layout of the proposed development includes a continuation of the amenity open space and informal footpath to the rear and western side of this property. Whilst the proposed housing on the southern part of the site would be on rising ground, the units are positioned with their flank elevations facing this property and which together with the significant separation distance, would ensure that the privacy and amenity of the occupiers of this property are safeguarded.



View of adjacent property 'Lyncroft'

6.55 It is not considered that the proposed infiltration pond located to the south-east of the site would materially affect the amenity of neighbouring residential occupiers. It would represent a low-key landscape feature and as illustrated in the submitted Section drawing, seeks to make use of the local topography with minimal modification to ground levels. The final design details can either be agreed as part of the reserved matters stage or be the subject of condition.

6.56 Whilst there are some other residential properties on the opposite side of the adjacent roads to the south and west, there would be a significant separation distance together with retained/enhanced screening along the site boundaries. These properties are also separated by public roads.

6.57 Therefore, the relationship between the proposed development and neighbouring buildings would be acceptable. However, it should be stressed that the proposed layout is illustrative only at this stage and that the final position and orientation of the proposed dwellings can be revised at the reserved matters stage.

Access

6.58 Policies GN.1 and GN 2 require development proposals to take place in an accessible location; to incorporate sustainable transport and accessibility principles; would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network; and necessary and appropriate service infrastructure, access and parking can be provided.

6.59 The proposal would involve the erection of up to 54 dwelling units with use being made of an existing field gate access off the mini roundabout to the west of the site. This is deemed to be the most logical and practical vehicular access to the proposed development.



View towards mini roundabout



*Views of visibility from existing vehicular access point
and existing pavement*

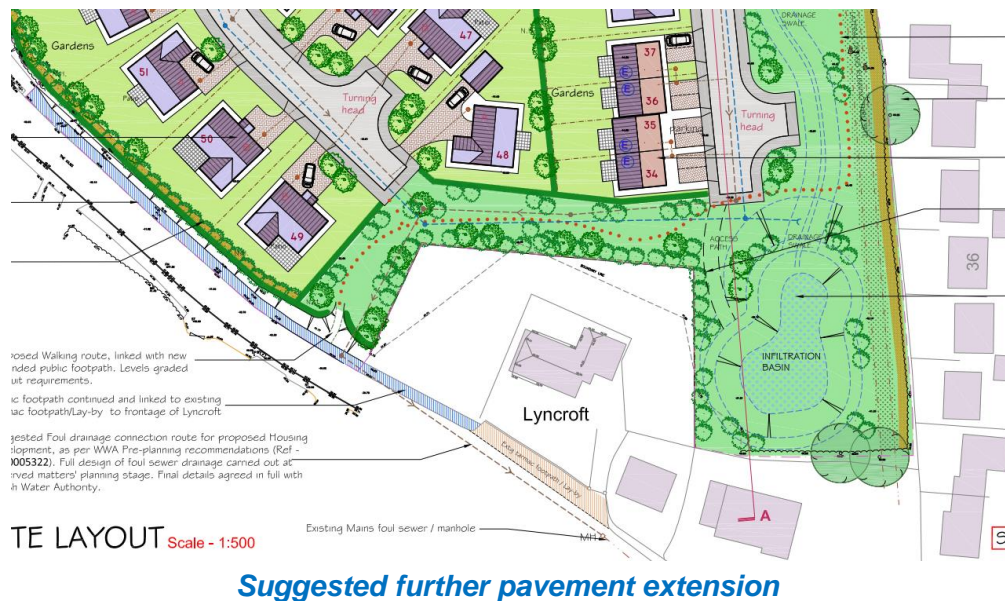
6.60 As outlined earlier in this Statement, the proposed development of the site has been the subject of pre-application discussions with the County Highways Engineer. The Engineer has confirmed that the proposed vehicular access is likely to be acceptable, subject to finalising the final design details such as to provide adequate visibility. We acknowledge that there is likely to be a requirement to modify and upgrade the existing spur road to adoptable standards. In our view, there are no obvious obstacles to modifying the existing spur road to the required adoptable standards or to providing the required visibility sightlines.

6.61 The roads at this point are subject to a 30mph speed limit through the village. The provision of the mini roundabout formed part of a series of road improvements in this location, built in conjunction with the new Primary School. This has improved highway safety conditions. The amount of traffic generated by the development would be significant. However, given the immediate road context, we believe the proposed development can be satisfactorily accommodated onto the surrounding local road network without harm to highway safety.

6.62 As part of the proposed layout, there would be appropriate turning arrangements within the site such as for service vehicles, together with an appropriate level of parking provision and refuse storage facilities. Parking would be to the Council's Guidelines. Suitable pavement access would be provided within the development and to and from the site.

6.63 The proposal includes various highway improvements which would be of benefit to the local community. These include the extension of the pavement across the site frontage and a crossing further to the south, providing better and safer access for the future occupiers of the development and school children and parents of the school. The proposal also includes a pedestrian link from the eastern part of the development across amenity open space to the northern side of The Kilns.

6.64 However, as part of the design evolution of the scheme, it is suggested that the pavement on the northern side of The Kilns could be extended further. This would join up with an existing hard standing area in the front of 'Lyncroft' which appears to be used for parking layby. In the following plan extract, the current pavement extension is shown hatched blue with a possible extension shown in blue and red (outside 'Lyncroft').



6.65 Until this point, the footpath on the opposite side of the road is extremely narrow (to the point you could barely push a push chair down it without being forced onto the road) and the pavement on the southern side of the road would appear to widen at a point almost opposite the property 'Lyncroft'. However, we recognise there may be a potential conflict with the existing parking area. The existing highway position along this section of The Kilns is shown in the following photograph:



The Kilns in front of 'Lyncroft' looking west (Source: Google Maps)

6.66 The provision of this new footway would provide a marked improvement to pedestrian safety, which would be a further benefit arising from the scheme. This would certainly improve pedestrian safety for children and parents walking to and from the school. We would welcome the views of the County Highway Authority on the proposed and further suggested local highway improvements along The Kilns as part of the PAC process.

6.67 Given the above considerations, we consider the proposal should be acceptable in transport and accessibility terms, which could also incorporate some welcome highway safety improvements for pedestrians.

Affordable Housing

6.68 The application submission proposes the erection of up to 54 dwellings and therefore, in applying the 15% requirement, 8 affordable dwellings would need to be provided on site. Accordingly, the submission indicates the provision of 8 affordable housing units, being the semi-detached and terraced units 28, 29, 31, 32 and 34-37. This would meet the requirements of the policy and SPG. These are indicated to be 2-3-bedroom units.

6.69 There is no objection to this in principle and a Unilateral Agreement and certificate of title can be completed during the formal application process.

Infrastructure and Contributions

6.70 Policy GN. 3 states that where development generates a directly related need for new or improved infrastructure, services or community facilities and this is not already programmed by a service or infrastructure company, then this must be funded by the development. These should be provided on site wherever possible and be related in scale and kind to the development.

6.71 We have had regard to the Council's Planning Obligations SPG 2015 and the thresholds which apply to the various purposes.

6.72 Earlier in this statement we have already addressed the issues in respect of affordable housing and service infrastructure. In respect of service infrastructure, Welsh Water have confirmed that there are unlikely to be capacity issues in respect of water and sewerage with connections available in the locality.

6.73 In terms of amenity and play space, we note there are unlikely to be any requirements in respect of the provision of a LEAP, NEAP or MUGA given that the proposed development falls below the relevant thresholds. However, it recognises that alternative financial contributions may be justified in certain cases. It is noted that a MUGA facility was provided as part of the Primary School development. However, we note that such a proposal may require the provision of informal play space of at least 400 sqm (developments in excess of 33 dwellings). A large area of informal open amenity is to be provided on the eastern part of the site with convenient access for occupiers of the proposed development. However, with existing recreation facilities being available in the village by the village hall and within reasonable walking distance, we seek clarification as to whether the Council would require on-site provision or would be happy for an appropriate off-site financial contribution.

6.74 We note that financial contributions are likely to be required in respect of transport, education, community facilities and libraries. The proposal includes various highway improvements as part of the development and that the village benefits from a relatively new primary school. The village also benefits from a mobile library service.

6.75 We would therefore welcome clarification as part of the PAC process whether the proposal is likely to attract or justify the need for any additional infrastructure or community facilities and/or financial contributions.

Biodiversity

6.76 Policy GN.37 and GN.1 require development to respect and protect the natural environment, including protected habitats and species. Further, they state that all development should demonstrate a positive approach, and that any effects are minimised or mitigated through careful design, work scheduling or other appropriate measures and wherever possible, enhance biodiversity.

6.77 The application is accompanied by a Preliminary Ecological Survey of the application site, which attached at **Appendix F**. A summary extract of the overall findings is provided below:

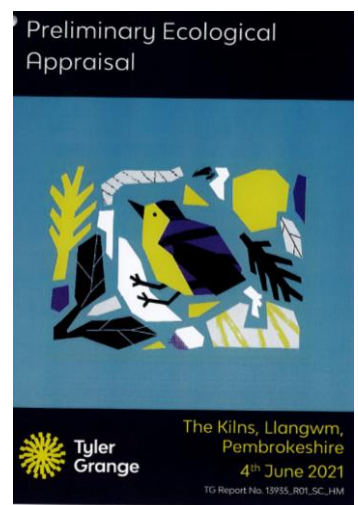
'S.2. The site comprises amenity grassland, a dry ditch and hardstanding of negligible ecological importance; scrub, poor semi-improved grassland and species-poor hedgerows, hedgerows with trees and scattered trees which are considered to be of local ecological importance.'

S.3. Four statutorily designated site lie within 10km of the site, with the closest being Pembrokeshire Marine Special Area of Conservation (SAC) located approx. 0.56km south of the site. Due to nature of the site for residential housing and the distance to the SAC, it is expected that a Habitat Regulations Assessment (HRA) Stage 1 Screening Assessment and Stage 2 Shadow Appropriate Assessment will be required to inform a planning application on the site to determine if the development may have a likely significant effect on the SAC.'

S.4. The survey identified evidence of badger using the site for foraging and commuting, and limited potential for other protected and/or priority species, namely bats, birds, hedgehog and reptiles, which are mainly associated with the species-poor hedgerows and poor semi-improved grassland (particularly its margins).'

S.5. Further surveys are recommended for bats, badgers, wintering birds and reptiles to inform a planning application.'

S.6. By incorporating design principles to retain and enhance features of highest ecological importance, such as hedgerows and trees and by including native species and wildlife friendly planting, inclusion of a drainage pond designed with ecological benefits and features for protected/priority fauna including hibernacula, log piles, bat and bird boxes within the designs, the site should deliver biodiversity benefits and would be in conformity with relevant planning policy and legislation.'



6.78 It is noted the Report recommends that additional Phase II surveys are required in order to inform a formal planning application. These requirements are set out at section 4.1 of the Report. These additional surveys have been commissioned by the applicant and any findings/recommendations will be incorporated into the final scheme prior to formal submission.

6.79 Whilst the Report refers to a scheme of up to 75 units, it recognises that the proposal was under review, being subsequently reduced in number to 54 units with the eastern part of the site having to remain free from development. The Report recommends that habitats of highest ecological importance such as hedgerows, scattered trees and scrub should be retained and enhanced onsite to continue to provide potential opportunities for protected/priority fauna. These existing features are to be retained as part of the proposed development.

6.80 Section 3 of the Report highlights there are opportunities within the scheme to deliver biodiversity net gain. These include incorporating and creating species rich grassland within open space, including areas with informal management; incorporating native species rich hedgerows and trees; enhancing retained hedgerow across the site; incorporating a drainage pond designed with ecological benefits including with wetland planting; incorporating landscape planting that is of benefit to wildlife; and incorporating hibernacula, log piles, bird and bat boxes within the site.

6.81 Many of these biodiversity enhancements have been included and form an integral part of the overall development, as illustrated on the illustrative Site Layout Plan and schedule of biodiversity enhancements. Some of the key features of the proposal include the retention of a significant part of the site as amenity open space together with swales and a drainage pond, also acting as wetland/wildlife features; additional hedgerow planting along the more open eastern boundary of the site; the retention of ecological buffer zone along the eastern boundary; significant additional tree planting within the amenity open space areas; and supplementary planting along and within the site's boundaries.

6.82 As such, the proposal should be acceptable in ecological impact terms and by incorporating a wide package of biodiversity measures, would only significantly enhance the biodiversity value of the site. The enhancement and management recommendations can be secured via a suitably worded condition at the reserved matters stage.

7.0 SUMMARY/CONCLUSIONS

7.1 The application site lies within the defined settlement boundary of the village of Llangwm of the adopted Local Development Plan for the area. The site also forms part of a Housing Site Allocation (reference HSG/063/00024) which is proposed to be carried forward in the emerging LDP2. Therefore, the residential development of the site is acceptable in principle.

7.2 The application is submitted in outline form with only vehicular access to be considered at this stage. It therefore seeks to establish the principle of development and to address any highway safety issues. However, as part of the pre-application consultation process, we would welcome feedback in respect of the proposed indicative site layout, housing type and mix, the sustainable drainage system arrangements, and any other likely infrastructure requirements/contributions which may be generated by the development. This may include requirements in respect of open space, play space, transport improvements and community facilities.

7.3 The proposal should be considered within the context of the adopted LDP1 and more specifically the Housing Site Allocation under Policy GN. 27 and the Council's Development Sites SPG. In our view, having regard to the physical constraints of the site, the proposal would fall within the overall policy requirements. As part of this submission, however, we have highlighted issues in respect of the proposed Housing Site Allocation as part of the emerging LDP2.

7.4 The site is situated in a sustainable location on the edge of the village of Llangwm, close to a range of local facilities, services and amenities.

7.5 The supporting illustrative information submitted in support of the application, which includes a detailed Site Layout Plan with illustrative elevations and landscaping details, demonstrate how the proposal can be satisfactorily accommodated on the site and integrate within its immediate surroundings. The layout, density, scale and form of development proposed are deemed to be entirely appropriate and acceptable.

7.6 The proposal would be well-related to existing built form and given the position of the site and adjacent development there would be limited impact upon the street scene, village setting and wider landscape.

7.7 The proposal would make a significant contribution to the housing needs of the area, with an appropriate size and mix of housing indicated to be provided on the site. In addition, the proposal includes an appropriate amount of affordable housing in accordance with current local policy and guidance.

7.8 There are not considered to be any technical obstacles to the development of the site, with basic service infrastructure being available nearby. During an initial pre-application submission by the applicant, the County Highway Engineer has given a clear indication that the proposed vehicular access arrangements are likely to be acceptable and that Welsh Water has confirmed that there is sufficient infrastructure capacity within the locality, particularly in respect of the local sewerage treatment works.

7.9 The proposal would have regard to the topography and existing natural features of the site; and the proposal would have regard to the nature conservation interests of the site, with significant biodiversity enhancements proposed. The development of the site would safeguard neighbouring amenity.

7.10 The final details of the scheme will be influenced by any further comments received through the pre-application consultation (PAC) process with the Council.

7.11 The proposal is therefore considered to be acceptable and to comply with the relevant policies of the adopted Local Development Plan for the area.

7.12 The proposal is considered to have significant planning merit. Given these considerations, it is respectfully requested that outline planning permission be granted for the development as set out in this submission.

If any further information is required or alternative options/solutions need to be discussed, please do not hesitate to contact Hayston Developments & Planning Ltd.

REPORT PREPARED BY
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SENIOR PLANNER

REPORT REVIEWED BY
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RTPI

mediation of space · making of place

Appendices