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Os gwelwch yn dda gofynnwch am

Claire Jenkins

Mr A Vaughan-Harries
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Dear Mr Vaughan-Harries

Proposal: Demolition of redundant derelict hotel and erection of 37 affordable homes

Location: Former Cleddau Bridge Hotel, Essex Road, Pembroke Dock, SA72 6EG

Thank you for your statutory pre-application enquiry made valid on 7th May 2024. You have requested that your proposal is considered under the Welsh Government Statutory Pre-Application Advice Service.

Development

Demolition of the former Cleddau Bridge Hotel and erection of 37 affordable homes with ecological enhancements.

<u>Relevant</u>	<u>Planning</u>	<u>History</u>
22/0510/PA - Demolition of Hotel and Siting of Residential Care Home and Linked Bungalows.	Approved	24 th February 2023

17/1285/PA - Change of use of former hotel to 48 bedroom care home. Approved 22nd May 2018

Policy and Guidance

The development will be considered against the following policies and guidance –

Local Development Plan

SP 1 (Sustainable Development)
SP 8 (Affordable Housing Target)
SP 12 (The Settlement Hierarchy)
SP 13 (Settlement Boundaries)
SP 14 (Hub Towns)
GN.1 (General Development Policy)
GN.2 (Sustainable Design)
GN.3 (Infrastructure and New Development)
GN.26 (Residential Development)
GN.28 (Local Needs Affordable Housing)
GN.33 (Community Facilities)
GN.37 (Protection and Enhancement of Biodiversity)
GN.38 (Protection and Enhancement of the Historic Environment)

Planning Policy Wales (Edition 132)

Future Wales: the national plan 2040

Supplementary Planning Guidance

- Biodiversity (adopted May 2014)
- Parking Standards (June 2013)
- Planning Obligations (September 2016)
- Affordable Housing (September 2015)

Material Considerations

- Acceptability of the delivery of affordable housing on the site
- Scale, form and design and the effect on the character of the site and area and on amenity
- Highway safety
- Protection and enhancement of biodiversity
- Drainage

Initial Assessment

The proposal is for the demolition of the redundant Cleddau Bridge Hotel and the erection of 37 new affordable homes which would be offered as a mix of social rent and affordable housing. The submitted plans detail a mix of homes of which some would front Essex Road to the south and the others would be arranged around a new internal road with a turning head, a sustainable drainage system, planting and public open space.

Policy 7 of Future Wales states that 'Providing housing in Wales at levels which meet our needs is a key priority for the Welsh Government. The planning system must facilitate the provision of additional market and affordable housing'. The Local Development Plan sets out the specific policies in which proposals for affordable housing would be considered.

The site comprises the site of the former Cleddau Bridge Hotel which is currently derelict following fire damage in March 2019, and its associated car parking and external areas. The remaining building has two storeys over a split level with ground levels falling to the north. The site is located within the settlement boundary of Pembroke Dock. Access is gained via Essex Road to the south which joins the A477

to the east. Residential properties lie to the south and west and the Milford Haven Waterway and Cleddau Bridge lie to the north and north east respectively.

The strategic policies of the LDP supports development which encourages sustainable communities and complementary relationships between Towns by promoting a range of development which include high quality accommodation that supports diversity in the residential market. The detailed policies (policies GN.26 and GN.28) of the LDP support the development of affordable housing to meet local needs within a defined settlement boundary and require that sites of 0.10 hectares and above should be built at a density of at least 30 dwellings per hectares in Towns. The site has an area of approximately 1.24 hectares and the proposal is for the delivery of 37 homes; this equates to a building density of 30 dwellings per hectare as such this density is considered to be appropriate for the site.

In terms of scale, a mix a property sizes is detailed on the submitted plans. The property types should reflect the identified need for bedroom sizes within the Local Housing Market Assessment (A copy of which is available on the Council's website or on request from the Council's Housing Department). The LHMA 2021 records that 2,037 households are in need of affordable housing in Pembrokeshire. In Pembroke Dock the following tenure of new accommodation will be in need by 2033:

- 161 x Market housing
- 24 x Intermediate
- 80 x Social rented

The size of new affordable accommodation required by 2033 is as follows:

- 16 x 1 bedrooms
- 17 x 2 bedrooms
- 72 x 3 – 4 bedrooms

The supporting information provided with your pre-application enquiry details the size of homes would include 18 x 1 bedroom, 13 x 2 bedroom and 6 x 3 bedroom homes. Any planning application would need to be accompanied by an affordable housing statement demonstrating that the proposed mix of housing tenure and size is appropriate for its Community Council area. I can advise that any successful application would be subject to a mechanism to secure the tenure of the dwellings as affordable homes.

In terms of detailing, the dwellings would be 2 storey traditional homes under a pitched roof with a mix of external materials including brick faced and part clad walls with private garden spaces and parking. The pattern of development would be in keeping with the surrounding housing developments and character of the locality. Landscaping would be incorporated into the development including the retention of a tree and the incorporation of raingardens would provide some useful green infrastructure. It would appear from the indicative layout that there would be no direct overlooking or loss of privacy from the proposed development and the dwellings would be adequately separated within the site.

The indicative plan shows that the majority of the dwellings (units 1 -19) would be accessed directly from Essex Road, the highway would be used for turning. The design and accesses fronting the carriageway would be similar to the existing residential properties flanking both sides of Essex Road carriageway and neighbouring cul-de-sac of Cenarth Close. Providing that the required visibility splays for the

adjacent highway are in place this is considered to be acceptable.

The previously formed access near to the eastern boundary off Essex Road would be utilised for the remainder of the properties. No details regarding the road width, radii or visibility splays for this access have been stipulated; which would need to be 2.4m x 25m with no obstruction within the splays.

The existing footway is shown to continue across the full frontage and into the site which is welcomed, however no details have been given to the width of the footway which would be required. Dropped kerbs and tactile paving would also be required to be provided at the junction access to aid vulnerable pedestrians.

With regard to the internal layout, one access road with a turning head at the end of the cul-de-sac, with designated footways on either side of the carriageway is shown. No details have been submitted regarding the swept paths for Fire Tenders and Refuse Lorries for the turning head, to ensure that there is sufficient spaces for these vehicles to manoeuvre and turn throughout the sites internal infrastructure safely and would be required with any formal planning application.

In terms of parking the site falls within Pembrokeshire County Council's Supplementary Planning Guidance – Parking Standards (2013), Zone 4. The submitted plans show onsite parking for 1 vehicle for 1-bed apartments and 2 spaces for 2 – 3 bed properties which is within the guidance standards. Whilst there is no requirement to provide visitor spaces within the development due to the high density provision and to avoid injudicious parking on the pavement, it is recommended that two visitor spaces are provided within the site.

A Transport Statement (TS) will be required to be submitted to support the proposed development with any forthcoming application. At minimum this should include current traffic flows and proposed trip generation of the development, if the proposal is expected to have a significant impact upon the public highway in terms of capacity or highway safety proposed mitigation measures to combat these could be included. Measures to improve the accessibility of the site and promote active and sustainable travel. To support any future application, the Transport Statement will also need to consider deliveries, refuse vehicle schedules and access/egress for emergency vehicles within the site by providing supporting turning radius drawings.

The applicant will want to consider a demolition and construction traffic generation within the scope of the transport statement, as such a Demolition and Construction Traffic Management Plan (DTMP & CTMP) is recommended.

The DTMP should include a demolition schedule, measures for the control of vehicle and pedestrian movements, including full or partial road closures, to ensure the safety of the public, and the continued safe and effective operation of the road network and debris disposal detail.

The CTMP should include:

- a. Parking for vehicles, site personnel, operatives and visitors
- b. Expected levels of staff and any shift work
- c. Expected trip generation for the construction period
- d. Loading and unloading of plant and materials
- e. Storage of plant and materials including hoarding details
- f. On-site turning for construction vehicle
- g. Vehicle Routing and tracking
- h. Measures to prevent the deposit of materials on the highway
- i. A pre-commencement and post-construction survey of the existing highway to be undertaken and agreed by the CHA
- j. a commitment to fund the repair of any damage caused

The development site lies close to the Pembrokeshire Marine Special Area of Conservation (SAC). The proposal may have implications for the designated sites features and as such the Local Planning Authority must undertake a test of likely significant effect (TLSE) of the proposal. As such any future application must demonstrate that there will not be a significant effect, either alone or in combination with other plans and projects and consider all implications of the proposed scheme. The information required to carry out a TLSE and if necessary an Appropriate Assessment must be contained in with any application in the form of a Habitats Regulations Assessment screening report and Statement to Inform an Appropriate Assessment if applicable.

Ecological Impact – Habitats and Species

- An ecological assessment and /or survey will be required and must provide sufficient information to identify any nature conservation features (habitats/species) that are likely to be affected by the proposals and identify potential options for mitigation and enhancement. The likely impacts on any species protected under legislation (see below) and any direct or indirect impacts to species or habitats listed under the Section 7 list of the Environment Act (Wales) 2016 must also be considered. The survey must be carried out by a qualified ecological surveyor. It should include:
 - A Phase I habitat survey, to identify the quality and extent of the habitats present. Detailed habitat assessment should only be carried out between the months of April to September only. The habitat survey should also identify the presence of any invasive species. The report should identify the potential of the habitats on site for use by protected species.
 - Reptiles. Common species of reptiles may be present within suitable habitats. These are protected by legislation. The site must be assessed for its potential to support reptiles. Surveys for reptiles must be undertaken if suitable habitat is to be removed. These assessments must inform a code of construction practice for the proposed works with regard to reptiles.
 - Badgers and their setts are protected under The Protection of Badgers Act 1992. Activity within 30 metres of a sett may require a licence. A site may contain badger setts, it is recommended that the site and where possible surrounding land within 30m be surveyed for badgers.
 - Birds – the application must make an assessment of the bird populations currently using the application area and the impact of the development on these, in terms of loss of habitat and displacement.

- The site is adjacent to woodland/scrub. These features must be retained and integrated into any proposed future application and appropriately managed. There should be a buffer between any hedge/woodland and the development.
- All British bats are protected under European and UK legislation. Their presence is a material consideration when a local planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat. An assessment of any buildings for their potential for bat use should be carried out and reported in the PEA and a full bat survey of any buildings proposed for works or demolition should be undertaken in line with the guidance contained within the Bat Conservation Trust Bat Survey Guidelines. Mitigation must be provided as considered necessary based upon the survey findings. If the site is to be lit then bat activity surveys must be carried out

Any PEA report should also provide appropriate ecological enhancement in line with LDP policies and suggested measures implemented as part of the proposal design.

Further information on enhancements can be found within Pembrokeshire County Councils Biodiversity Supplementary Planning Guidance (SPG) https://www.pembrokeshire.gov.uk/objview.asp?object_id=9965&language=

A Green Infrastructure (GI) statement must be submitted with the application. This must be proportionate to the scale and nature of the development proposed and described how GI has been incorporated into the proposal. The GI Statement must demonstrate how well designed spaces can deliver multi-functional outcomes (e.g. biodiversity mitigation and enhancement, landscaping, SUDs highways drainage etc.)

Due to the presence of light sensitive bats nearby and the close proximity of the Milford Haven Waterway SSSI which is part designated for Greater Horseshoe Bats (which are light sensitive) a full street and external householder lighting scheme and lux diagram must be submitted with any application.

Overall, the proposed site plan appears to consider the inclusion of green space and biodiversity protection, mitigation and enhancement, however this will need to be clearly demonstrated with the submission of the above information should you be minded to submit a formal planning application.

The site comprises previously developed land. Prior to the construction of the hotel the land was used for military purposes. At present there is no DoE Industrial Profile for Military Land use and exact activities undertaken at the former base area unknown. Contamination could have resulted from accidental leaks and spills from equipment on site. There is therefore a potential for a range of contaminants to be present, especially hydrocarbons that are highly mobile. The building has also been subject to significant fire damage. Fire damage can lead to contamination of the ground by heavy metals such as arsenic, cadmium and lead along with any oils and solvents (melted or leaked from interior fittings and fixtures). It is unknown what firefighting methods were used at the time; fire water could have spread the contaminants if not properly contained. Residential use proposed highly vulnerable development and as such any planning application would need to ensure an appropriate assessment of risk posed by potential contamination is undertaken and mitigation measures are in place where necessary to ensure that there is no risk posed by potential contamination at the site.

In terms of drainage it would be expected that foul waste is directed to the main sewer system and that surface water is disposed by means of a sustainable drainage system (which has been indicated on the submitted plan). You will also require SAB approval in this instance.

As the proposal is for a development in excess of 24 dwellings it is considered to be large major development as defined by article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. As such there is a requirement to undertake pre-application consultation, as set out in part 1A of the DWPWO. You can find further guidance using the attached link:

<https://www.gov.wales/sites/default/files/publications/2018-10/development-management-manual.pdf>

No planning obligations would be required in respect of the proposed development.

Conclusion

The principle of affordable residential development is acceptable and would be supported.

I hope this answers your query. Please note that this information is given on an informal basis and without prejudice.

Please direct all correspondence in this matter to Claire Jenkins.

Yours sincerely

C Jenkins

DEVELOPMENT MANAGEMENT SECTION