

PLANNING STATEMENT AND JUSTIFICATION REPORT

DEMOLITION OF REDUNDANT DERELICT HOTEL AND REDEVELOPMENT WITH 35 AFFORDABLE HOUSING UNITS WITH LANDSCAPING AND ECOLOGICAL ENHANCEMENTS

FORMER CLEDDAU BRIDGE HOTEL, ESSEX ROAD, PEMBROKE DOCK, PEMBROKESHIRE, SA72 6HZ

11th September 2024



Aerial Photograph of Application Site in Context



Former Cleddau bridge Hotel Site

Major Application for Planning Permission Town and Country Planning Act 1990

Head of Planning – Ms Harriet Lavender
Pembrokeshire County Council
County Hall
Haverfordwest
Pembrokeshire
SA61 1TP

HAYSTON DEVELOPMENTS & PLANNING LTD is making an application on behalf of our client, Castell Group Ltd, for the following planning permission:

1. **Proposal:** Demolition of redundant derelict hotel and redevelopment with 35 affordable housing units with landscaping and ecological enhancements
2. **Site location:** Former Cleddau Bridge Hotel, Essex Road, Pembroke Dock, Pembrokeshire, SA72 6HZ
3. **Type of Planning Permission:** Full
4. **Relevant LDP Policies:** SP1, SP 8, SP.12, SP.13, SP.14, GN.1, GN.2, GN.3, GN.26, GN 28, GN.37 and GN.38
5. **Local Supplementary Planning Guidance (SPG):** Biodiversity (2014); Parking Standards (2013); Affordable Housing (2015); Planning Obligations (2016).
6. **Relevant National Guidance:** Planning Policy Wales (PPW), Edition 12, February 2024 and Future Wales: The National Plan 2040
TAN's 2 – Planning and Affordable Housing (2006); 5 – Nature Conservation and Planning (2009); 12 – Design (2016); and 18 – Transport (2007).

• INTRODUCTION

1.1 Please find enclosed the following supporting information:

- This document - **Planning Statement and Justification Report**
- **Application Form and associated certificate of ownership**
- **Drawing R 594 P 01** – Development Site Services and Site Constraints Plan @ Scale 1:500
- **Drawing R 594 P 02A** – Proposed Site Layout Plan @ Scale 1:250
- **Drawing R 594 P 03** – Plot Size and Boundary Treatment Plan @ Scale 1:500
- **Drawing R 594 P 04** – Site Sections and Street Elevations @ 1:200
- **Drawing R 594 P 05** – 3D Views and Map Key (not to scale)
- **Drawing R 594 P 06** – Domestic Lighting Plan @ Scale 1:250
- **Drawing R 594 P 07** – Proposed External Finishes Site Plan @ Scale 1:250
- **Drawing R 594 P 08** – Proposed External House Type Finishes (not to scale)
- **Drawing R 594 P 09** – Typical Garden Arrangement Plan (not to scale)
- **Drawing R 594 10** – 2P1B Detached Flats @ Scale 1:100 and 1:50
- **Drawing R 594 11** – 2P1B Semi Detached Flats @ Scale 1:100 and 1:50
- **Drawing R 594 12** – 2P1B Semi Detached Gable Entrance Flats @ Scale 1:100 and 1:50

- **Drawing R 594 13** – 4P2B Semi Detached House @ Scale 1:100 and 1:50
 - **Drawing R 594 14** – 4P2B Terraced House @ Scale 1:100 and 1:50
 - **Drawing R 594 15** – 5P3B Semi Detached House @ Scale 1:100 and 1:50
 - **Drawing R 594 16** – 6P4B Semi Detached House @ Scale 1:100 and 1:50
 - **Drawing R 594 S 01** – Site Location and Topographic Survey @ Scale 1:1250 and 1:500
 - **Appendix A** - Design and Access Statement
 - **Appendix B** - Planning Decision Notice dated 22 May 2018 and associated Planning Committee Report (reference 17/1285/PA)
 - **Appendix C** – Planning Decision Notice dated 24 February 2023 and associated Planning Committee Report (reference 22/0510/PA)
 - **Appendix D** – Social Services and Housing Cabinet Meeting Report dated 22 April 2024
 - **Appendix E** – Pre-Application Planning Advice Enquiry and Form dated 3 May 2024
 - **Appendix F** – Pre-Application Planning Advice Enquiry Response dated 5 June 2024
 - **Appendix G** – Welsh Government Technical Review Submission – Pre-Planning Application Stage Addressing Areas/Items Highlighted for Action at Concept Stage dated August 2024
 - **Appendix H** – Transport Statement by Apex Transport Planning dated August 2024
 - **Appendix I** – Preliminary Ecological Appraisal Report by I and G Ecological Consulting dated April 2024
 - **Appendix J** – Tree Survey and Tree Protection Plan by Treescene Arboricultural Consultants dated April 2024
 - **Appendix K** – Landscape Strategy and Green Infrastructure Statement
 - **Appendix L** – Drainage Strategy – Details for SABs Approval by Phoenix Design dated August 2024
 - **Appendix M** – Site Investigation Survey – Geotechnical and Geoenvironmental Report by Terra Firma (April 2024)
 - **Planning Fee** – 35 x £460 = £16,100.00
- Note: An appropriate legal agreement will be submitted during the formal planning application process in respect of affordable housing including a mechanism to secure the tenure and mix of the dwellings to be provided.*

1.2 The application site comprises the site of the former Cleddau Bridge Hotel which is currently derelict following a serious fire in March 2019. The site lies on the far northern edge of Pembroke Dock immediately to the south of the Cleddau Bridge which carries the main A 477 road.

1.3 A planning application for the demolition of the hotel and siting of a residential care home and linked bungalows was submitted in October 2022 and which was subsequently granted permission in February 2023. This permission, whilst in outline, is still live and allows for the loss of the hotel use of the site and its alternative redevelopment as a residential care home.

1.4 The site remains vacant and lies in a derelict state and continues to be a blot on the landscape and in need of redevelopment and significant investment. The site has now been purchased by Castell Group Property Specialists who specialise in delivering much needed affordable housing in South Wales and have undertaken a joint development deal with Pembrokeshire County Council (PCC) and that deal was agreed back in April 2024.

1.5 This application proposal involves the provision of 35 affordable housing units on the site together with various associated works, landscaping and biodiversity enhancements.

1.6 The development proposal has already been the subject of a Pre-Application Advice Enquiry with the Local Planning Authority in May 2024. This Enquiry sought to clarify some key planning issues and we have taken on board the initial feedback given by Officers with some revisions having been made to the proposal prior to this PAC submission. Further feedback would be welcome from Officers to this revised proposal as part of the PAC process, particularly in relation to housing mix and need.

1.7 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).

1.8 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.

1.9 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 has also been prepared which is attached at **Appendix A** to this Statement.

2.0 LOCATION AND SITE DESCRIPTION

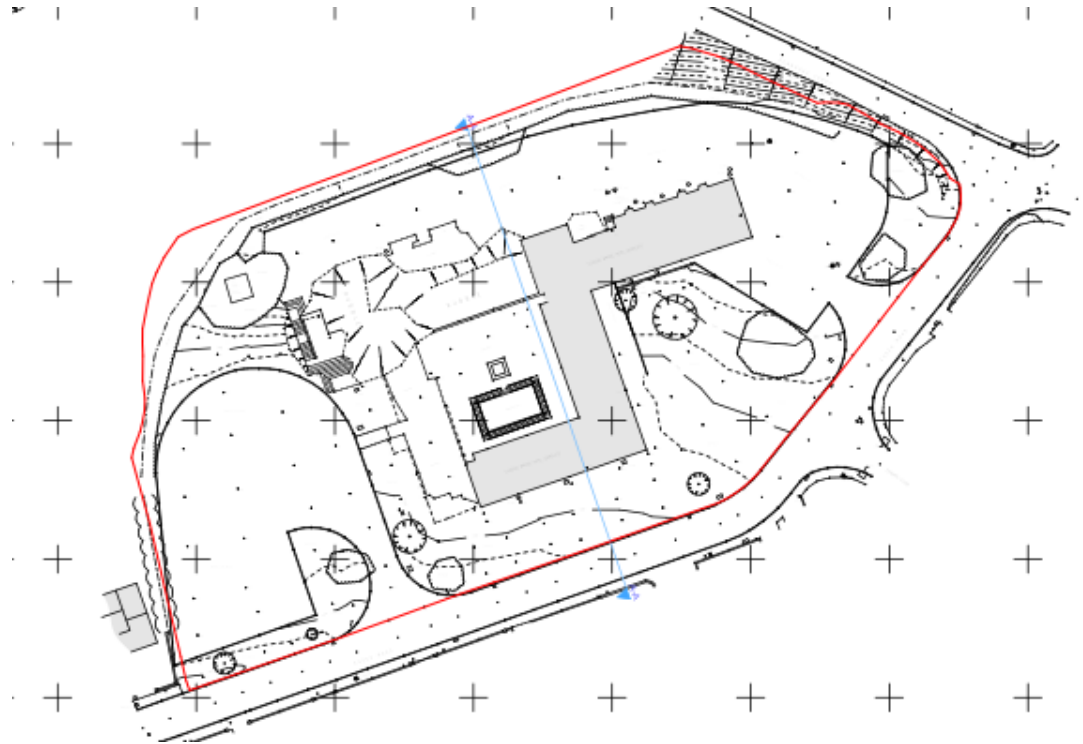
2.1 The application site comprises the site of the former Cleddau Bridge Hotel which is currently derelict following a serious fire in March 2019. The site lies on the far northern edge of Pembroke Dock immediately to the south of the Cleddau Bridge which carries the main A 477 road.



Site Location Plan and Aerial Context Plan– Drawing R 594 S 01

2.2 The remaining hotel buildings are two-storeys and part single-storey in height and of facing brickwork and render walls under plain concrete tiled roofs. The buildings are broadly centrally located with car parking areas located to both the western and eastern parts of the site, each served by separate vehicular access point from Essex Road.

2.3 In addition to the remaining hotel buildings, there are areas of rubble and hardstanding, amenity planting and some semi-improved grassland. The site frontage to Essex Road is largely open with clear views of the site with only grassed areas and some intermittent vegetation. There are a few trees within the site and there are hedgerows along the side and rear boundaries of the site.



Existing Site Layout Plan – Drawing R 594 SK-01

2.4 The Essex Road leads off Ferry Road and its junction with the A 477 further to the north-east. Essex Road is subject to a 20mph speed limit and there are no parking restrictions in the road.

2.5 The topography in the area varies such that levels fall away to the north and towards the Cleddau Estuary. There is also a slight fall in levels across the road from west to east, with part of the remaining buildings sitting slightly below the level of Essex Road. There is some woodland to the north of the site. Notwithstanding the presence of some woodland, this is on lower ground, there are views of the site from the Cleddau Bridge and Neyland across the Estuary to the north.



Existing Site Condition and Appearance

2.6 To the east of the site there is the Pembrokeshire Ferry Road which leads down to some residential development and the Ferry Inn located under the Cleddau Bridge. To the east is also a small public car park and associated picnic area on some open and amenity land. There is a public footpath (No. SP 32/38) which passes close to the north-western corner of the site and which connects Connaught Way with Pembroke Ferry Road through the adjacent woodland.



Existing Public Car Park and Amenity Open Space

2.7 The immediate area is residential in character, with housing development on the opposite side of the road and to the west of the site. These developments include various cul-de-sacs including Cenarth Close

and Devonshire Road to the south and Connacht Way to the immediate west of the site. The housing is generally suburban in nature with predominantly detached properties of modest proportions and varied styles. However, further to the west on the opposite side of Essex Road are two-storey blocks of flats at Kent and Dorset Row.

3.0 RELEVANT PLANNING HISTORY

3.1 The site has a long-established use as a hotel, but which was the subject of a serious fire in March 2019 and has remained vacant and derelict ever since.

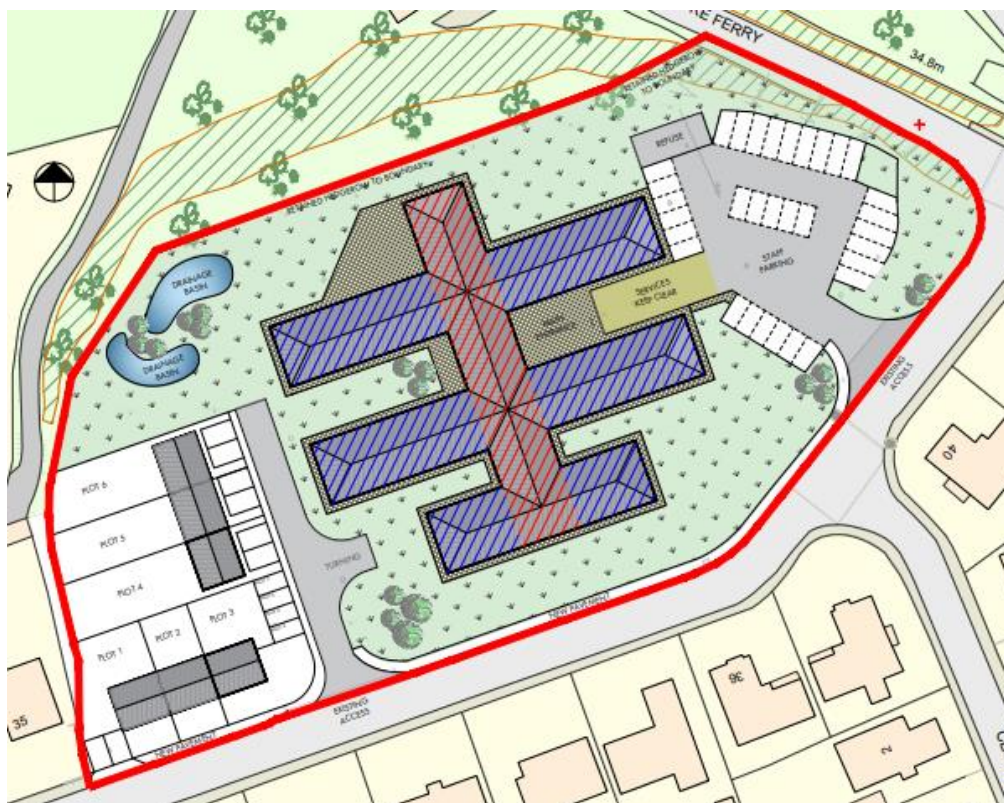
3.2 The only planning history of note relating to the hotel use itself was for an extension to provide additional facilities and 16 additional bedrooms. This application (reference 04/1571/PA) was granted permission in August 2004.

3.3 In 2017 an application was submitted for the change of use of the hotel to a 48-bedroom care home. This application (reference 17/1285/PA) was granted permission in May 2018. A copy of the Decision Notice and Committee Report are attached at **Appendix B**. The application made use of the existing vehicular access arrangements although some of the car parking was to be rationalised. The proposal did not involve any external alterations to the building. The existing buildings had a footprint of some 1,700 sqm.

3.4 The Council accepted the principle of the development was acceptable, lying within the defined settlement boundary and the hub town of Pembroke Dock and was in a sustainable location. The applicants were able to justify the need for additional care accommodation in the locality and that the proposal would achieve positive social and economic impacts. There was no objection to the loss of the existing hotel use.

3.5 In October 2022, a planning application was submitted for the redevelopment of the site and the siting of a residential care home and linked bungalows. This application was (reference 22/0510/PA) was granted permission in February 2023. A copy of the Decision Notice and Committee Report are attached at **Appendix C**.

3.6 The application was submitted in outline form only with all matters reserved for future consideration. However, an indicative site layout plan was provided which showed the main care home positioned centrally within the site with linked bungalows comprising six units accommodated in two terraced blocks located in the western part of the site. Minimum and maximum scale parameters were also provided, with the main care home building indicated to have an overall ridge height of between 8-10 metres. The indicative plan showed two points of access, one of which would serve the main care home and the other the independent units. The indicative plan detailed parking, landscaping and drainage arrangements.



Approved Site Layout Plan – Application Reference 22/0510/PA

3.7 The proposal sought to establish the provision of specialist and supported elderly accommodation to serve the Pembroke Dock area. Some 55-70 beds were indicated to be provided. This increased the size and extent of accommodation to be provided when compared with the previous approval. The applicant's agent explained that planning permission has previously been justified for a care home in this location, through the change of use of the former hotel (reference. 17/1285/PA), and had the building not been fire damaged the permission would have been implemented. There had been no change in circumstances for the need for the facility.

3.8 The Council concluded that, subject to final detailed design, the scale, nature and impact of the proposed redevelopment of the site was acceptable and was compatible with the capacity and character of the site and the area within which it is located. The impacts upon highway safety, residential amenity, ecology and infrastructure were also deemed acceptable.

3.9 This permission remains extant and could still be implemented. However, this is unlikely to materialise given the recent change in ownership of the site and the alternative proposal now being put forward to the Council and which would provide a significant opportunity to boosting the provision of affordable housing in the area. As has been previously highlighted elsewhere in this submission, the application comprises the development of a package deal between the site owner/developer and the Pembrokeshire CC for the provision of much needed affordable housing on the site.

4.0 SOCIAL SERVICES AND HOUSING CABINET MEETING

4.1 The site has now been purchased by Castell Group Property Specialists who specialise in delivering much needed affordable housing in South Wales and have undertaken a joint development deal with

Pembrokeshire CC. On 22nd April 2024, a PCC Cabinet Report was released by the Director of Social Services and Housing in relation to Housing Delivery entitled '*Development of a Package Deal for the provision of affordable housing in Pembroke Dock*'. This document is attached at **Appendix D**.

4.2 Since this time extensive research/information gathering has been undertaken by Castell Group Property Specialists in order to evaluate and design a viable housing scheme for delivery on this site.

4.3 Key aspects of the Cabinet Report was set out as part of a Pre-Application Planning Advice Enquiry to the Planning Department of the Council dated 3 May 2024. The purpose of the Report was to inform the Cabinet of a proposal to enter into a package deal contract (which included both an acquisition of land and construction works), for the delivery of some 38 new homes for social and affordable housing. The overall conclusion of the Report was as follows:

Conclusion:

An opportunity of increasing the pace of housing delivery into the Housing Revenue Account has presented itself through this potential Package Deal. The need for affordable housing in the development area is significant and if the Council were to proceed with the package deal, it would help the Council to meet housing demand in the area and the corporate priority of increasing the Council's stock of affordable housing.

4.4 The recommendation was subsequently agreed by the Cabinet

5.0 PRE-APPLICATION PLANNING ADVICE

5.1 Following on from the Cabinet resolution to proceed with the contract package deal, a Pre-Application Planning Advice Enquiry was submitted to the Planning Department of the Council dated 3 May 2024. This is attached at **Appendix E**. This submission included a set of drawings, including a draft Site Layout Plan, showing the provision of 37 two-storey units of houses and flats with an indicative mix of 18 x 1-bedroom units, 13 x 2-bedroom units and 6 x 3-bedroom units with a mix of social rent and affordable housing.

5.2 The proposed layout made use of the existing vehicular point located towards the eastern part of the site; housing facing the road and some further housing located on either side of an internal access road and turning head; the provision of a possible area of public open space (centred around a significant retained tree); sustainable drainage, and the retention of boundary hedgerows. The draft Plan is provided below for information:



Draft Site Layout Plan – Drawing R 594 SK P 04A

5.3 The Pre-application Planning Advice/Enquiry highlighted some of the key benefits of the proposal and sought the initial feedback from Officers on certain issues and any further information which may be required in any future formal planning application.

5.4 The Officers response was received in a letter dated 5 June 2024. This is attached at **Appendix F**. The overall conclusion of Officers was that the principle of affordable housing was acceptable and would be supported. Other key comments received are summarised below:

- Having regard to local housing policy GN 26 it advised that the proposal would equate to a building density of 30 dpha (on a stated site area of 1.24 ha) which would be appropriate to the site and be acceptable.
- Whilst the pre-application enquiry detailed the size of dwellings to be provided, it advised that any planning application should 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 and that property types should reflect the identified need for bedroom sizes within the Local Housing Market Assessment.
- The proposed layout and pattern of development would be in-keeping with the surrounding housing developments and character of the locality. Appropriate landscaping would be incorporated into the development.
- It would appear from the indicative layout plan that there would be no direct overlooking or loss of privacy from the proposed development and the dwellings would be adequately separated on site.

- The indicative plan shows that some of dwellings (units 1-19) would be directly accessed from Essex Road, with the highway being used for turning. It was advised the design and accesses fronting the carriageway would be similar to the existing nearby residential properties and subject to the required visibility splays being in place, these arrangements are considered acceptable.
- The previously formed access near to the eastern boundary off Essex Road would be re-used for the remainder of the proposed development and that the existing footway is shown to continue across the full frontage and into the site is welcomed. However, it advised that further design details are required such as in terms of sightline visibility, dropped kerbs and tactile paving (see Transport Statement)
- In relation to the internal road layout, it advised that swept path analysis plans should be provided to show that the layout would be suitable for service vehicles (see Transport Statement)
- It advised that the site fell within parking zone 4 and that the level of parking provided was within the guidance standards. However, it recommended that two visitor spaces be provided within the site to avoid any injudicious parking on the pavement (these have been provided).
- The proposed plan appears to consider the inclusion of green space and biodiversity protection, mitigation and enhancement. However, it advised this would need to be demonstrated in any formal planning application (see Ecological Appraisal and GIS).
- The site is adjacent to woodland/scrub and these features should be retained and integrated into any proposed future application and appropriately managed. There should also be a buffer between any hedge/woodland and the proposed development (Shown on the submitted drawings)

5.5 On a more general point, it provided advice on the type a breadth of information that should be provided in the support of any future formal planning application, and to meet validation requirements. These requirements included the submission of a transport statement; appropriate ecological surveys and assessments, including potential impacts upon the nearby Pembroke Marine SAC, recommended biodiversity enhancements and Green Infrastructure Statement (GIS), and a full street and external lighting scheme and lux diagram.

5.6 It advised the application site comprises previously developed land but prior to the construction of the hotel, it was used for military purposes and the building has been the subject of fire damage. Therefore, there is the potential for a range of contaminants to be present on site. As residential use is a more vulnerable use, it advised that an appropriate risk assessment be submitted as part of any formal planning application (See Site Investigation Report).

5.7 In terms of drainage, it advised it expected that foul waste is directed to the main sewer system and that surface water is disposed of by means of a sustainable drainage system (which was indicated on the submitted plans) and that SAB approval will also be required (See Drainage Strategy).

5.8 Finally, it advised that no planning obligations would be required for the proposed development.

5.9 In terms of the more detailed housing aspects of the proposal, attached at **Appendix G** is a Concept Stage Feedback to RSLs and Las which is also provided for information.

6.0 REVISIONS TO PROPOSAL

6.1 Since this initial response to the Pre-Application Planning Enquiry, the applicants have made some changes to the detailed layout and composition of the proposed development. Whilst the overall access arrangements and layout of the proposed development have broadly remained unchanged, some of the key changes have included the following:

- The overall number of residential units have been reduced from 37 to 35 units.
- The dwelling mix has been revised such that it now comprises 16 x 1 bed units, 11 x 2-bed units, 6 x 3-bed units and 2 x 4 bed units.
- A housing block located towards the western end of the site has been omitted and replaced by a foul water pumping station and an area of public open space to serve the development.
- A second housing block located towards the north-western end of the site has also been omitted and replaced by a swale/drainage rain garden.
- Some additional housing units, in two blocks, have been incorporated into the central part of the site.
- A single area of public open space has been replaced by four separated areas located around the development. However, a more informal grassed area remains in the vicinity of the pumping station. The overall public open space area has been reduced from 400 sqm to 303 sqm but these four formal areas are supplemented by other areas of open space, landscaping and required buffer zones. Space was also required to incorporate an appropriate sustainable system across the site. There is also a public picnic area located close by which could also be used by occupiers of the development.

6.2 In late July, we took the opportunity to seek clarification on certain issues surrounding the layout of the proposed development. In an email dated 26 July 2024, the Head of Planning advised the following:

- The 400 sqm open space provision must remain and that it would be useful to have some natural contouring that would allow an element of play.
- The gardens to plots 1-14 should be sloped to avoid some of the steeper profile and retaining wall. A shallower profile might allow for gardens to be extended to the retaining wall but with planting along the wall, otherwise it is suggested that this part of the development would be left with a strip of enclosed land that would be difficult to manage.
- It is suggested that the proposed pumping station looks large and question whether this is to serve just the development itself or also the wider area.

6.3 It is considered that the proposal comprises an acceptable layout of housing development. The area of open space has now been subdivided into separate areas and which allow for an element of play; the use and treatment of some of the rear garden areas have been clarified; and the proposed pumping station is deemed appropriate for the scale of development involved, although we would welcome feedback from Welsh Water on this particular aspect of the development.

7.0 THE REVISED PROPOSAL

7.1 This application involves the redevelopment of the now vacant and derelict former Cleddau Hotel with a development of 35 affordable housing units together with landscaping and ecological enhancements.

7.2 The proposal would the use of an existing vehicular access point off Essex Road located towards the eastern end of the site. An existing second vehicular access located towards the western end would be closed off with the existing pavement on this side of the road extended along the entire road frontage.

7.3 The proposed housing units would generally be sited facing the road frontage (units 1-21) with the other housing units (units 22-35) being sited at various points along the internal access road and within the rear part of the site.

7.4 The proposed housing units would generally be in the form of semi-detached two-storey blocks, although there would be a single terrace block located close to the site entrance. Some of the blocks would be in use as flats.

7.5 The site has an area of 1.05 ha (with a developable area of 0.95 ha) with the proposed development achieving a density of some 35 dpha.

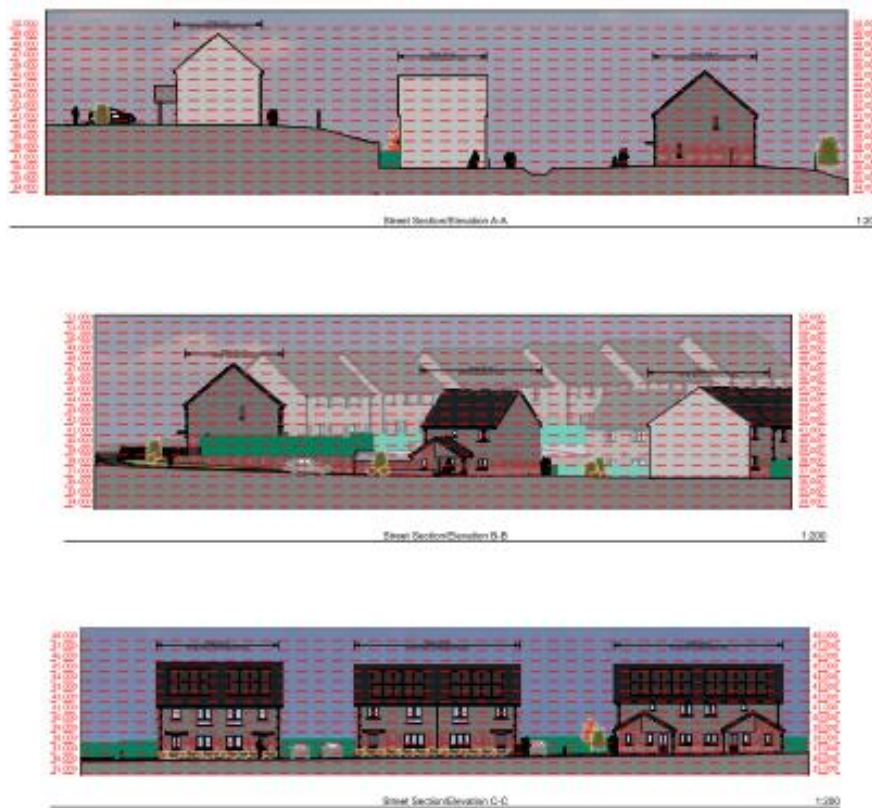


Proposed Site Layout Plan – Drawing R 594 P02A

7.6 The proposed highway works would be constructed to relevant highway design standards. This would include the provision of appropriate sightline visibility at the main site entrance, the provision of a turning head within the development site suitable for service vehicles, with pavements of suitable width and the incorporation of dropped kerbs and tactile paving where appropriate. The proposed car parking spaces would be directly related to the housing units they are expected to serve, with some being in tandem form. As in the earlier draft Site Layout Plan, the car parking serving housing units 1-17 would be directly accessed from Essex Road.

7.7 The amount and location of car parking would be appropriate to serve the proposed development, with two spaces being provided for each of the 2-4 bed properties and one space being provided for the 1 bed properties. In response to the Pre-Application Planning Enquiry, two additional visitor spaces have also been included into the layout.

7.8 The proposed layout, form and amount of development proposed seeks to work within the shape and constraints of the site, including the changes in levels which generally fall away in a northerly direction. Whilst the internal access road would generally follow the contours of the site, the proposed layout includes the incorporation of retaining walls over various parts of the site. These include to the rear of housing units 1-14, just inside the western boundary of the site and between the housing units on the eastern part of the site. These retaining walls would have the effect of creating two tiers of development, with that to the rear being on a lower level. This is illustrated in the following site sections:



Site Sections – Drawing R 594 P 04

7.9 As previously highlighted, the proposed housing size mix has been revised since the Pre-Application Planning Enquiry. The proposal comprises a mix of dwelling types – detached and semi-detached flats, and semi-detached and terraced houses, with a mix of 16 x 1 bed units, 11 x 2-bed units, 6 x 3-bed units and 2 x 4 bed units with their size ranging from 54 sqm to 111 sqm. Their distribution across the site is also indicated on the submitted Site Location Plan with a more detailed breakdown provided in the following schedule:

House Type Mix

- ## 16 x 2P1B Walk-up Flats - GN/OP.
Area = 54.0m² (Average)
- ## 11 x 4P2B Houses - GN/OM/Shared.
Area = 83.0m²
- ## 6 x 5P3B Houses - GN/OM/Shared.
Area = 94.0m²
- ## 2 x 6P4B Houses - GN
Area = 111.0m²

Total No Units = 35 Units

A series of submitted **Drawings R 594 P 10 to P 16** provide the floor plans and elevations of all dwelling types. These are provided below:



Detached Flats Plots 33-35 – Drawing R 594 P 10



Semi - Detached Flats Plots 7-10 and 24-27 – Drawing R 594 P 11

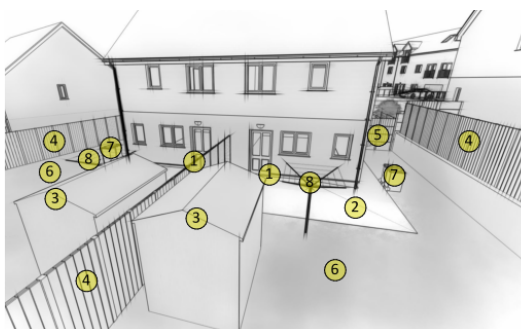


Gable Entrance Flats Plots 18-21 – Drawing R 594 P 12

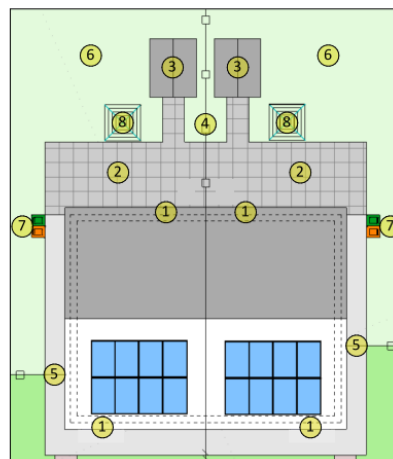
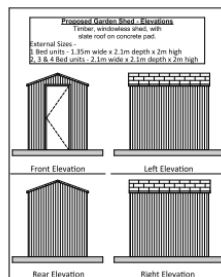


Use of Quality External Materials and Surface Treatments – Drawing R 594 P 08

7.11 Each of the proposed dwelling units would have the benefit of an outdoor amenity space, and although modest in size, they would be practical and private, with the buildings divided into flats having appropriately allocated areas. In view of the need to accommodate the difference in ground levels across the site, it is considered that the rear sections of gardens to units 1-14 would have to remain as steep banks and are to be appropriately landscaped to provide additional planting and biodiversity enhancements. Plot sizes would vary across the development deemed to be proportionate to the size/type of dwellings they are intended to serve – being listed on Drawing R 594 P 03. The drawing below shows a typical garden arrangement adequacy of the private amenity areas:



1. Level Access
2. 3m x 3m level patio area
3. SBD compliant shed (bike storage, etc.)
4. SBD compliant timber with concrete post fencing
5. Secure/lockable gate access
6. Grass Area
7. Bin storage
8. Drying line



Typical Outdoor Amenity Space to Dwellings – Drawing R 594 P 09

7.12 Within the western part of the site, the proposal includes a foul water pumping station with the route of a rising main located to the west of the proposed housing with connection into the main public sewerage system in Essex Road. This is deemed to be most logical location and such a system is required given the significant changes in levels across the site. This facility would only serve the proposed development. There would be a 15 metres diameter no build zone measured from outside of a 'wet well' together with a 6 metres easement zone to the rising main.

7.13 The application is accompanied by an extensive and robust landscaping and planting scheme. The only natural site features of note are the hedgerows which surround the site along its side and rear boundaries and the presence of a single mature tree within the site. These existing features are largely to be retained and supplemented by additional planting of various native species and type within the layout of the development. The proposal includes an ecological buffer zone centred on the boundary hedgerows together with a reptile and amphibian area close to the proposed swale feature as recommended in the Preliminary Ecological Appraisal.

7.14 The proposal includes four areas of open space spread throughout the development, including two areas within the site and two areas on the road frontage. The proposal includes a sustainable drainage feature in the form of a swale together with other infiltration features within the lower part of the site. Indeed, a significant part of the lower rear section of the site would be given over to areas of open space, planting and 'raingarden' areas.

7.15 The housing units facing Essex Road would generally have an open frontage, with extensive landscaping mitigating the impact of the proposed parking areas. Rear gardens would generally be enclosed by close boarded fencing. The frontage to Essex Road would generally be open with the use of simple post and rail timber fencing.

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

7.17 We understand there are existing infrastructure services available nearby, including mains water and electricity, with practical connections possible. The submission indicates a logical and practical connection of mains sewerage in the locality, with any final sewer connection arrangements to be clarified and agreed subsequently with Welsh Water.

7.18 In overall terms, the proposal would represent a high-quality residential development, appropriate to its location, and which would satisfactorily integrate into its surroundings. The proposal relates to a previously developed site. The proposal seeks to make the most effective use of the site for affordable housing, whilst having regard to its physical and known infrastructure constraints and its sensitive edge of town location with views across the Estuary.

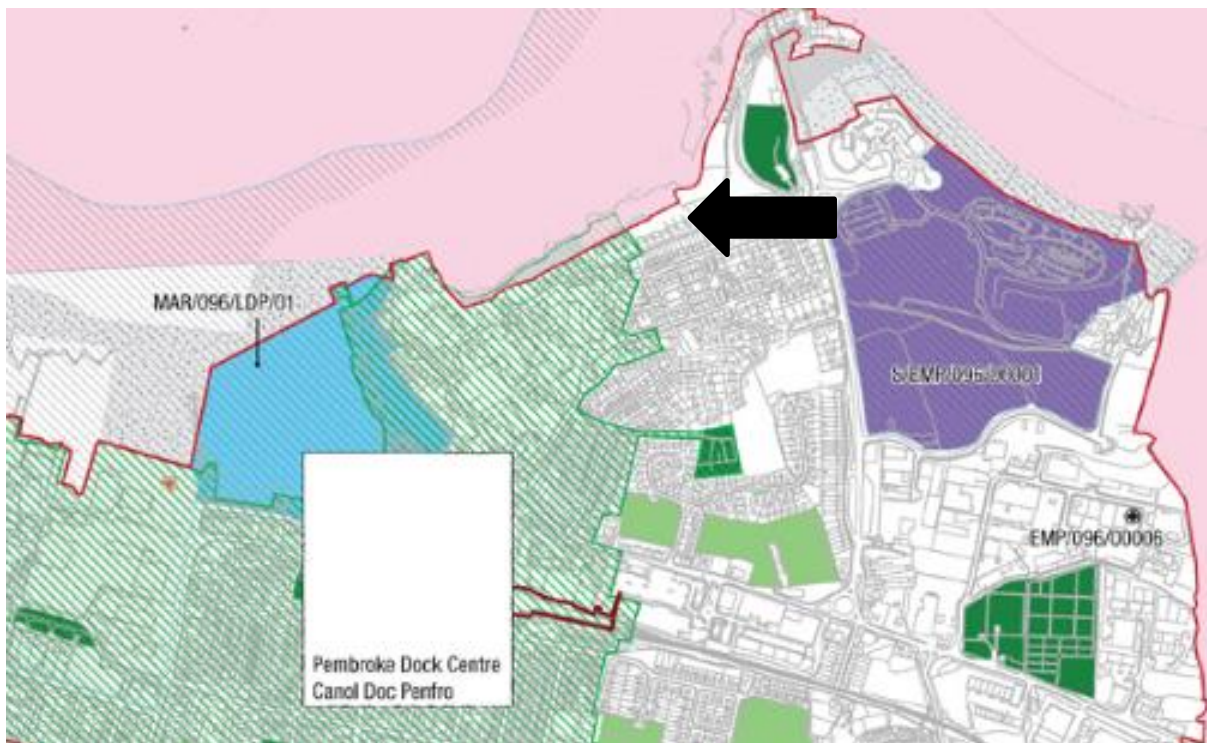
8.0 PLANNING POLICY AND GUIDANCE BACKGROUND

8.1 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
- SP8 – Affordable Housing Target
- SP12 – The Settlement Hierarchy
- SP13 – Settlement Boundaries
- SP14 – Rural Settlements
- GN1 – General Development
- GN2 – Sustainable Design
- GN3 – Infrastructure and New Development
- GN26 – Residential Development
- GN28 – Local Needs Affordable housing
- GN37 – Protection and Enhancement of Biodiversity

8.2 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.

8.3 The site lies within the developed area and settlement boundary of Pembroke Dock. The picnic area located to the north-east of the site is identified as an Amenity Open Space. The application site is indicated on the Inset Map for Pembroke Dock:



Adopted LDP1 Inset Map for Pembroke Dock

8.4 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. However, the Pembrokeshire Marine SAC and Haven Waterway SSSI lie some 115 metres to the north which would need to be taken into account in relation to the possible impact of the development upon the nature conservation interests of this area.

8.5 The County Council is in the process of working on a Replacement Local Development Plan (LDP2) for the area. However, the progress of this emerging Plan has been significantly delayed by the Covid epidemic and the possible implications for certain housing proposals in respect of the impact of phosphates on ecosystems and certain rivers. According to the Council's website, it is likely that a second Deposit Plan would need to be published and consulted upon. A new Delivery Timetable Agreement still needs to be agreed it is understood that a second Deposit Plan may be published in the Autumn 2024.

8.6 Given the stage reached in the LDP2 review process we consider that little if any weight can be given to the emerging Deposit Plan. Primacy should still be given to the adopted LDP1.

9.0 PLANNING POLICY ASSESSMENT

Principle of Development

9.1 Policy SP 1 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.

9.2 *Planning Policy Wales: Edition 12* (PPW) published in February 2024 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.

9.3 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.

9.4 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.

9.5 The site is situated in a sustainable location within a Hub Town therefore minimising the use of the private car and where public transport options are available nearby. Future occupiers of the development would also be within reasonable reach of the range of facilities, services and amenities available within the centre of Pembroke Dock itself.

9.6 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. The proposal would also make a significant contribution through the provision of affordable housing where there is an acknowledged need. Further, a mix of housing type and tenure is proposed and where affordable housing is a high Corporate priority.

9.7 The proposal would achieve economic objectives in providing employment in the construction industry. Given the size of the development, these benefits are likely to be significant.

9.8 The proposal would achieve significant environmental objectives in that it would involve the redevelopment of neglected previously developed land have full regard to the nature conservation interests of the site together with significant biodiversity enhancements. It is considered that the nature consideration interests of the nearby Pembrokeshire Marine SAC would at least be safeguarded.

9.9 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. There would be no impact of the nearby Amenity Open Space. The surrounding and wider landscape would also be protected.

9.10 Policy SP 12 sets out the Settlement Hierarchy, with Pembroke Dock being one of the five main Hub Towns within the County. It is a key service, employment and retail centre. Policy SP 13 states that Settlement Boundaries are shown for all settlements and define the areas within which development opportunities may be appropriate. The site is in such a location.

9.11 Policy SP 14 states that within Hub Towns, development will encourage sustainable communities and complimentary relationships between the Towns by promoting certain types of development. In this case, the proposal would provide high-quality accommodation that supports diversity in the residential market and would reinforce the role of the town in the County.

9.12 The proposed development aligns with the Local Development Plan requirements for new housing given the site's location and which seeks to see 60% of developments in urban areas. Pembroke Dock, being a Hub Town, has the highest priority for development. Additionally, the site is brownfield land which is prioritised over Greenfield as it has been previously developed. It has also been in a derelict state for some 5 years. It is also a windfall site which means it has not been previously allocated for development, but unexpectedly has become available for residential development. Until the adoption of the LDP2, there are limited sites within the current LDP1 around Pembrokeshire that are within an urban area and those within the Pembroke Dock/Pembroke area have been difficult to bring forward during the Plan period.

9.13 Within the Pre-Application Planning Enquiry response in May 2024, the Officers confirmed that the redevelopment of the site for residential purposes was acceptable. Therefore, this background provides a very strong and favourable situation for the proposed development.

Housing Density

9.14 The proposal would comply with Policy GN. 26 in that it would involve the provision of 35 units of affordable housing to meet local needs, located within the Hub Town of Pembroke Dock.

9.15 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 25dpha rising to at least 30 dpha in towns. However, the policy indicates that in some circumstances a lower density may be justified. The proposal would achieve a density of 35dpha (based on a site area of 1.05 ha) and would therefore comply with the requirements of the policy.

9.16 The proposal seeks to work within the shape and physical constraints and opportunities presented by the site whilst respecting the character, appearance and setting of the locality. The proposal is deemed to represent an acceptable layout, scale and form of development.

Affordable Housing and Need

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

9.18 PPW requires Local Planning Authorities to *‘plan for a mix of market and affordable housing types to meet the requirement and specifically consider the differing needs of their communities.’*

9.19 Policy SP 8 sets out that at least 980 new affordable dwellings be provided over the Plan period. The supporting text explains that the need for affordable housing in Pembrokeshire is acute across the County and which is informed by various documents, including the Pembrokeshire Housing Strategy and the most up to date Local Housing Market Assessment (LHMA). This policy is now somewhat out of date.

9.20 Policy GN 28 states that local needs affordable housing will be sought on all housing developments. On unallocated sites, it sets out a certain percentage that should be provided on developments within either the Towns, Service Centres and Service Villages; Large Local Villages; and Small Local Villages. In Pembroke Dock, the percentage is set at 10%.

9.21 However, the current proposal is unique in that through a collaboration between the site owner/applicant and the County Council’s Housing Department, the proposal seeks 100% affordable housing on the site. This should be strongly supported by the County Council as LPA.

9.22 The Social Services and Housing Cabinet Report in April 2024 (see **Appendix D**) usefully sets out the housing policy position and the significant social benefits such a proposal would bring to the local area. The following key points can be taken from the Report:

- The Council has a corporate priority that aims to increase the supply of affordable and social homes and is seeking to expand its housing stock and satisfy local housing need. The site would help towards the Council’s 300 new home target and the Welsh Government’s 20,000 new homes target.

- The housing need in this area as shown by the Housing Register and latest draft LHMA 2023 confirms demand for social and affordable housing to be high with an additional impact also anticipated on the local housing market as a result of the Celtic Freeport. The Housing Register shows 806 people have selected Pembroke Dock/Pembroke in gold and silver banding need, which are the highest assessed need for housing including 701 applicants on the register that have Pembroke Dock/Pembroke as their current address (and hence have a local connection to the area). The LHMA 2023 over the next five years shows need for affordable housing in Pembroke Dock/Pembroke is 360 units made up of 290 social and 70 intermediate rent.
- The proposal is for a development programme of 18 months following planning permission being secured with a commencement date of March 2025 and completion by Autumn 2026. The speed of delivery is particularly attractive to the Council given in recent years the Council, when procuring its own contractors for residential developments, has experienced a lack of interest in the market.

9.23 The proposed size and type of housing proposed for the site has been set out earlier in this Statement. The mix has been slightly revised since the Pre-Application Planning Advice Enquiry.

9.24 The site will be a mix of social rent and affordable housing. Affordable housing comprises a range of options including but not exclusive to intermediate rent (which is lower than market rent but higher than social rent) and shared ownership/low cost ownership options. Allocations will be managed through the Choice Housing Policy which will include both the social and affordable housing options on the site.

9.25 The applicant's have presented a mix and type of housing that should meet the requirements of the Council's Housing Service. This is a collaborative proposal between the applicant/developer and further discussions can be held between with the LPA and the Council's Housing Service during the PAC process if required. A full Affordable Housing Statement can be provided as part of a future full planning application. However, further feedback would be welcome from the Council on this specific housing issue and to ensure that there is agreement prior to a formal submission.

9.26 To secure the affordable housing, an appropriate Unilateral Agreement and Certificate of title can be completed during the formal application process. This would include a mechanism to secure the tenure of the dwellings as affordable homes.

Layout, Scale and Design

9.27 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.

9.28 The proposal relates to a previously developed site which is currently occupied by a vacant and derelict former hotel. It currently represents a blot on the landscape. The site's redevelopment with a high-quality residential scheme would only represent a positive contribution to the local context and this sensitive edge of urban setting.

9.29 There would be no impact upon the setting National Park which is located some distance away from the application site. However, there are clear views of the site from the north, such as from across the Cleddau Bridge and from the other side of the Estuary, albeit from a distance. The site and the proposed development would be viewed within the context of the existing urban area and other residential development in this location. However, its impact would be partly mitigated by the existing screening

afforded by the adjacent areas of trees and woodland and additional landscaping proposed as part of the development.



Views towards the Cleddau Bridge and the Estuary

9.30 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 density of the scheme would meet the requirements of Policy GN 26 and its overall layout, form and spacing would fully reflect that of the surrounding development. The surrounding development is very much suburban in its form, with mainly detached dwellings set within regularly shaped and modest sized plots with dwellings positioned along local roads and cul-de-sacs.

9.31 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. The proposal relates to a previously developed site and benefits from an extant permission for a new care home on the site and the proposal seeks to reflect the existing pattern of residential development in the locality, such as that to the west and opposite the site.

9.32 The proposal would be appropriate to the local character and context, such as in terms of layout, scale, form, massing, height, design and appearance. The surrounding development is very much suburban in nature with limited spacing between dwellings and although predominantly two-storey in form there are examples of single storey and chalet style dwellings. The existing dwellings are modest in their scale and proportions with their style and external appearance being typical of Pembroke Dock and the wider locality. The proposal would simply reflect this existing pattern and form of development. However, there are a series of blocks of flats located further to the east along Essex Road which represent a departure from the typical townscape. Examples of the surrounding residential character is illustrated in the following photographs:



Form and Style of Housing in the Locality

9.33 The overall aim of the proposal is to present a high-quality design which pays due regard to local distinctiveness and is appropriate to its local context in terms of its layout, scale, form, siting, massing, height, architectural detailing and in the use of materials.

9.34 The proposal seeks to make effective and efficient use of the site for affordable housing whilst having regard to the constraints and opportunities presented by the site and local context and urban edge location.

9.35 The proposal seeks to make use of the change in levels across the site which fall away to the north, effectively creating two tiers of development. This reflects the existing residential development to the west of the site with dwellings facing Essex Road and those on lower ground to the rear along Connaught Way. The existing properties on the opposite side of the road are on higher ground and as such, with two-storey dwellings being proposed, this would continue the transition in the height of built development in the locality with the lower ground towards the Estuary to the north.

9.36 The proposed dwellings would be generally be semi-detached in form and appearance, although there are examples of detached and one terraced building incorporated into the layout of the development. Some of the buildings would be sub-divided into flats. Although this could be argued to represent a deviation from the existing built form found within the locality, the existing site and the previously approved redevelopment of the site as a care home already represented a deviation from the pattern and form of residential development.

9.37 The proposed layout comprises frontage development to Essex Road with some additional development on the lower parts of the site to the north. Use would be made of the one of the existing vehicular access points serving the site with this being extended to provide access into the site to serve other parts of the development. The proposal represents a logical approach to the redevelopment of the site.

9.38 The proposal would comprise two-storey traditional homes under pitched roofs together with the use of a mix of external materials in-keeping with the locality. The proposed dwellings would have a good degree of architectural detailing and features which would add visual interest and add to the overall quality of the development. The applicant has produced various 3D views of the proposed development which fully illustrates the high-quality of the proposed development and how it would make a positive contribution to the character and appearance of this part of Pembroke Dock:



3D Perspective Views of Proposed Development – Drawing R 594 P 05

9.39 Each of the proposed dwellings would have access to a suitable private garden area with a good level of privacy, enhanced by boundary planting. Whilst some of the garden plots would be modest in size, they are deemed to be practical and private and as part of the development, it is proposed to provide suitably located and accessible open space within the development. Occupiers of the development would also have access to the nearby public picnic area located nearby to the north-east.

9.40 Careful attention has been given to the layout of the development to ensure that there would be adequate separation between buildings and that there would be no significant overlooking or loss of privacy. For example, given the difference in site levels, there would be the potential for some overlooking from the dwellings on higher ground (units 1-17) to those on lower ground to the immediate north (units 32-35) any overlooking would be oblique and would not be unusual in housing developments.

9.41 The application proposal is accompanied by an extensive and robust landscaping scheme which not only assists in integrating the proposed development into the site and its surroundings but offers an opportunity to significantly enhance the biodiversity value of the site. The existing site is largely devoid of any significant natural features. The proposal retains the hedgerows along the side and rear boundaries

of the site, including an appropriate buffer zone to the proposed dwellings, and includes large areas of open space, verges and planting between plots. As such, the proposal would provide some useful and significant additional green infrastructure.

9.42 As such, the proposal would contribute to delivering well-designed outdoor space with good linkages to adjoining streets, spaces and other green infrastructure. In addition to the provision of outdoor space within the site, occupiers of the development would have convenient access to the nearby public picnic area and public footpath.

9.43 The proposal would provide a good quality and vibrant public realm that integrates well with adjoining streets and spaces. Parts of the proposed development would have dwellings directly facing Essex Road in-keeping with the existing pattern of development. The pavement would be extended, and the frontage parking arrangements have already been deemed to be acceptable by the Council.

9.44 The proposed dwellings would be constructed to current building standards and as such would be sustainable in terms of construction, the materials used and their thermal properties and water conservation. Indeed, the proposed dwellings would be built to Welsh Design Quality Requirements (WQDR) standard (which includes EPC A). WQDR standard is a minimum standard set by Welsh government for affordable homes.

9.45 Necessary and appropriate service infrastructure is available and appropriate vehicular access and parking can be provided. The submitted Transport Statement (see **Appendix H**) demonstrates the proposal would be acceptable in highway safety terms.

9.46 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.

9.47. 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 and high-quality development in accordance with relevant policy.

Neighbouring Amenity

9.48 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.

9.49 There are residential properties located to the west of the site and on the opposite side of Essex Road to the south and south-east.

9.50 To the west are the detached properties in Essex Road and Connaught Way. The nearest properties are located end on to the application site with the properties in Connaught Way being on lower ground to the rear. The nearest dwellings in the proposed development would be Units 1 and 2 which would be sited

such that their flank elevation would face the flank elevation of No. 35 Essex Road. This property is single storey with a garage on its side elevation and is separated by boundary hedging.



Side Elevation of No. 35 Essex Road

9.51 No. 18 Connaught Way is a detached property located further to the north and situated at the end of the cul-de-sac and is set at a sight angle to the rear north-western corner of the application site. It has a large car parking area on its frontage.



Front Elevation of 18 Connaught Way

9.52 This property is well screened from the application site by a dense hedge and it is unlikely that the proposed development would be visible from this property. The hedgerow is shown to remain as part of the development. In addition, the proposed dwelling would be sited well away from this boundary with the foul water pumping station and swale drainage feature being in closer proximity. It is not anticipated that the pumping station would lead to any noise issues.

9.53 The properties on the opposite southern side are on higher ground to the application site and have a clear view of the existing vacant and derelict former hotel site. Their outlook would clearly be altered by the proposed redevelopment of the site, with some views of the Estuary to the north being affected by a degree. However, there is no right to a view and there would be various benefits from the redevelopment of the site with a high-quality housing scheme. There would be adequate separation with a public highway in between to avoid any material loss of privacy. The frontage development relationship would be typical of the area.



Properties on higher ground on the opposite side of the road

9.54 The amenity of residents is currently affected by the current poor condition of the site and its previous commercial use as a hotel would have had an impact upon amenity. At present, it seriously detracts from this area and its redevelopment should be welcomed by the local community.

9.55 Therefore, the relationship between the proposed development and neighbouring buildings would be acceptable and amenity would be safeguarded.

Highway Safety, Parking and Accessibility

9.56 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.

9.57 In terms of accessibility, the site lies within a sustainable location, lying within an existing residential area and although on the northern edge of Pembroke Dock, has good access to a range of facilities, services and amenities in the centre together with good access to employment opportunities. There is good access to the surrounding area via the A 477 and there are public transport options nearby.

9.58 The proposal would involve the redevelopment of a brownfield land which was previously in use until about five years ago as a hotel. The site has the benefit of two existing vehicular access points and open car parking areas. This previous use would have generated a significant number of traffic movements onto the Essex Road.

9.59 The traffic movements to and from the site were also addressed as part of the previously approved application for the redevelopment of the site as Residential Care Home (reference 22/0510/PA). The Transport Assessment submitted as part of that application concluded that the traffic movements from the development would not represent a significant increase upon the local highway network.

9.60 The current application proposal seeks to make use of the eastern most vehicular access point into the site and subject to the provision of adequate sightlines being demonstrated, should prove to be adequate to serve the proposed development. The amount of traffic likely to be generated is unlikely to be significantly different from the previous use of the site as a hotel.

9.61 The application is accompanied by a Transport Statement which provides a comprehensive assessment of the proposal, including site connectivity, parking provision, access arrangements, road safety and vehicle trip generation. This document is attached at **Appendix H**. The main findings and conclusions are as follows:

- 6.1.4 The site is situated in a location where journeys by sustainable modes are a realistic alternative to the private car. The site offers the potential for access by walking, cycling and public transport. There are facilities, services, schools, and employment areas situated within suitable walking, cycling, and public transport distances via appropriate and safe routes, reducing the need to travel by car. The site is connected to Essex Road to the south which provide suitable routes to the surrounding area.
- 6.1.5 The proposals will also provide an improvement to the pedestrian environment through the provision of a footway along the site frontage on Essex Road. A further improvement will be made through the closure of one of the two site accesses, easing pedestrian movements along the site frontage.
- 6.1.6 The proposed car parking provision of 2 spaces per house and 1 space per flat is in line with parking standards and is considered appropriate to accommodate the likely demand generated by the site, without leading to overspill on the surrounding network.
- 6.1.7 Cycle parking provision will be provided at or above the minimum levels in the parking standards.
- 6.1.8 Obtained road safety data does not indicate an existing safety issue which would be exacerbated by the proposals and there is no evidence of a road safety issue on the key walking routes, or at the existing site access junction.
- 6.1.9 Trip generation analysis shows that the proposed residential use is forecast to generate a maximum of one vehicle on the local highway network every 3 minutes and 32 seconds on average, during peak hours. This is extremely robust as this does not consider the movements generated by the extant hotel use. The net change in movements in peak hours is likely to be minimal if considering the extant hotel use. The movements would not have a material impact on the operation of the highway and the site access junction would be appropriate to accommodate these movements.

9.62 Given the above considerations, we consider the proposal should be acceptable in highway safety and accessibility terms, and which would not have a material impact upon the on the operation of the highway network and should allow the County Highway Authority to provide a positive recommendation on the application.

Nature Conservation and Biodiversity

9.63 Policies 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.

9.64 The application is accompanied by a Preliminary Ecological Appraisal of the application site, which attached at **Appendix I**. The initial summary of the Appraisal is as follows:

The site comprises of the former Cleddau Bridge Hotel buildings in a derelict state, hard standing, amenity planting, semi-improved grassland and non-native hedgerows. Buddleja is present across the site, with pockets of laurel and cotoneaster. The site lies close to the Pembrokeshire Marine SAC & Milford Haven Waterway SSSI.

The site is a blank canvas, with scope for enhancement to create both habitat features and places for the residents to engage with nature. Implementation of the recommended enhancement measures should result in no negative impacts and deliver an enhanced environment.

9.65 Some of the main findings of the Appraisal can be summarised as follows:

- In terms of Statutory Designated Sites, there is the Pembrokeshire Marine and Haven Waterway SSSI some 115 metres to the north. Although there were several records of ancient woodland in the locality, none of these were in proximity to the development site.
- Over 60% of the site is occupied by derelict buildings, tarmac and concrete hardstanding.
- There was no significant risk of direct impact upon the Statutory Designated Sites from the development, although it recommends that a CEMP be developed to ensure that polluting matter does not find its way into the Haven as a result of the development.
- The site has low ecological value in relation to relevant guidelines although on-site habitats have the potential to support certain protected species, such as birds, bats, small mammals, invertebrates and reptiles.
- If the proposed development site is cleared without any mitigation for development, the impact on ecosystem resilience is expected to be minor.

9.66 The Appraisal makes several recommendations in terms of biodiversity enhancement measures, have been incorporated into the scheme. These are summarised below:

- The inclusion of bird and bat boxes integrated into the new build which should include swift and sparrow boxes.
- Bat boxes should provide for summer roost and breeding and winter hibernation.
- A pond and wetland should be constructed to take roof water, which would provide breeding habitat for amphibians and invertebrates such a dragonfly and damselfly.
- Areas of tarmac and hardstanding should be replaced with gravel to allow for groundwater infiltration.
- The creation of a reptile and amphibian hibernacular in an open location close to the pond and wetland.
- The appropriate treatment and management of any grassland, with perhaps an area given over to hay meadow, and landscaping to include flower bearing berries to encourage pollinators.
- The Leylandii and New Zealand broadleaf hedgerow should be removed from the site, with a native hedge bank planted together with some hedge bank trees.
- The incorporation of an appropriate external lighting scheme to minimise impact have regard to nature conservation interests. The external lighting is confined to low-level domestic lighting on the dwellings as illustrated on **Drawing R 594 P 06**.

9.67 As such, the proposal should be acceptable in ecological impact terms and by incorporating a wide package of biodiversity measures, along the lines suggested, would significantly enhance the biodiversity

value of the site. The enhancement and management recommendations can be secured via a suitably worded condition.

Trees and Woodland

9.68 The application relates to a previously developed site which is currently in vacant and derelict state. There are few natural features of any note within the main body of the site, with the most significant features being a couple of trees within the site and a dense hedgerow of varied quality along the side and rear boundaries of the site.

9.69 The application is accompanied by a Tree survey and Tree constraints Plan which is attached at **Appendix J**. The Survey covered a total of some 17 individual trees and several dense hedgerows and small tree groups along the side and rear boundaries of the site. With the exception of two trees of category B quality (Trees T 10 (Scots Pine) and T 17 (Whitebeam)) the other site features were of lower or varied quality.

9.70 Although there is no Tree Impact Assessment, it is clear the proposal would not result in any significant vegetation loss that would be harmful to the visual amenities of the locality. The proposal includes the retention of the boundary hedgerows together with some supplementary planting together with the retention of the Whitebeam tree which has some amenity value. Any loss of trees would be minimal and in any event, would be more than outweighed by the extensive new planting which forms part of a comprehensive landscaping scheme.

Landscaping and Green Infrastructure Statement (GIS)

9.71 The application proposal is accompanied by an extensive and robust landscaping scheme (see **Appendix K**). The details have been described and set out earlier in this Statement. A Green Infrastructure Statement is also attached at **Appendix K** which is deemed to comply with national policy requirements.

Drainage Arrangements

9.72 Policies GN 1 and GN 2 state that development will be permitted where it has the necessary service infrastructure, including power supplies, foul and surface water drainage and disposal and telecommunications.

9.73 The proposal includes the installation of an on-site foul water pumping station which would serve the development with mains connection being made to the existing public sewer system in Essex Road. A pumped system is required due to the change in ground levels in the vicinity of the site. This would be built to relevant Welsh Water requirements.

9.74 Surface water would be disposed of by means of a sustainable drainage system with the layout of the development incorporating a swale and 'rainwater garden' features. These would be soft SuDS features and would be largely confined on the lower and less developed rear part of the site. The proposed drainage arrangements are felt to be appropriate for the site in question with full details, including appropriate engineering drawings, are provided within **Appendix L**.

9.75 The application affects previously developed land which is largely covered by existing buildings and hardstanding areas. The proposal therefore offers an opportunity to improve the drainage conditions on site, which includes the introduction of significant areas of green space and additional landscaping.

9.76 Given the scale of development involved, and potential drainage implications, it is noted that the proposal would require separate approval from Pembrokeshire CC in its role as SuDS Approval body (SAB) prior to commencement of development.

Potential Contamination

9.77 Policy GN 1 states that development will be permitted where it would not cause or result in unacceptable to harm and public safety.

9.78 The proposal relates to a previously developed site and it has been highlighted that the site had been previously used for military purposes and as such, there were potential contamination risks. Whilst this issue was dealt with by condition in the previously approved application for the Residential Care Home (reference 22/0510/PA) this application is accompanied by a Site Investigation Report (Geotechnical and Geoenvironmental Report by Terra Firma). This document is attached at **Appendix M**.

The report states the following recommendations.

SECTION 10 Recommended Further Works

10.1 Recommendations

The following additional work is recommended:

- Trail pitting and/or window sampling following the demolition of the existing building and removal of underground services to aid further contamination testing and to confirm ground conditions.
- Deeper rotary boreholes in Area B to facilitate recommendations for pile design.
- Additional testing around WS04 and the area inaccessible to the initial investigation to refine the contamination to areas which may then be capped or removed.

Planning Obligations and Contributions

9.79 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.

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

9.81 Earlier in this statement we have already addressed the issues in respect of affordable housing and service infrastructure. In respect of service infrastructure, it is worth noting in respect of the previously approved application for the Residential care Home (reference 22/0510/PA) Welsh Water confirmed that there were no capacity issues in respect of foul water and that sufficient capacity existed at the Waste Water Treatment Works.

9.82 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.

9.83 We note that such a proposal may require the provision of informal play space of at least 400 sqm, for developments in excess of 33 dwellings. Such an area was included in the initial Pre-Application Planning Enquiry. However, the public open space has now been subdivided into four areas having a total area of 303 sqm. In their Enquiry response, the Officers indicated that the provision of an area informal open space be retained within the layout of the development and we consider the area of provision to be acceptable in this case, particularly given other public open space is easily accessible nearby. We consider the overall level of provision to be appropriate and acceptable.

9.84 The proposal includes a modest highway improvement in that the pavement on the northern side of the Essex Road is to be extended along the entire site frontage.

9.85 In their Pre-Application Planning Enquiry it was stated no planning obligations would be required in respect of the development. However, we would therefore welcome further clarification on this issue as part of the PAC process.

10.0 SUMMARY/CONCLUSIONS

10.1 This application relates to the redevelopment of the former and vacant/derelict Cleddau Bridge Hotel located on the northern edge of Pembroke Dock.

10.2 The background to the site and the proposal has been set out in this Statement and in the earlier Pre-Application Planning Advice Enquiry submitted to the LPA in May 2024.

10.3 The application proposal seeks the provision of some 35 affordable housing units on the site. The application offers an opportunity to find a solution to the redevelopment of the site, which has now been vacant and derelict now for some five years, and to make a significant contribution towards meeting the affordable housing needs of the area. The proposal is unique in that the scheme would be in the form of 100% affordable housing.

10.4 The LPA has already accepted the loss of the former hotel use of the site and for an alternative residential use, with planning permission having been given for a residential care home on the site.

10.5 The LPA has also accepted, through the Pre-Application Planning Advice Enquiry, that the principle and overall layout, form and amount of development proposed can be acceptable for this site and location. Therefore, it is considered that the main issues to be resolved essentially relate to the final details of the proposed development.

10.6 The proposal would represent a high-quality and sustainable form of development, which would achieve significant economic, social and environmental benefits, and which would make a positive contribution to the character of the area and this sensitive landscape setting. Significant biodiversity enhancements also form an integral part of the overall layout of the development.

10.7 The proposal relates to a previously developed site and its redevelopment should be welcomed by the LPA. The proposal seeks to strike the right balance between making the most effective use of urban land and providing a satisfactory layout and residential environment for the future occupiers of the development, whilst having due regard to safeguarding the amenity of neighbours.

10.8 There are not considered to be any technical obstacles to the development of the site, with basic service infrastructure being available nearby. However, a bespoke foul water pumping station is required to service the development.

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

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

10.11 The proposal is considered to have significant planning merit. Given these considerations, it is respectfully requested that full planning permission be granted for the development.

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

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RTPI

mediation of space · making of place

Appendices