

Date • Dyddiad 31st May 2022
Your ref • Eich cyfeimod RLHL/R534/PA-01
My ref • Fy nghyfeimod 21/0556/PR
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Pembrokeshire County Council Cyngor Sir Penfro

WILL BRAMBLE CBE.
Chief Executive / Prif Weithredwr

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Please ask for
Os gwelwch yn dda gofynnwch am

Mark Hyde

Rob Howell
RLH Architectural Ltd
16 Main Street
Fishguard
Pembrokeshire
SA65 9HJ

Dear Mr Howell,

Re: 21/0556/PR - Proposed residential development of 46 open market dwellings – land adjacent to Maes Ffynnon, Church Road, Roch, SA62 6BQ.

1.0 Introduction

1.1 I write with reference to the above and further to my discussions with Nick Cox. We had agreed that the advice would be provided in the context of a completed viability assessment. Unfortunately, as you know, the County Council is at present unable to provide that service and external advice is to be secured. Given the associated timescales, I am providing the following advice, but acknowledge that aspects may need to be reconsidered in the light of a completed viability assessment when it is available.

1.2 You have provided the following information:

- Application Form
- Supporting Statement & Appendices
- Site Location Drawing
- Site Topographic Drawing
- Site Constraints Drawing
- Feasibility Masterplan
- Drainage Strategy Drawing
- Engineering Strategy Drawing
- Proposed Access arrangements Maes Ffynnon
- Proposed Access arrangements Pilgrims Way
- Vehicle Tracking drawings

1.3 I have received advice from Highways Development Management & the LDP Team. I am also aware of pre-application advice in relation to the same site issued on the 30th July 2020

We welcome correspondence in Welsh and English, and will respond within a maximum of 15 working days. We will respond in the language in which the correspondence is received (unless you ask us to do otherwise). / Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg a byddwn yn ymateb cyn pen 15 diwrnod gwaith fan bellaf. Byddwn yn ymateb yn yr un iaith â'r ohebiaeth a dderbyniwyd (oni bai eich bod yn gofyni ni wneud yn wahanol).

For a copy in large print, easy-read, Braille, audio, or an alternative language, please contact Pembrokeshire County Council on the number above. / Os am gopi mewn print mawr, fformat hawdd ei ddarllen, Braille, sain neu mewn iaith arall, cysylltwch â Chyngor Sir Penfro ar y rhif uchod.

(reference PR/0469/19) which I understand you have also seen. Comments received in response to that request for pre-application advice has informed the following advice.

2.0 The Site

2.1 The site is a triangular area of land immediately to the north of Roch that covers approximately 2.19 hectares (5.4 acres). Residential development to the west, south and east consists of modern single and two storey detached houses whilst to the north is agricultural land. Roch Castle, a grade I listed building and a conspicuous landmark in the vicinity, is visible from the site and is approximately 0.5 kilometres to the east. The Pembrokeshire Coast National Park is located approximately 0.1 kilometres immediately to the north. Sections of the site appear to be unkempt whilst other areas form part of larger parcels of agricultural land. You have provided a topographic survey (ref ROC-HYD-XX-XX-DR-C-1200 Rev P01 dated 08/10/21) which shows the site dropping in height from the southern corner down to the north, with a pond and irregular levels on the western perimeter. There appear to be no significant physical site constraints to hinder development, albeit there is a public right way along the south western perimeter (reference no. PP80/36/1). The site is also located in an area subject to coal mining activity in the past.

3.0 Planning History

- PR/0469/19 – Pre application advice dated 30th July 2020.

4.0 Proposed Development

4.1 The submitted Feasibility Masterplan drawing illustrates the provision of 46 housing units on the site. It is indicated that the housing will be solely market provision, i.e. no affordable housing provision. The following mix of housing is proposed:

- 18 no. four bedroom detached houses
- 16 no. three bedroom detached houses
- 6 no. three bedroom semi-detached houses
- 6 no. two bedroom semi-detached houses

4.2 Two points of access are proposed. Maes Ffynnon will serve 18 units from the east and Pilgrims Way will serve the remaining 28 units from the west. There will be no internal vehicular link between Maes Ffynnon and Pilgrims Way, although a stepped pedestrian link is proposed. Detailed drawings illustrate proposed junction arrangements with the adopted highway and Maes Ffynnon which is currently unadopted.

4.3 The internal access roads are proposed to be a shared surface arrangement, albeit footways are also illustrated. Car parking provision appears to be at the rate of two spaces per unit and mainly on plot. There is no indication of garage or visitor parking provision. Retaining walls of up to 2.5 m in height will be necessary at certain points within the development given the site's sloping topography.

4.4 Several areas of Public Open Space are identified across the site, including a large centrally located area of some 446 sq.m. A 'Pembrokeshire hedgebank' is proposed to define the extent of rear gardens to the site's boundaries. Surface water is dealt with by means of a proposed SuDS arrangement. A large SuDS attenuation basin (695 sq.m plan area) is to be located immediately to the north of the site and a smaller basin (250 sq.m plan area) is located at the western end of the site adjacent to a proposed field access to agricultural land to the north. Foul drainage will connect to the existing system in Pilgrims Way. An existing pumping station on site will be decommissioned.

5.0 Planning Policy Context

5.1 The Local Development Plan (LDP) for Pembrokeshire was adopted in February 2013. It remains extant for the purposes of development management. The policies that are relevant to the proposed development are as follows:

- SP 1 Sustainable Development
- SP 12 The Settlement Hierarchy
- SP 13 Settlement Boundaries
- SP 15 Rural Settlements
- GN.1 General Development Policy
- GN.2 Sustainable Design
- GN.3 Infrastructure and New Development
- GN.26 Residential Development
- GN.27 Residential Allocations
- GN.37 Protection and Enhancement of Biodiversity
- GN.38 Protection and Enhancement of the Historic Environment

5.2 The site is identified as a housing site on the Proposals Map that accompanies the LDP (reference no. HSG/114/LDP/01) and to which Policy GN.27 is relevant. This policy identifies the site as “East of Pilgrim’s Way”, covering 2.19 hectares (5.4 acres) and with a minimum housing requirement of 44 units to be provided, of which an indicative affordable housing requirement would be 20%. The site is also within the defined Settlement Boundary of Roch.

6.0 Supplementary Planning Guidance

6.1 The following Supplementary Planning Guidance (SPG) would be given due weight in the determination of any planning application:

- Affordable Housing (September 2015)
- Biodiversity (May 2014)
- Development Sites (updated version December 2016)
- Parking Standards (June 2013)
- Planning Obligations (September 2016)

6.2 The Development Sites SPG has a brief section about the site (housing allocation HSG/114/LDP/01) and identifies no issues with regard to water provision, flooding, land contamination and electricity provision. It notes, however, that improvements are required with regard to the Waste Water Treatment Works serving the locality and the need for a developer to contribute to improvements. The SPG also notes, inter alia, that due to access constraints no more than 25% of any new housing should be accessed from Maes Ffynnon to the east, that there are existing parking and footpaths issues to be resolved; that the housing density should be less than 20 units per hectare to reflect access constraints and that there may also be a potential impact on a nearby Natura 2000 site.

7.0 Pembrokeshire Coast National Park

7.1 The boundary of the Pembrokeshire Coast National Park is in close proximity of the site to the north. We do not routinely consult with external bodies in the provision of pre-application advice and you should liaise directly with the Park Authority should you wish to secure its input.

8.0 Principle of Development

8.1 S38(6) of the Planning & Compulsory Purchase Act 2004 states that:-
‘If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.’

8.2 As noted above, the site is identified as a housing site on the Proposals Map that accompanies

the LDP (reference no. HSG/114/LDP/01). Policy GN.27 sets out the quantum of housing to be provided on the site as a minimum; and the proportion of that to be provided as affordable housing. You are proposing the provision of 46 housing units on the site which is a little above the minimum anticipated and is considered to be acceptable.

- 8.3 The Development Sites SPG also anticipates that the development will be served from two points of access, 25% of the housing via Maes Ffynnon, which is currently unadopted; and the balance from Pilgrims Way. The Feasibility Masterplan indicates that 18 units will be served via Maes Ffynnon or 39% of the overall housing proposed. Subject to securing the adoption of Maes Ffynnon and satisfying other detailed highways concerns (see below) this is considered to be acceptable.
- 8.4 Policy GN.28 - Local Needs Affordable Housing indicates that the proposed development would need to provide an on-site provision. Policy GN.27 - Residential Allocations identifies this allocated housing site (reference no. HSG/114/LDP/01) as accommodating 20% affordable housing requirement on the site. This would be a minimum of nine units from the proposed development. However, unfortunately, no affordable housing is proposed. Consequently, in the absence of material considerations that indicate why affordable housing cannot be provided, your proposal conflicts with the extant LDP and would not be supported by officers.

9.0 Other Matters

Drainage

- 9.1 All new developments of more than one property require sustainable drainage systems (SuDS) for surface water disposal and so is applicable to your proposal. SuDS must be designed and built in accordance with Statutory SuDS Standards published by the Welsh Ministers and SuDS Schemes must be approved by the County Council acting in its SuDS Approving Body (SAB) role, before construction work begins. Pembrokeshire County Council is the SuDS Approving Body (SAB) and as such the proposed works would require SAB approval prior to the commencement of any works on site.
- 9.2 A Drainage Strategy drawing has been supplied which should form the basis of pre-application discussions with the County Council as SAB. However, I do note that a substantial attenuation basin is proposed to serve the proposed development and which is situated outside of the allocated site. This approach will need to be explicitly justified in any future planning application submission.
- 9.3 You will also need to demonstrate that the site can be served by foul water drainage and as such you are advised to contact Dŵr Cymru/Welsh Water. If these issues are suitably addressed, it is considered that the proposal would accord with the requirements of Policy GN.1 in relation to service infrastructure and water quality.

Housing Mix

- 9.4 The extant LDP indicates at paragraph 116 that developers will be expected to demonstrate that they are providing a mix of housing types to cater for changing patterns in household size. The proposed development does not reflect recent evidence on housing market requirements in the local area (LHMA 2021) which would suggest greater proportions of 1 or 2 bed and 3 bed properties and fewer four bed properties than proposed. The specific housing mix proposed in any planning application should be justified by reference to up to date evidence.

Planning Obligations

- 9.5 Policy GN.3 Infrastructure and New Development indicates that development should fund any directly related need for new or improved infrastructure. Specific advice on how these

contributions are calculated can be found in the Council's SPG Planning Obligations (2016).

- 9.6 As the site's development would involve the construction of over 33 dwellings, you will be required to provide a minimum of 400 sq.m. of informal play space to meet on-site open space requirements. Ideally in a single central location. Roch is also currently deficient in all categories of open space when compared with the Fields in Trust standard. There will, therefore, be a requirement for contributions to off-site open space provision. Future maintenance costs will also need to be considered.
- 9.7 A Transport Statement in support of an application for this level of development is required in order to address multi-modal access issues. This would inform the need for financial contributions for highways infrastructure that may be necessary. Roch is reasonably well served in terms of transport links as it has the benefit of good bus links, a school, local shops etc. but any developer would need to identify how it is intended to connect the site to those facilities, in turn enabling decisions about what transport related infrastructure contributions may or may not be required.
- 9.8 Finally, you will be aware from the advice previously provided (PR/0469/19 dated 30th July 2020) that there are capacity issues at Ysgol Penrhyn Dewi and that contributions will be sought that will reflect pupil generation from the proposed housing mix.

Biodiversity

- 9.9 Policy GN.37 - Protection and Enhancement of Biodiversity states, amongst other things, that all development should demonstrate a positive approach to maintaining and wherever possible, enhancing biodiversity. Development that would disturb or otherwise harm protected species or their habitats will only be permitted in exceptional circumstances where the effects are mitigated through appropriate measures.
- 9.10 The site is within 2.3km of the Pembrokeshire Marine Special Area of Conservation (SAC) and just over 1.0 km away from the Cleddau Rivers SAC, to both of which there may be hydrological connectivity.
- 9.11 Under the Habitats Regulations, Pembrokeshire County Council as the competent authority must satisfy itself that there will be no adverse impacts on any SAC in terms of objectives and designated species. Therefore in the first instance, if required, a Test for Likely Significant Effect is undertaken (TLSE). If it cannot be determined through undertaking the TLSE that without mitigation there would be no effect, an Appropriate Assessment must be completed. This would assess the potential impacts of the proposed development on the designated sites alone and in combination with other plans and projects.
- 9.12 As such, notwithstanding issues with regard to the SACs, it is recommended that you engage an independent ecologist as there may be sensitive habitats on site that need to be retained and protected. The results of an ecological survey and discussions with an ecologist would help to inform you further about the design of the proposal and ensure there is no adverse impacts in terms of biodiversity. Furthermore, an ecologist could draw your attention to any requirement for surveys which need to be undertaken over a longer period of time. Please also note that under the Environment (Wales) Act 2016 there is a duty to maintain and enhance biodiversity in association with any development.
- 9.13 Any supporting information would be reviewed by the Council's Landscape Officer, Ecologist and Natural Resources Wales and assessed in accord with the requirements of Policy GN.37.

The Historic Environment

- 9.14 Policy GN.38 - Protection and Enhancement of the Historic Environment indicates that

development that affects sites of architectural and/or historic merit or their setting will only be permitted where it can be demonstrated that it would protect or enhance their character and integrity.

- 9.15 The site is located approximately 0.5 kilometres to the west of Roch Castle, a Grade I listed building and a conspicuous landmark in the vicinity. Having regard to the nature of the development, the topography of the area and the distances involved, it is not anticipated that the proposed development would have an impact on the setting of this listed building. There are no known issues of archaeological or historic importance associated with the site itself.

Highways & Access Arrangements

- 9.16 I am in receipt of the following detailed comments from Highways Development Management:

- i. Maes Ffynnon is not yet adopted as Highway, partly due to unresolved issues with the drainage and drainage easements. It is important that there are assurances given that the proposed surface water pond is made suitable for the existing estate road drainage.
- ii. Further to this, it is important that the developer realises that the extension to the estate road can only be adopted as Highway if Maes Ffynnon is first, or if they are included at the same time.
- iii. There should be a better detail of the junction alterations between the existing part of Maes Ffynnon and the proposed access. It needs to be a Give Way junction. We do not agree with introducing a 6.5 metre shared way from this point and will require a footway on this access road and around the first bend. The initial carriageway can be 5.5 metres, thus allowing for a better radius and visibility.
- iv. However, widening on the sharp bend, just before the first houses (plots 45 & 46) is still required.
- v. We cannot identify where a standards transformation to a shared way can be located, so this footway should therefore continue all the way to the proposed footway link through to the western part of the estate roads.
- vi. The detail for this link footpath is wrong, it needs to be ramped throughout, so no steps; and there needs a clear path through the parking courtyard, if estate roads are to be adopted or not; however, adoption will need to include a safe footpath route.
- vii. On the extension to Pilgrims Way there is the same problem with mixing carriageway with footway and then suddenly introducing a shared way where pedestrians have to step out into the carriageway. There needs to be traffic calming and a transition strip to make this safe.
- viii. Pilgrims Way widening. Carriageway widening can go on the Highway margin, subject to support to the grass bank. However, 5.5m will not allow two cars to pass each other. There does seem scope to widen more so that the back of the new footway will be on the PCC Housing boundary – a small retaining wall will be necessary.

- 9.17 You may need to discuss these detailed comments directly with Highways DM (Mike Harris – mike.harris@pembrokeshire.gov.uk – 01437 775437)

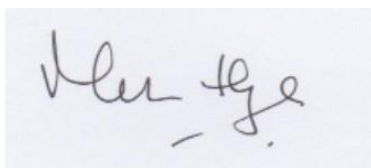
10.0 Additional Information

- 10.1 It is open to you with regard to submitting an application for outline planning permission or for

full planning permission.

- 10.2 You would, however, be required to undertake pre-application consultation prior to the submission of any application, in accordance with Article 1 of the Town and Country Planning (Development Management Procedure (Wales) (Amendment) Order 2016, as the development is for more than 10 dwelling houses.
- 10.3 Should you wish to proceed with the proposal, the following information would be required to validate an application:
- An application form;
 - Completed owner certificate on the application form;
 - Completion of the agricultural holding certificate;
 - A site location plan (at a scale of 1:1250 or 1:2500) with the site edged red and any adjoining land in ownership or control of the applicant edged in blue;
 - Elevations, floor plans and cross sections, as appropriate, at a recognised scale; and
 - A Design and Access Statement.
- 10.4 The fees for any application would depend on whether the application is for outline or full planning permission.
- 10.5 The outline fee is calculated by the site area £460.00 per 0.1 hectares or part thereof for sites up to and including 2.5 hectares.
- 2.19 hectares for housing = £10,120 (£460.00 x 22)
- The fee for an application for full planning permission is calculated by the number of new dwellings, not more than 50 - £460 per dwelling.
- 46 new dwellings = £21,160 (£460 x 46)
- 10.6 Any application would need to be determined by the Council's Planning Committee, due to the size of the site and the number of units proposed. It could not be dealt with by officers as a delegated item.
- 10.7 The above comments represent informal advice from an officer of the Council made without prejudice to the final determination of any planning application.

Your sincerely,

A handwritten signature in black ink on a light blue background. The signature appears to be 'Mark Hyde' written in a cursive style.

Mark Hyde
Principal Planning Officer