Planning Statement

Land South of Cleggar's Park, Lamphey

May 2023





Introduction	
Client	This statement has been prepared on behalf of Ateb Group.
Scope	This Planning Statement accompanies a Full Planning Application for a proposed residential development of 63no. new dwellings including 12no. affordable homes and 51no. market homes along with infrastructure, landscaping, amenity areas and other associated work on land south of Cleggar's Park, Lamphey.

Site Details

Site Location

Fig.1 Site Location Plan



Fig.2 Site Ariel View



Site Description

The Site comprises of a rectangular, managed agricultural field parcel, which is set back behind a line of houses along Freshwater East Road, at the southern end of the settlement of Lamphey. The broadly level Site extends to 2.4 hectares and is currently accessed via a farm gate from a short, unnamed, residential cul-de-sac from Freshwater East Road on the Site's western boundary.

The Site is bounded by residential development to the north and west, and agricultural land to the south and east. The dwellings either side of the Site access off Freshwater East Road consist of two-storey detached properties, with Cleggar's Park to the north comprising of two-storey detached properties and bungalows. The Pembrokeshire Coast National Park boundary lies immediately beyond the Site's southern boundary.

Vehicular access to the Site will utilise the existing access via the small cul-de-sac off Freshwater East Road, via the B4584. A separate pedestrian/cycle access will be provided from the site to Cleggar's Park to the north. The dwellings either side of the Site access off Freshwater East Road consist of two-storey detached properties, with Cleggars Park to the north comprising of two-storey detached properties and bungalows.

Development Proposals

The Scheme

The application seeks Full planning permission for the following:

- Residential development of 63no. new dwellings including 12no. affordable homes and 51no.
 market homes.
- New roads and footpaths, including a footpath link to Clegger's Park to the north.
- Drainage infrastructure.
- New green infrastructure/landscape planting.
- Ancillary works

Relevant Planning Policy

Approach

In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, development must be carried out in accordance with the development plan (in this case the adopted Cardiff Local Development Plan) unless material considerations indicate otherwise.

The Development Plan for the area comprises of the Pembrokeshire County Council Local Development Plan (Adopted February 2013) together with Future Wales – The National Plan 2040. Relevant material considerations in this instance are identified as including Planning Policy Wales, various Technical Advice Notes, and adopted Supplementary Planning Guidance.

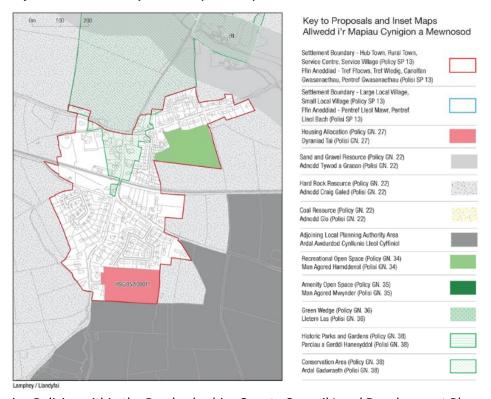
Local Development Plan

The adopted LDP establishes a Vision based development strategy and policies to guide the development and use of land in Pembrokeshire from adoption to 2021. It provides the policy context for directing development to appropriate locations, conserving the natural, built and historic environment and providing a basis for rational and consistent decision-making on planning applications.

The site is subject to the following designations within the adopted Local Development Plan:

- The Site is allocated for housing under reference HSG/052/00011
- Lamphey is considered a "Service Village".

Fig.3 Extracts of Pembrokeshire County Council Proposals Map



The following Policies within the Pembrokeshire County Council Local Development Plan are of most relevance to the development proposals:

<u>SP1 – Sustainable Development</u>

All development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised.

The overarching aim of the Plan is to ensure that Sustainable Development is achieved. This means ensuring that the types of development that take place are appropriate for their location and built and designed in such a way as to achieve positive economic, social and environmental impacts.

Policy SP7 – Housing Requirement

Provision is made for approximately 7,300 dwellings in the Plan Period, to enable delivery of 5,700 dwellings. The LDP housing requirement is derived from Welsh Government's 2008-based household projections. The household projections indicate that a total of 5,724 new homes are required from 2011-2021, at an annual rate of 572 per year.

Policy SP8 – Affordable Housing Target

The LDP outlines an affordable housing target of 980 new affordable homes. The need for affordable housing in Pembrokeshire is acute across the whole County and is informed by the Common Housing Register, the Pembrokeshire Local Housing Market Assessment (2012) and the Pembrokeshire Housing Strategy.

Policy SP10 – Transport Infrastructure and Accessibility

Improvements to the existing transport infrastructure that will increase accessibility to employment, services and facilities, particularly by sustainable means, will be approved and identified improvements to the existing transport infrastructure will be safeguarded.

In accordance with Planning Policy Wales and Technical Advice Note (Wales) 18, this policy identifies and safeguards proposed improvements to transport infrastructure that will support economic growth.

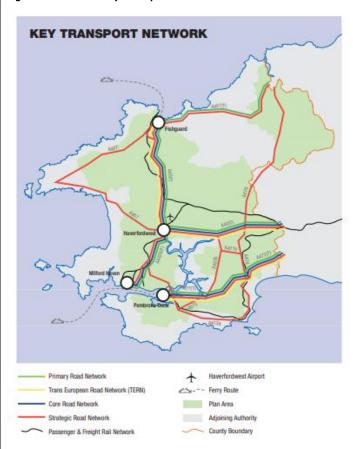


Fig.4 LDP Extract - Key Transport Network

Policy SP11 – Waste

Production of waste and its impact on the environment will be minimised and the use of waste as a resource maximised, through re-use, recovery for materials or energy and, where this cannot be achieved, safe disposal, using the best practicable environmental option.

Policy SP12 – The Settlement Hierarchy

The settlement strategy aims to distribute new development appropriately across rural and urban areas, using a settlement hierarchy that incorporates the principles of the Wales Spatial Plan. The settlement strategy aims to direct housing, employment and services to locations where people already live and work, in line with the Wales Spatial Plan and the settlement hierarchy.

A settlement hierarchy is defined on the basis of functional characteristics and availability of services and facilities, as follows:

Service villages

Lamphey

Those settlements with strong levels of community facilities are identified for growth in the settlement hierarchy.

Policy SP13 – Settlement Boundaries

Settlement Boundaries are shown for all settlements and define the areas within which development opportunities may be appropriate. Within Small Local Villages, Settlement Boundaries are defined indicating where local needs affordable housing will be permitted. In Hub and Rural Towns, Service Centres and Service Villages Settlement Boundaries define the physical, functional and visual extent of the settlement and take into account proposed allocations. Local Village Settlement Boundaries are defined more tightly, limiting opportunities to small scale infill and rounding off.

Policy SP15 – Rural Settlements

Within the Rural Settlements development will encourage sustainable communities and a thriving rural economy by promoting:

- 1. Development of a scale and nature identified as being appropriate for the settlement.
- 2. High quality accommodation of tenure(s) appropriate for the settlement.
- 3. Opportunities for new commercial, retail, tourism, leisure and community facilities.
- 4. Appropriate land uses which are well-related to a Settlement Boundary.
- 5. Greater accessibility to existing and new services.

Where appropriate sites are available, housing allocations for market and affordable housing have been identified in Service Villages

Policy GN1- General Development Policy

Proposals must respect the capacity of individual settlements to accommodate growth in terms of both scale and rate of development, and in relation to the settlement's position within the hierarchy.

Development will be permitted where the following criteria are met:

1. The nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and the area within which it is located;

- 2. It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels:
- 3. It would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities;
- 4. It respects and protects the natural environment including protected habitats and species;
- 5. It would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network;
- 6. Necessary and appropriate service infrastructure, access and parking can be provided;
- 7. It would not cause or result in unacceptable harm to health and safety;

Policy GN2 – Sustainable Design

This policy aims to raise the standard of design for all new development across the County in order to create attractive and functional buildings and spaces and to improve areas of poor design and layout.

Development will be permitted where relevant criteria are met:

- 1. It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context;
- 2. It is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout;
- 3. It incorporates a resource efficient and climate responsive design through location, orientation, density, layout, land use, materials, water conservation and the use of sustainable drainage systems and waste management solutions;
- 4. It achieves a flexible and adaptable design;
- 5. It creates an inclusive and accessible environment for users that addresses community safety;
- 6. It provides a good quality, vibrant public realm that integrates well with adjoining streets and spaces and
- 7. It contributes to delivering well designed outdoor space with good linkages to adjoining streets, spaces and other green infrastructure
- 8. It would not have a significant adverse impact on water quality; and
- 9. It would neither contribute to the coalescence of distinct settlements nor create or consolidate ribbon development.

Policy GN3 – Infrastructure & New Development

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.

Policy GN26 – Residential Development

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

- 1. Open market housing or affordable housing to meet local needs, located within the Settlement Boundary of a Town, Service Centre, Service Village or Large Local Village as defined in the settlement hierarchy;
- 2. Affordable housing to meet local needs, located within the boundary of a Small Local Village

New homes will generally be permitted within Settlement Boundaries as these are locations with good access to services. New homes in Towns, Service Centres, Service Villages and Large Local Villages can be for sale on the open market or be affordable housing to meet local needs.

Policy GN27 – Residential Allocations

Minimum numbers of units identified for each site are indicative. Developers will be expected to demonstrate that they are providing a mix of housing types, to cater for changing patterns in household size, as it is estimated that 30% of all households will be one person households by 2021 (LHMA 2007). Further information relating to the delivery of allocated development sites, including information on phasing, is included in the Development Sites SPG.

The following sites are allocated for residential development.

Fig.5 LDP Extract – Housing Allocations

Housing Allocations	Site Reference	Minimum number of Units	(ha)	Indicative Affordable Housing Requirement	
Service Centres					
Lamphey - South of Cleggars Park	HSG/052/00011	55	2.42	10%	

Policy GN28 - Local Needs Affordable Housing

Local needs affordable housing will be sought on all housing developments. Indicative targets for provision on allocated sites are set out in Policy GN.27. In Towns, Service Centres and Service Villages a provision of affordable housing below the target figure may be appropriate where this is supported by economic viability evidence.

Lamphey - South of Cleggars Park Indicative Affordable Housing Requirement 10%.

Policy GN37 – Protection & Enhancement of Biodiversity

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, or the integrity of other habitats, sites or features of importance to wildlife and individual species, will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures.

Future Wales: The National Plan 2040 Future Wales: The National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It forms part of the development plan and provides a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

As described above, the Welsh development framework has been designed incorporating the principles of sustainable development at its core. This comes as a result of the Wellbeing of Future Generations (Wales) Act 2015 ('the Act') that gives a legally-binding common purpose – the seven well-being goals – to the public sector to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals.

In a more detailed level, the National Plan contains 18 strategic and spatial policies. In view of the nature of the development proposals, the policies below have been identified as relevant to the scheme:

Policy 1 - Where Wales will Grow

Policy 2 – Shaping Urban Growth and

Regeneration – Strategic Placemaking

Policy 7 – Delivering Affordable Homes

Policy 8 – Flooding

Policy 9 – Resilient Ecological Networks and Green Infrastructure

Policy 11 – National Connectivity

Policy 12 – Regional Connectivity

Planning Policy

Wales

Planning Policy Wales (11th Edition, February 2021) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions.

Paragraph 2.8 acknowledges that "planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales" and "the most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making planning policy and decision making" as per Paragraph 2.9.

PPW defines placemaking as a "holistic approach to the planning and design of development and spaces, focused on positive outcomes". This approach "considers the context, function and relationships between a development site and its wider surroundings" and "adds social, economic, environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary".

Fig.6 The Seven Goals of the Well-being of Future Generations (Wales) Act 2015



Fig. 7 PPW Themes Collectively Contribute to Placemaking (extract from PPW Edition 11) Strategic & Spatial Choices Good Design / Promoting Healthier Places / The Welsh Language / Sustainable Management of Natural Resources / Strategic Planning / Placemaking in Rural Areas / Managing Settlement Form Placemaking Social Places Enterprising Places Economic Development / Tourism Transport / Housing Retail & Commercial Centres The Rural Economy Community Facilities Transportation Infrastructure Recreational Spaces Telecommunications Distinctive & Natural Places Energy / Minerals / Waste Landscape / Coastal Areas / Historic Environment / Green

In light of the nature of the development proposals and their location, the following themes and policy topic areas are identified as relevant.

Infrastructure / Biodiversity / Water, Air, Soundscape & Light / Flooding / De-risking

1. STRATEGIC & SPATIAL CHOICES

Effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the development of specific proposals, or when formulating a development plan.

Good Design

Good design is one of these fundamental choices to creating sustainable places where people want to live, work and socialise. PPW 11 sets out five key aspects of good design which are essential to make placemaking happen:

1) Access and Inclusivity

This can be achieved "making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children" (Paragraph 3.6) and through measures and features that "enable easy access to services by walking, cycling and public transport" and "encourage people to meet and interact with each other".

2) Environmental Sustainability

Paragraph 3.7 states that "developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement (Paragraph 3.7)" and be resilient through "an integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, the adaptability of buildings and site treatment"

Paragraph 3.8 highlights that "landscape and green infrastructure considerations are an integral part of the design process" and, in a similar manner, addressing land contamination, instability and flood risk and providing for biodiversity benefits should be part of the design.

3) Character

Paragraph 3.9 highlights that "the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations". It goes on to say that "the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials" will be particularly important in areas recognised for their particular landscape, townscape, cultural or historic character and value.

4) Community Safety

Paragraph 3.11 establishes that "crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions"

5) Movement

Paragraph 3.12 states that good design in this matter means "minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys". It also remarks that "existing infrastructure must be utilised and maximised, wherever possible".

Previously Developed Land

Paragraph 3.55 emphasises the preference of previously developed land as opposed to greenfield sites. It advises that "previously developed (also referred to as brownfield) land [...] should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome".

The PPW definition of previously developed land is land "which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure".

2. ACTIVE & SOCIAL PLACES

Transport

Paragraph 4.1.11 sets out that "development proposals must seek to maximise accessibility by walking, cycling, and public transport, by prioritising the provision of appropriate on-site". In this respect, "the sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications" as per Paragraph 4.1.14. The Welsh Government policies set out the sustainable transport hierarchy which is, in this order, from walking and cycling, public transport, ultra-low emissions vehicles to other private motor vehicles.

Active travel is a cornerstone of the transport policies in Wales. Paragraph 4.1.31 confirms that "planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling".

With regards to vehicle parking, Paragraph 4.1.50 advises that a design-led approach should ensure that "appropriate level of car parking is integrated in a way which does not dominate the development". Paragraph 4.135 requires new development to "provide appropriate levels of secure, integrated, convenient and accessible cycle parking".

Housing

Paragraph 4.2.1 advises that "new housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities".

Paragraph 4.2.17 acknowledges the potential on brownfield sites to deliver further housing when saying that "maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites".

3. DISTINCTIVE & NATURAL PLACES

Green infrastructure

Paragraph 6.2 defines green infrastructure as "the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places" and "at smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks".

Paragraph 6.2.5 acknowledges the role of green infrastructure in enhancing the design quality of the built environment. It goes on to state that "with careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places". It is also advised that "there are multiple ways of incorporating green infrastructure, dependent on the needs and opportunities a site presents".

Paragraph 6.4.21 establishes that "planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible".

Technical Advice Notes

Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs:

TAN 2: Planning and Affordable Housing (June 2006)

TAN 5: Nature Conservation and Planning (September 2009)

TAN 12: Design (March 2016) TAN 18: Transport (2007)

Supplementary Planning Guidance

Supplementary Planning Guidance (SPG) are produced to provide further detail on certain policies and proposals contained within the Local Development Plan. They ensure that certain policies and proposals are better understood and applied effectively. SPG's do not however hold the same status or weight as adopted Local Development Plan policies. The following adopted Supplementary Planning Guidance is of relevance:

Affordable Housing (September 2015)

This Supplementary Planning Guidance (SPG) provides guidance on the way in which the affordable housing policies in the Council's adopted Local Development Plan (LDP) will be implemented.

Biodiversity (May 2014)

This Supplementary Planning Guidance provides further detail and guidance on the implementation of Local Development Plan policy to assist those involved in the development process in meeting statutory and policy requirements.

<u>Development Sites (December 2016)</u>

This Supplementary Planning Guidance (SPG) provides site specific information on all sites allocated for development in the Local Development Plan. The SPG has been prepared to provide prospective developers with an indication of the known constraints on individual sites. The information provided is a guide to the likely issues and considerations that will arise on each development site.

Parking Standards (June 2013)

This Supplementary Planning Guidance (SPG) document builds on specific Development Plan policies, providing advice on Parking Standards for new developments. It relates to the Council's area of planning responsibility, which is the whole County but excluding the Pembrokeshire Coast National Park.

Planning Obligations (September 2016)

The SPG provides guidance on Planning Obligations, including the on-site provision of Public Open Space.

Local Development Plan Review (LDP 2)

Following new evidence from the Joint Nature Conservation Committee about the damaging effects of phosphates to water ecosystems and species, in January 2021 Natural Resources Wales published new guidance on phosphates levels for Riverine Special Areas of Conservation (Riverine SACs) in Wales. The targets published are 50%-80% higher than previously.

A significant area of the rivers in Wales are currently failing to meet these targets, including sections of both the River Cleddau and the River Teifi. The new guidance has implications for the way in which any proposed development within a Riverine SAC is assessed under the Habitats Regulations. It therefore has implications on the location and sites which can be included as allocations in LDP 2.

The Authority will not be in a position to know which sites can be retained in the Plan until further information is received and additional research is undertaken. Further time is therefore required to allow essential evidence and data to be gathered and mitigation options on the phosphates issue to be devised. Therefore, proposals will be judged based upon the policies and guidance set out within the currently adopted Local Development Plan until such a time that matters with the RLDP progress.

Planning History

03/1543/PA

An Outline Application was previously submitted on the Site in 2003 (03/1543/PA). This application was refused on the 9th March 2005 on the basis that the proposals did not meet requirements of HSG03 of the then adopted Pembrokeshire Local Plan.

Engagement																
Pre- Application Enquiry PR/0334/22	A pre-application enquiry was submitted on 16 th December 2022 in respect of the proposed application. The pre-application response was received on 23 rd February 2023. The feedback from the pre-application process has been used to evolve the initial design of the scheme. The analysis section of this document details various iterations to the scheme, informed by advice received from the pre-application response.															
PAC Consultation	Section to be completed following completion of PAC Consultation.															
Analysis																
Principle of Development	55 dwell	lings (h ment d	nousing of the S	g alloca lite is c	ation re consequ	ferend uently	Site is allo ce (HSG/ (in full ac	052/0	0001).	The pi	rincipl	e of t	he res	sidentia	al	
Affordable Housing	of 10% a Group, v would si affordab housing	offorda with gr gnifica ble unit policy	able how ant-fur antly ov ts, which require	using f nding a verprov ch equ ement	or alloonssistant vide in ates to for the	cation ice We afford a 19%	ns) and G HSG/052 elsh Gove able hous provisio ation.	2/000 rnme sing c)1 . As a ent, ha deliver	a Regis ive bee y. Wit	stered en able h a mi	Socia e to d x of 5	l Land evelo 1 mai	dlord (f p a sch rket un	RSL) Ate neme wh nits and	eb hich 12
	Fig.8 Prop	osea H			chedule			1								
	Туре	HT Code			HT Area (M²)	Number of Units	Total Area of Each Unit (M²)									
	Affordable	1B-2P 2B-4P 3B-5P 4B-6P 721	1 Bed House 2 Bed House 3 Bed House 4 Bed House 2 Bed Bung	2 3	57 85 97 110	2 2 6 2	114 170 582 220 737									
	Open Market	925 969 1023 1282	3 Bed Bung 3 Bed House 3 Bed House 4 bed House	3 3	87 90 95 118	8 10 11 11	696 900 1045 1298									
		Total Number of Units and Coverage (M²) 63 5762 Total Number of Units and Coverage (ft²) 63 62022.168														
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Design and Character	develop	The Design and Access Statement that accompanies this planning application provides full details of the development in this regard following the PPW's key aspects of good design: Access and Inclusivity; Environmental Sustainability; Character; Community Safety; and Movement.														
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generous density of a variety of dwelling types. The layout of plots is depicted in the Site Layout Plan at Fig.11 below, which maximises residential accommodation whilst providing sufficient private amenity

space in accordance with Welsh Government Development Quality Requirements, by fully integrating the principles of these standards into the design solution.

The schedule of accommodation for the site comprises of a mix of 2 no. 1-bedroom affordable houses, 2 no. 2-bedroom affordable houses, 6 no. 3-bedroom affordable homes, 2 no. 4 bedroom affordable homes, 11 no. 2-bedroom open market bungalows, 8 no. 3-bedroom open market bungalows, 21 no. 3-bedroom open market houses and 11 no. 4-bedroom open market houses. These consist of a mix of detached and semi-detached dwellings and aim to provide a generous variety of homes for all types of future occupiers.

The design and layout of the site has been evolved in response to ground conditions and a risk of surface water flooding to the southeast. A POS area has been incorporated in this location inclusive of a drainage basin and accessible green space. A drainage strategy accompanies this submission which provides details on this drainage solution. An area of natural play space will also be provided just east of the basin, which would benefit from high levels of natural surveillance from adjacent properties and footpaths.

The design of the scheme has further evolved based on feedback received within the pre-application response. The response highlighted concerns around the regimented feel of the layout, including the highway arrangement. The housing pattern has been amended to appear less uniform and the materials palette has been diversified to create a less linear look to the dwellings. The roads to the west have been rounded off to soften the impact of the highway to the development.

Fig.9 Concept Stage Layout



Fig.10 Layout Proposed During Pre-Application Enquiry



Fig.11 Current Proposed Layout



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Geotechnical & Geo-Environmental Site Investigation Report and subsequent Supplementary Site Investigation Report have been produced for the site to assess a possible area of dissolution to the west.

At concept stage, this area was marked as a non-developable zone, however, following conclusions of the commissioned investigations, this area has been determined to be developable. The appropriate mitigation measures will be put in place which consist of "cruciform" spread foundations, and it is determined that dissolution no longer forms a constraint to the proposals.

The proposed dwellings will be served by two cul-de-sac estate roads which run parallel west to east across the site. Appropriate visibility splays and turning heads have been accounted for, notably around plots 35,38, 39 and 43. The two roads converge at the west of the site providing a link onto Freshwater Road, of which has good connections to the wider area and services.

A pattern of footways are proposed on Site in order to create ease of pedestrian circulation, these footpaths link with the wider safe routes through to Freshwater Road and Cleggars Park. Footways have also been incorporated for ease of movement from dwellings to the P.O.S area and play area in the east of the Site.

The dwellings have been carefully orientated, particularly at the boundaries of the site to ensure that there will be no overlooking impact and loss of privacy. The design of the scheme furthermore promotes natural surveillance and a sense of ownership to assist in crime prevention. Where possible buildings have been designed to face onto streets and spaces and terminate key views, maximise surveillance. All buildings are furthermore arranged in a manner to create a clear distinction between areas that are public and private. Adequate street lighting will also be provided in accordance with the Local Authority Highway standards, creating a more comfortable and attractive environment.

The scheme has been strategically designed to be attractive, safe and easily accessible. The proposed homes are designed to a high standard to complement the surrounding area and the scheme will seamlessly integrate with the existing residential area and supporting access to the community of Lamphey. The scheme furthermore provides significant open space provision, and includes many elements of sustainable design. It is concluded that the layout meets good design principles as set out in Planning Policy Wales and the Pembrokeshire County Council Local Development Plan.

Landscape Impact

The existing landscape has been a key consideration in the development of the design and a full landscape strategy has been developed for the site.

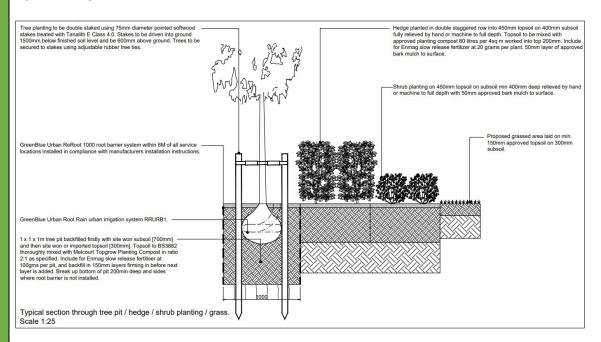
Whilst the Site lies on the boundary of the Pembrokeshire NPA authority area, it is reasonably flat, well enclosed by existing mature hedgerows, and seen in the context of the wider settlement of Lamphey in views from the park. The hedges and hedge banks around the perimeter of the site, particularly the ones adjoining the southern boundary adjoining the national park, will be retained.

The key features of the proposed landscaping of the scheme are as follows:

- Hedges and Boundary trees retained
- Tree planting
- Significant provision of public open space
- Provision of natural play
- Native Planting
- Landscape "green links" for wayfinding
- Green streets comprising of grass and shrub planting

Strategic planting to the frontages and the rear of properties will integrate the development into the surrounding landscape. The current design layout has furthermore been configured around existing trees where possible, and existing level restrictions. Additionally, the site plan includes a sizable amount of secure shared amenity greenspace surrounding the proposed apartments.

Fig.12: Planting Plan



The scheme's drainage strategy includes a POS area and drainage basin designed for dual purposes. Although the basin will serve as green space for most of the year, it will be designed to hold excess water during heavy rainfall. The basin will not contribute towards the formal provision of open space calculated for the site.

Just east of the basin, the scheme incorporates a "natural play space" feature that blends seamlessly into the surrounding landscape. This design was developed based on direct recommendations from officers during the pre-application process. The play area will consist of smooth boulders, timber balance logs, and grassy mounds for children to play on.

17 No. Rose carries 10%
9 No. Semburous reging 1%
2 No. Behala pubescene

2 No. Behala pubescene

2 No. Behala pubescene

Progosed natural play area comprising smooth boulders, timber balance logs and grass play mounts

1 No. Quercus robur

1 No. Quercus robur

Fig.13: Extract of Soft Landscaping Strategy - Area of Natural Play

The sensitive landscape character of the adjacent national park has been a key driver of the design evolution of the scheme. The scheme incorporates strategic design and landscaping to integrate into the Site's character and landscape context. Therefore, it is deemed that there is no policy conflict in developing the site on the basis of landscape impact.

Movement and Highway Impact

The Site itself is considered a sustainable location under Policies SP1, SP12 & SP14 identified as a "Service Village". A variety of services can be accessed easily by all modes of transport within and around the wider area. The site location is demonstrated to be consistent with the aims of TAN18 and in accordance with sustainable transport policies in Future Wales & PPW11. The delivery of this scheme will allow residents to move freely across the site and into the adjacent Cleggar's Park.

Access to the site will be via the existing access that is already formed. This is to an adoptable standard, providing a 5.5m wide carriageway with 1.8m wide footways. The adoptable highway will be extended into the site with turning heads provided at the ends of the development's street to allow for refuse vehicles to manoeuvre through the site. Shared private driveways will serve groups of no more than 5 dwellings at the site's south -western, north western and north eastern corners.

On the Site a variety of footways are envisaged to facilitate easy pedestrian circulation. The Site is accessible to pedestrians from Cleggar's Park via a new dedicated pedestrian link to the north-west and via footways along the main Site entrance to the west. Dedicated footpaths have been included within the Site to provide safe pedestrian access to the P.O.S. area & play area to the east.

The parking standards for the development are informed by sustainability credentials of a given Site as outlined within the Parking Standards SPG. The Site is within the settlement of Lamphey, which is designated as a "Service Village" as a result of its good access to services and sustainable travel options, however the Site is relatively peripheral to the location of these services within the settlement. As a result it is concluded that the Site lies in Zone 4 for the purposes of the SPG. This has been confirmed by the Local Authority through engagement at the pre-application stage of the proposals. Parking for the scheme is typically on plot and provided in accordance with this guidance.

A Transport Statement has been prepared for the Site in order to fully understand the potential impacts of this development. The report conclude that the proposed development is in an appropriate location, with a number of amenities available in Lamphey that will provide residents with day-to-day needs. The site is deemed accessible to pedestrians, cyclists, and public transport users alike and a and it has been concluded within the report that the appropriate access that meets current design standards that can be provided to the site from the adjacent highway.

The report also confirms that the estimated traffic generation of the proposed development will be insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network. The scheme therefore would not have an adverse impact on either highways capacity or highway safety and would comply with LDP Policies SP10 (Transport Infrastructure and Accessibility) and Policy GN1 (General Development Policy).

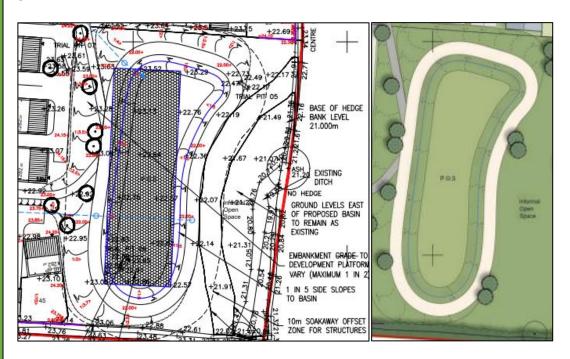
Flood Risk and Drainage

Surface water flooding has been identified as a risk at the south-east extremity of the Site and consequently appropriate mitigation measures have been incorporated into a suitable drainage strategy which accompanies this submission designed in compliance with the relevant SABs legislation.

Policy GN1 advises where allocations are at risk of fluvial or surface water flooding, the development should follow guidance outlined within "Development Sites Supplementary Planning Guidance 2016" In line with this guidance for allocation HSG/052/00011, whereby 10% or more of the site is susceptible to surface water flooding, the scheme must incorporate a design sensitive to these affected areas and ensure appropriate mitigation.

The drainage solution for the southeast of the site consists of an infiltration basin and cellular storage sited outside of the flood zone area, with a 10m offset zone for structures and cellular storage soakaways.

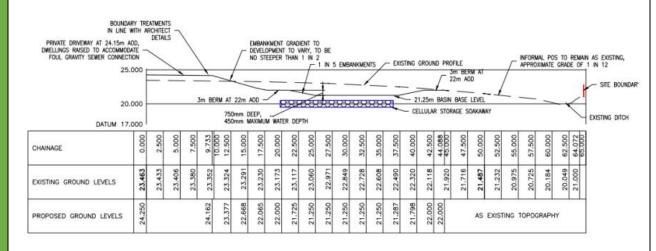
Fig.13: Attenuation Basin



The multi-function green space area will be provided in the south-east corner of the site. This space has been carefully designed to integrate surface water attenuation, ecological mitigation, and accessible informal open space. A central, shallow basin represents the focal point of this space.

For much of the time this basin will be dry and open to be used as an extension of the accessible open space, with an underground tank below the basin serving the surface-water attenuation requirements of the development. In extreme rain-fall events however the basin will provide additional storage to a minimal depth (circa 45mm). The area around the basin will also provide informal green space and a footpath around the basin will provide easy public access. The scheme will however provide a surplus of open space provision to the requirements set out within the Planning Obligations SPG, excluding the basin.

Fig.14 Indicative Section Through Basin



It has been demonstrated that the scheme can effectively mitigate against the risk of surface water flooding and the acceptability criteria set out within TAN15 have been satisfied. The development furthermore satisfies the guidance set out within the Pembrokeshire County Council Local Development Plan and associated SPG.

Ecology

All development is now expected by Welsh Government to improve biodiversity and Policy 'GN.37 – Protection and Enhancement of Biodiversity' requires proposals to demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity.

An extended Phase 1 and Protected Species Survey has been produced by Kite Ecology detailing areas/habitats of significant ecological value. The survey concluded that it was likely that the Site was under use by foraging and commuting bats, as well as several bird species. No other reptiles or species were recorded on site. Due to the presence of bats, external lighting will be kept low level, hooded and downward facing to avoid light spill and will be operated on a PIR activated timer.

Recommendations were made within the Ecology Survey on the incorporation of bird/bat boxes and bee bricks in order to enhance insect activity. Additionally, due to the rapid decline of hedgehogs and hedgehog activity being recorded within the wider area, hedgehog highways are recommended to be incorporated into fencing proposed within the scheme.

Ecological mitigation is intended to be incorporated into the green space in the south-eastern corner of the Site. Feedback received as part of the pre application process confirms the suitability of the proposed enhancement and mitigation measures to comply with relevant policy. The report furthermore concludes that it is unlikely that the development would negatively impact on the biodiversity of the area.

Open Space

The Council's Open Space Assessment (2019) indicates that there is an existing shortfall in informal outdoor open space provision in Lamphey. Utilising the guidance contained in the Planning Obligations SPG (2016) the proposed development should provide for a minimum of 715 sq.m. of informal open space provision. The proposed development includes a significant amount of public open space, exceeding the minimum density requirement for the site by 3000sqm+. This includes areas of public amenity space and play space. The dual-purpose drainage attenuation basin to the east will furthermore form an extension to the open space area when dry, but does not contribute towards the formal provision of open space calculated for the site.

The area around the POS will be protected from the east and south by retained hedgerows and trees. Additionally, the space will open up to the west towards the proposed dwellings, providing a safe community space designed for natural surveillance and ease of use. A public footpath will pass through the POS, to connect the two streets and support active travel throughout the site.

Initially, the scheme featured a Local Area of Play (LAP) in the northeast, complete with necessary buffer zones. However, through discussions with the Planning Officer during the pre-application process, the design has been modified to replace the LAP with a "Natural Play Space." This feature will include smooth boulders, timber balance logs and grass play mounds, and will be situated further southeast within the designated large public open space area, as recommended by the officer, at a more suitable location.

A range of footways have been designed to link the various areas of open space across the site for ease of pedestrian movement. These footways are well overlooked by adjacent plots. The soft landscape setting of the site will furthermore be reinforced by native structural planting and attractively landscaped front gardens.

It is concluded that the site offers a substantial provision and variety of strategic open space, exceeding what is required within the Planning Obligations SPG.

Conclusion

The principle of developing the site as proposed is in full accordance with the LDP. The site benefits from a housing allocation within the Pembrokeshire County Council LDP and is regarded as a highly sustainable location. Active travel at expense of private car usage is highly likely for the users of the scheme. The scheme has furthermore evolved through the pre-application process and responds to concerns raised by the planning officer and various internal consultees in an appropriate manner.

It has been demonstrated that place-making principles have been fully integrated into the design of the scheme, in adherence with the provisions of both PPW and the LDP. The scheme will provide a range of high-quality housing units to meet the demand for market and affordable housing within the local area, Including an significant overprovision of affordable housing against the policy requirement.

All technical matters have been addressed within the proposals and so the scheme fully accords with the key policies of the Pembrokeshire County Borough Council Local Development Plan and the various guidance contained within the adopted SPGs, and should be supported.