Pembrokeshire Local Development Plan 2
Representations to the Inspector at Examination Stage

Representor 2233 – S & F Walder and neighbours

Examination Session 7

In our representations for Examination Session 2 we outlined our high level objections to the inclusions of Sites 2/2 and 2/5 on the grounds of general oversupply allocated for housing and the specific allocations in Pembroke and Pembroke Dock. At this session we wish to highlight that the development of these two sites is also unsound in that it is contrary to several planning policies.

Site 2/5 was a candidate site for the first Local Development Plan (LDP1) but was rejected as being outwith the settlement boundary.

Planning Policy Issues
Both SP 2, Housing Requirement and SP 6, Settlement Boundaries policies guard against unnecessary development outside existing settlement boundaries.

GN 1,General Development Policy states that development will only be permitted where it is compatible with the character of the site and will not be detrimental to local amenity. Both sites would:

- Impact the landscape to the south of Pembroke when viewed from the town centre and the castle.
- Be on land up to 40m above OD and overpower the adjacent existing housing at 25-30m above OD.
- At an density of 30 units per hectare be more than four times the site density of the Southlands development (6.9/ha)
- Cause significant detriment to the residents of Southlands in that a twin cu-de-sac of 13 houses becomes the thoroughfare to a further 45 properties.

Policy GN 38, Landscape, specifically requires development not to have an adverse effect on the landscape. Because of the height of the ground and probable development type there would be a major breach of the ridgeline view from Pembroke town.
When the Southlands development was approved 30+ years ago there was a prohibition on two storey development for the most southerly properties (No's 6 and 21) in order to avoid breaching the ridgeline view from Pembroke town.

Site 2/2 is in the ownership of the LPA; constraints on additional access to the B4319 St Daniels Hill highway mean that it could only be used for housing development if access was provided through both Southlands and Site 2/5. It would seem therefore that it is in the LPA's interest to include the allocation of both sites in LDP2 despite being contrary to planning policies.

To illustrate the issues of density and type of development please see the aerial photograph attached as Appendix A. This clearly illustrates the contrasting development densities and the unsuitability of Southlands as the route into Sites 2/2 and 2/5.

On all the above grounds we believe LDP2 fails Test 2 - Appropriateness

Since we made our response objecting to the LDP proposals we have become aware that Persimmon Homes West Wales have indicated that they will seek to obtain planning permission for Site HSG/095/LDP/1 between St Daniels Hill and Norgans Hill following the adoption of the proposed LDP. This site is on slightly lower ground immediately to the west of Southlands on the other side of the B4319 road.
The proposed development is for 147 properties and in the words of the LPA's own assessment "…is likely to dominate the market" … "so there is unlikely to be any developer interest in (Sites 2/2 and 2/5) until late in the plan period…"

Given our earlier evidence about the totality of housing requirement the likelihood of any need for allocation of Sites 2/2 and 2/5 in LDP 2 is highly questionable. We therefore believe their inclusion fails Test 3 - Deliverability.

The allocation of these two sites in the Deposit Plan has already incurred concern and diminution in potential property values to the residents of Southlands for developments that are neither necessary nor deliverable. The Deposit Plan as submitted by the LPA is therefore not sound and we request the Inspector deletes them from the Plan.

Appendix A

This is a view of the south part of the Southlands estate together with the two fields that are HSG/095/LDP2/5 (top centre) and HSG/095/LDP2/2 (top right)



The lower half of the picture shows 7 houses on one leg of the twin cul-de-sacs occupying approximately 1 hectare.

It is proposed to build 26 houses within the top centre field on 0.88 hectares

On the top right field 19 houses within 0.64hectares.

All 45 additional properties would have to be serviced via the existing estate road through the middle of the picture.