Representor No: 4188/4389
Representor: Asbri Planning on behalf of Wales & West Housing Association
Matter 8: Site allocations: Cawdor Barracks and urban centres
HSG/088/LDP2/1 (West of Bloomfield Gardens and North of Adams Drive & Highfield Park, Narberth)

Matter 8: Site Allocations
Issue: Are the allocated sites soundly based and capable of delivering new residential development over the Plan period?

The following Statement has been prepared for Hearing Session 8 with regards to *'HSG/088/LDP2/1 (West of Bloomfield Gardens and North of Adams Drive & Highfield Park, Narberth)'* on behalf of the Site Promoter (Wales & West Housing Association). A response to each of the Inspector's questions (in relation to HSG/088/LDP2/1) is set out below.

1. What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

The constraints affecting the site have been partially identified during the technical work undertaken as part of the full planning application for residential development in the eastern parcels of the allocation site (over half of the total site), granted in March 2025 (23/0654/PA). The granting of planning permission illustrates how a scheme for residential development can be successfully achieved within the allocation site.

Initial site survey and assessment work has been undertaken to date which demonstrates that the inclusion of site HSG/088/LDP2/1 as a housing allocation fully accords with the RLDP strategy. As part of the candidate site assessment a high level investigation of site constraints has been undertaken and this has informed the proposed residential allocation within the RLDP.

An overview of the site constraints is captured within examination document ED12g *'Housing/Residential Allocation GN16 Settlements N-W'*, which provides a snapshot of the site characteristics. The key site constraints as they relate to the development of the site are identified as:

Phosphorous & Nitrogen

- *"Nutrient neutrality for nitrogen required for this site."*

Water & Drainage:

- *"A water supply can be provided for the site. The public sewerage network and Narberth WwTW can accommodate foul slows from the site. The site is crossed by an abandoned water main and a 6" diameter watermain."*

Highways:

- *"Split access to Bloomfield Gardens and Adams Drive. No highway improvements are required as the site will use the existing access roads leading to the B4314 and Redstone Road. The internal layout must not connect Adams Drive to Bloomfield Gardens to prevent through-traffic."*
- *"Access into the western most field of this site will require a full transport assessment with likelihood of a further access point required onto Cox Hill."*
- *"Traffic may impact on the Trunk Road and consultation with SWTRA is required. A Transport Statement is required."*

Flood Risk:

- *"This site is not within a flood zone, however disposal of surface water as part of a SuDS approach is required."*

Heritage & Conservation:

- *"A geophysics survey of the site has been undertaken and no clear features of potential archaeological interest or significance were found."*

Ecology & Green Infrastructure:

- *"Potential impact on a Natura 2000 site. Screening for a project level HRA may be required at application stage."*
- *"There should careful consideration of the design to ensure any trees and mature hedgerows within and surrounding the site be retained and protected in addition to those protected by tree preservation orders (TPOs)."*
- *"Dormice are likely to be present in the area, a habitat area should be created and managed for dormice to mitigate for disturbance and provide biodiversity enhancements."*

Landscape:

- *"Trees and mature hedgerows within the site to be retained and protected in addition to those protected by Tree Preservation Orders."*

Electricity Supply:

- *"An 11kv overhead cable and three poles run north to South adjacent to one of the hedgerows. This may need to be diverted."*

The supporting information prepared in relation to site HSG/088/LDP2/1 to date has demonstrated that a sustainable, high-quality residential-led mixed use scheme which responds sensitively to both local character and landscape setting can be delivered on the site.

Furthermore, it is envisaged that a package of contemporary technical reports and surveys would be prepared in support of any future planning application for the remainder of the allocation site, aiming to address on-site constraints. It is anticipated this package will likely include a detailed masterplan, Green Infrastructure Statement, Transport Assessment, Active Travel Plan, Ecological Surveys & Report & Arboricultural Report.

In summary, it is considered the site constraints identified above are manageable in nature and where suitable, appropriate mitigation can be utilised. On this basis, it is considered the identified site constraints will not constitute significant obstacles to the development of the site within the Plan period.

2. In light of the constraints, and having regard to policy provisions for infrastructure including affordable housing and planning obligations, is the allocation economically viable?

Yes. It is envisaged the identified site constraints will not prejudice the economic viability of the development scheme. The anticipated affordable housing provision and potential planning obligations will not form a barrier to the successful development of the site. Contributions and obligations are likely to comprise:

- Active Travel: an active travel route to promote cycling and walking,
- Education: A financial contribution to fund a shortfall in capacity at the local primary school,
- Affordable Housing: contribution/provision of 40%
- Recreational Open Space: On site provision of 2 Local Areas of Play (LAPs) and one Local Equipped Area of Play (LEAP) required. Offsite financial contribution to playground at Town Moor and outdoor sports provision at Town Moor.

As referenced above the site promoter, Wales & West Housing Association, is seeking to commence preparation of a Planning Application to bring the remaining unconsented parts of the proposed allocation forward for development promptly. A formal planning application will be submitted to Pembrokeshire County Council to secure permission for the site and enable its development at the earliest opportunity.

3. Having regard to site-specific evidence and relevant policies for on-site infrastructure and design-related matters, are the number of dwellings proposed realistic and deliverable over the Plan period?

Yes. The initial site assessment and survey work prepared to date in relation to site HSG/088/LDP2/1, has indicated that a sustainable, high-quality residential scheme can be delivered on the site. Given that planning permission was granted in March 2025 for the residential development of 91 units within the eastern parcels of the allocation, the site promoter is confident that the total number of dwellings proposed within the allocation is realistic and deliverable over the Plan period.

4. What are the mechanisms and timescales for delivering the site?

As referenced above, our Client is looking to commence preparation of a Planning Application for the remaining unconsented parcels of the site, so as to ensure that site can be brought forward for development promptly. A formal planning application will be submitted to Pembrokeshire County Council to secure permission for the site and enable its development at the earliest opportunity. Further discussions will be held with the Local Authority in this regard.

As the Authority are aware, a significant amount of supporting information has been prepared in relation to the majority of the proposed allocation over the course of the preparation and submission of the planning application for the site currently allocated within the LDP (23/0654/PA and HSG/008/00078 respectively), which proposed *'Residential development, engineering, landscaping, drainage, highways*

and other associated works - Land to the north of Adams Drive and to the west of Bloomfield Gardens, Narberth'; approved in March 2025.

It is reiterated that our Client (Wales & West Housing Association) is fully committed to the delivery of the allocation, in accordance with the policies of the Replacement Plan (both site-specific and plan-wide policies inclusive) and this is evidenced by the securing of planning permission for residential development in the eastern parcels of the site.

5. Is the site allocation essential to ensure the soundness of the Plan?

The site, which is supported by initial site assessment and survey work that has been undertaken, will make a valuable contribution towards the Plan's housing provision. The proposed allocation is therefore essential to the soundness of the Plan, in ensuring that the Plan will deliver (Test of Soundness 3) i.e. the allocation is essential to the delivery of the Plan's Growth Strategy.