Representor No: 4188/4389
Representor: Asbri Planning on behalf of Wales & West Housing Association
Matter 8: Site allocations: Cawdor Barracks and urban centres
GN 19A Maesgwynne, Fishguard (S/HSG/034F/LDP2/1)

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 'GN 19A Maesgwynne, Fishguard (S/HSG/034F/LDP2/1)' on behalf of the Site Promoter (Wales & West Housing Association). A response to each of the Inspector's questions (in relation to S/HSG/034F/LDP2/1) is set out below.

1. ***Is the site policy supported by detailed evidence to support its delivery, including Statement(s) of Common Ground? (DPM Table 18)***

The proposed allocation of 'GN 19A Maesgwynne, Fishguard (S/HSG/034F/LDP2/1)' is informed by initial supporting survey and assessment work, which has shaped the materplanning efforts to demonstrate that there are no constraints/obstacles to the development of the site coming forward within the Plan period.

As the Authority are aware, initial site assessment and survey work has been undertaken in relation to the above site over the course of the preparation of the Replacement LDP to date. These efforts have sought to support the inclusion of Maesgwynne as a strategic housing allocation which accords with the RLDP strategy. This is recognised through the site successfully passing through all phases of the candidate site assessment (candidate site reference 335). Furthermore, through the work that they have done to date, it is considered by Wales & West Housing Association that the site is entirely deliverable.

In regards to site deliverability, it is the case that our Client is looking to commence preparation of a Planning Application for the scheme accordingly, so at to ensure the 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.

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

As noted above, initial assessment work has been undertaken to date which demonstrates that the inclusion of Maesgwynne as a strategic housing allocation fully accords with the RLDP strategy. As part of the candidate site assessment an initial 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 ED12e *'Housing/Residential Allocation GN16 Settlements B-K'*, which provides a snapshot of the site characteristics. The key site constraints as they relate to the development of the site are identified as:

Water & Drainage:

- *"A hydraulic modelling assessment (HMA) will be required to determine the point of connection to the water supply network and to the public sewerage system"*
- *"The public sewerage network and Fishguard WwTW can accommodate the foul flows from this site."*

Highways:

- *"The planning permission for an earlier phase of development, now completed and known as Parc Loktudi, included a condition that its existing access onto the A40 must be stopped up once a new roundabout and access through this allocated site is completed. This will require re-assessment as part of an updated Transport Assessment (TA) for the whole site. That TA will include an assessment of whether a roundabout is now considered to be needed at the site entrance – and if not, what alternative highway access arrangement will be required. Active travel links should also be fully investigated in the updated TA."*

Flood Risk:

- *"The site is not within a flood risk zone. There is a small risk of surface water flooding along the south-western boundary of the site and along the lane running east to west through the site (Maesgwynne Road). The sustainable disposal of surface water as part of a SuDS approach is required."*

Heritage & Conservation:

- *"The farm complex at Maesgwynne lies adjacent to this site. This group of buildings is Grade II listed. Mitigation is required to minimise the impact of site development on this group of buildings."*

Site Contamination:

- *"There may be contamination issues at this site, and a risk assessment will therefore be required."*

Ecology & Green Infrastructure:

- *"A tree preservation order (TPO) protects the trees within the hedgerow that divides the two northern fields, and these must be preserved."*
- *"Hedgerows surrounding the site must be retained."*
- *"The site lies within a B-Line."*
- *"Badgers may be present within the site."*
- *"NRW advises that Pembrokeshire bat sites SAC surveys will be required."*

- *"There will possibly need to be a need for a Test for Likely Significant Effects and potentially therefore also an Appropriate Assessment to meet Habitats Regulations Assessment requirements."*

Landscape:

- *"This proposal would result in a major extension of the built area in this part of Fishguard and as such would benefit from a Landscape Study with recommendations for landscape impact mitigation measures."*

The supporting information prepared in relation to the Land at Maesgwynne allocation site to date, including the initial masterplanning work which has been undertaken, 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, aiming to address on-site constraints. It is anticipated this package will likely comprise a detailed masterplan, Green Infrastructure Statement, Heritage Impact Assessment, Agricultural Land Classification Report, Landscape and Visual Impact Assessment, Community Linguistic Assessment, Transport Assessment, Ecological Surveys & Report, Arboricultural Report & Contaminated Land Risk Assessment.

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.

3. 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 site promoter is content with the requirements of the proposed Policy as it relates to the development of allocation S/HSG/034F/LDP2/1. The anticipated affordable housing provision and potential planning obligations will not form a barrier to the successful development of the site. As referenced above the site promoter, Wales & West Housing Association, is seeking to commence preparation of a Planning Application to bring 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.

4. 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 in relation to the Land at Maesgwynne allocation site to date, including the initial masterplanning work which has been undertaken, has demonstrated that a sustainable, high-quality residential scheme can be delivered on the site. The opportunity to masterplan the remaining parts of the site to be developed will allow for key features to integrated, including public and amenity open space, sustainable drainage systems (SuDS), a buffer zone adjacent to Maesgwynne Farm, areas for nature conservation value and sustainable, as advocated for within the proposed Policy text GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1.

5. 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 scheme, 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. We therefore wish to reiterate 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).

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

The site, which is supported by a significant extent of site assessment and masterplanning exercises which 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.

7. Does the policy include all essential requirements to deliver the site?

Yes. The proposed policy text of GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1 sets out details relating to the key masterplanning features, to include *"public and amenity open space, sustainable drainage systems (SuDS), a buffer zone adjacent to the Maesgwynne Farm complex, areas protected for their nature conservation value and all matters relating to sustainable access."* Additionally, the proposed policy text identifies the vehicular access considerations in respect of the A40 Trunk Road and the requirements of the Trunk Road Authority. In summary, it is believed the Policy captures the essential requirements to deliver the site.

8. Does the policy contain sufficient placemaking and master planning detail?

In respect of placemaking and master planning, the proposed policy text of GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1 states *"Wales and West Housing Association has commissioned Asbri Planning Ltd to prepare a masterplan for the undeveloped parts of the site, which could form a basis for future planning applications and for LDP 2 Supplementary Planning Guidance following plan adoption."* On this basis, it is considered the proposed policy contains sufficient scope to prepare a dedicated masterplanning strategy, alongside the potential for a site specific Supplementary Planning Guidance document, post Plan adoption.

In addition to the above, the Policy text sets out the identified key features of a future development scheme, stating: *"A masterplan will be prepared for the remainder of the site, based on further residential development, together with public and amenity open space, sustainable drainage systems (SuDS), a buffer zone adjacent to the Maesgwynne Farm complex, areas protected for their nature conservation value and all matters relating to sustainable access."* In summary, we believe the Policy contains sufficient placemaking and master planning detail.