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PEMBROKSHIRE COUNTY COUNCIL LOCAL DEVELOPMENT PLAN 2 EXAMINATION

RESPONSE TO MATTERS AND ISSUES – MATTER 8 (HEARING SESSION 7):
CAWDOR BARRACKS AND URBAN CENTRES

Please find enclosed, on behalf of, and under instruction from the landowner and promoting party, L. Greggain and Co Ltd, a submission to the Examination of the Pembrokeshire County Council Local Development Plan 2 (LDP2) in relation to sites at :

- Land at Myrtle Meadows, Steynton (ref. HSG/086/LDP2/1) – which is allocated as a residential site within LDP2 policy GN 16 (Residential Allocations); and
- Site South of Conway Drive, Steynton (ref. S/HSG/086/LDP2/3) – which L. Greggain and Co Ltd have made representations on / to previously, and raise objection.

This submission comments on matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Matter 8: Site Allocations: Cawdor Barracks and Urban Centres: *"Issue – Are the allocated sites soundly based and capable of delivering new residential development over the Plan period?*

We look forward to attending the Hearing Session in respect of the matter above in due course. In the meantime, we hope and trust that all is in order with the submission. Please do not hesitate to contact us in the event that further information is considered beneficial.

Yours sincerely,



Geraint John
Director
Geraint John Planning Ltd.

PREFACE

This submission relates to the matters and issues raised by, and set out in, the Inspectors' Schedule of Matters, Issues and Questions to cover Matter 8: Site Allocations: Cawdor Barracks and Urban Centres: *"Issue – Are the allocated sites soundly based and capable of delivering new residential development over the Plan period?"*

Each of the relevant issues raised in relation to the above matters are considered in detail below.

This Submission

It should be noted that these submissions do not necessarily respond to every question raised within the Inspector's Schedule of Matters, Issues and Questions, as not all of these questions necessitate a response by us, and/or earlier submissions made on behalf of the promoting party (Representor ID. 4475). It is considered in particular that the submissions made at the Deposit Plan stage – December 2024 are considered sufficient to address the majority of the matters raised, and moreover provides considerable plan based evidence of the points made herein. Accordingly, these representations only provide responses to questions where it is considered necessary and relevant to do so, and do not repeat the content of the Deposit Plan representations.

QUESTIONS

Issue – *"Are the allocated sites soundly based and capable of delivering new residential development over the Plan period?"*

GN 19B South of Conway Drive, Steynton (S/HSG/086/LDP2/3)

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

   In summary – it is respectfully considered that it is not. Whilst we are aware that Statement(s) of Common Ground (SoCG) have been prepared in respect to policy related matters – Minerals, and with the Pembrokeshire Coast National Park Authority (PCNPA), we are not aware that SoCG's have been prepared for individual (key) sites. This is the case in respect to GN 19B South of Conway Drive, Steynton, or at the very least has not involved the adjoining landowner (our client) – whose land and site the proposed allocation is reliant and dependent on (and who objects to the allocation). Our client's participation, and signature, to any SoCG would be essential.

   We are aware that the Development Plans Manual requires Key Sites (sites which are key to the delivery of the Plan overall) require greater evidence to support their delivery. This includes schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters etc (all in order to support SPG/Development Briefs/Master plans), s106 requirements, infrastructure and costs. Requirements essential to deliver these key sites should be elevated into the policy, supported by a schematic framework. These principles should be set out in Statements of Common Ground (SoCG).

   Whilst the Plan contains a somewhat detailed policy on the site / allocation (pages 140-141 of the Deposit Plan), it contains no schematic framework plan / illustrative concept plan or masterplan etc – simply the requirement for such detail to be prepared. The text of the policy goes on to record that the site will be the largest of its type to date in the area – making the requirement for such detail to be even greater. Despite this, no such detail is provided. This approach does not follow other LDP's in Wales that have progressed to Examination and Adaptation.

   Indeed, what detail that is set out in the policy text serves to evidence and confirm our client's / the objectors position – that given the access and other requirements, the site / allocation cannot be delivered – not least as it is reliant on our client's site. This is the case to such an extent that it would require a re-plan of our client's approved scheme, and the omission (loss) of units to accommodate the allocated site.

As set out in the detailed (and evidenced) representations (objection) to the Deposit Plan, the allocation is impeded by, and rendered undeliverable by, our client's land and scheme (in particular the access requirements through their site – via Beaconing Drive, St Peter's Way and Hilton View).

As confirmed by the detail to the Policy / allocation, and the more detailed Housing Residential Allocation site assessment work, the following is confirmed :

"There will need to be at least two vehicular access points to the site to ensure emergency vehicles can access the site at all times, namely from Castle Pill Road and Neyland Road via Beaconing Drive, St Peter's Way and Hilton View."

(GJP underline emphasis)
Our client's scheme is now at such an advanced stage that the final phase (Phase 5) of the scheme (that which relates to the southernmost part of their site, and that bordering the allocation boundary) is now well underway. The entire development is nearing completion. The access carriageways to the approved cul-de-sac's have been laid out and installed (to an insufficient specification to accommodate further development and traffic to the south through to the allocated site), whilst the development of the allocation would necessitate the removal of a number of approved units from the client's site in order to accommodate linkages etc. A number of units within this final phase are practically complete (roof structures being added), whilst a number of plots have been reserved 'off plan' – the entire phase being marketed for sale.

Given the above, the requirements of the allocation are incompatible with, and are prejudiced by, the 'build out' of our client's approved scheme to its north – such that the basis for allocation is fundamentally undermined. This, combined with the limited and constrained access to/from Castle Pill Road – which is considerably constrained in specification and / or will require significant landscape impact and GI / biodiversity loss accommodate any access will render the development undeliverable.

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

Without repeating the above, it is clear that the site has a number of substantial infrastructure and services constraints. The relationship with our client's approved scheme is the most fundamental.

Over and above this, the sub-station capacity installed on our client's site at the south western corner, and alongside the boundary with the proposed allocation, is of insufficient capacity to accommodate the allocation (with no flexibility or ability to be expanded). The water supply to the approved development (at 90mm) is of a specification that will not accommodate further capacity and connnections whilst the foul flow pumping station in the vicinity of the site is committed to other planned development (and allocated sites), and is of limited capacity accordingly.

Given the above it is clear that the site, and its immediate surrounds, are heavily constrained and limited, and that accommodating the proposed development is neither possible or feasible.

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?*

As set out above, the site is not considered to be viable in outright terms, let alone as and when planning obligations and other provisions are factored in and accounted for.

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?*

In summary – it is respectfully considered that it is not. The site is not deliverable outright, let alone some / all units within the Plan period.

5. *What are the mechanisms and timescales for delivering the site?*

   None. It is respectfully considered that the site allocation should be deleted. The above evidences the position.

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

   As a Key Site, it is considered that the delivery of it, or otherwise, will have a bearing on the soundness of the Plan.

   Given this, it is considered that other allocated sites should be prioritised and facilitated to come forward, whilst other land identified and allocated to off set the loss of capacity that the intended allocation is scheduled to provide.

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

   No. There is no agreement or arrangement in place with the developer / landowner of the approved development site to the immediate north, and through which access(es) are required to be provided, and on which infrastructure and service provision will be reliant.

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

   No. As set out and evidenced in response to Q1 above, whilst the Plan contains a relatively detailed policy on the site / allocation (pages 140-141 of the Deposit Plan), it contains no schematic framework plan / illustrative concept plan or masterplan etc – simply the requirement for such detail to be prepared. The text of the policy goes on to record that the site will be the largest of its type to date in the area – making the requirement for such detail to be even greater. Despite this, no such detail is provided.

HSG/086/LDP2/1 (Land at Myrtle Meadows, Steynton)

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

   As confirmed by the detailed Housing Residential Allocation site assessment work produced for the site, and published as part of the process, the site is recorded as having no constraints.

   As recorded in the detailed assessment, and in summary, the allocation is a greenfield extension to an existing, recently developed, residential estate. Indeed the site is owned and promoted by the developer of that adjoining site to the west – who has, accordingly, detailed and unparalleled knowledge of, and experience in, delivering a site immediately adjacent. That same developer is currently developing out a site to the east which is nearing completion.

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?*

   The site has, as set out above, no constraints, and as such is deliverable.

   It has also been confirmed through a Development Viability Assessment (prepared jointly with the Council's appointed advisers – BHL) that the allocation is economically viable. The findings of the Update / Addendum in respect to Financial Viability (Feb 26), which recognises and records changes in values and costs, will influence final levels of provisions. Notwithstanding this, the site is considered to be economically viable.

   Afterall, the site and allocation is owned by, and promoted by, a housing developer who has a significant track record in delivering housing in the immediate vicinity (indeed immediately alongside the site).

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 – indeed the client is of the view and opinion that the site can, and will, yield earlier and quicker than currently provided for in the Housing Trajectory (or at least consistent with it). This is a product and consequence of the site currently under development in the vicinity nearing completion, and the desire to advance other sites as quickly as possible for continuity reasons.

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

   A planning application can and will be prepared swiftly and in the short term. This will be informed by, and enabled by, the considerable work and evidence on nearby sites, and the considerable supporting and assessment detail formulated for the promotion of the allocation of the site.

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

   It is considered that the allocation is key to the ensuring the soundness of the Plan – not least by virtue of the contribution that the site will make to early delivery of units in this part of the Plan area, and the continuity of build for an active housebuilder with a track record in delivering units in the area (and making a valuable contribution to housing land supply in the process).

Conclusion

In summary, the following is the representors response to the Schedule of Matters, Issues and Questions set out. This is expressed relative to each site and matter responded to:

GN 19B South of Conway Drive, Steynton (S/HSG/086/LDP2/3)

The allocation is fundamentally constrained, undeliverable, and ought to be deleted accordingly.

Considerable detail has been set out in this and earlier representations to the Plan - to evidence this position. Not only is there a lack of detail in respect to the site, but assumptions and policy requirements in respect to infrastructure and other elements are un-robust, and are vnot possible to deliver.

HSG/086/LDP2/1 (Land at Myrtle Meadows, Steynton)

This greenfield unconstrained site, promoted by an award winning Housebuilder with a track record in delivering significant numbers of units in the immediate vicinity (indeed alongside) is inherently suitable and deliverable.

The development of this site, informed by considerable work and evidence to date, will see the bringing forward of units in the short term, and early in the Plan period – making a significant contribution to housing land supply and yield in the process.

It is considered that the above change to the Plan in respect to land South of Conway Drive, Steynton is necessary to ensure the soundness of the Plan, whilst the endorsement of the allocation of Land at Myrtle Meadows will enable and ensure a readily deliverable site to come forward, underpinning and supporting the soundness of the plan.