PEMBROKESHIRE REPLACEMENT LOCAL DEVELOPMENT PLAN
EXAMINATION IN PUBLIC STAGE

HEARING SESSION 8

STATEMENT OF OBJECTION

PROPOSED ALLOCATION HSG/003/LDP2/01 LAND NORTH OF BEGELLY FARM, BEGELLY

On behalf of
Mr D Thompstone

Our Ref: 1000.a
Participant Reference.: 4197/1966
Date: October 2024
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1.0 INTRODUCTION

1.1 This Statement has been prepared by Evans Banks Planning Ltd on behalf of its Clients as a continued objection to the proposed allocation of land North of Begelly Farm, Begelly (LDP Ref. No. HSG/003/LDP2/01) as part of the *Pembrokeshire Local Development Plan* (LDP) 2. This Statement has been prepared in advance of our attendance of the relevant session of the Examination in Public and has been prepared in response to the Inspector's issued '*Schedule of Matters, Issues and Questions'* document. The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Deposit 2 stage, which still stand.

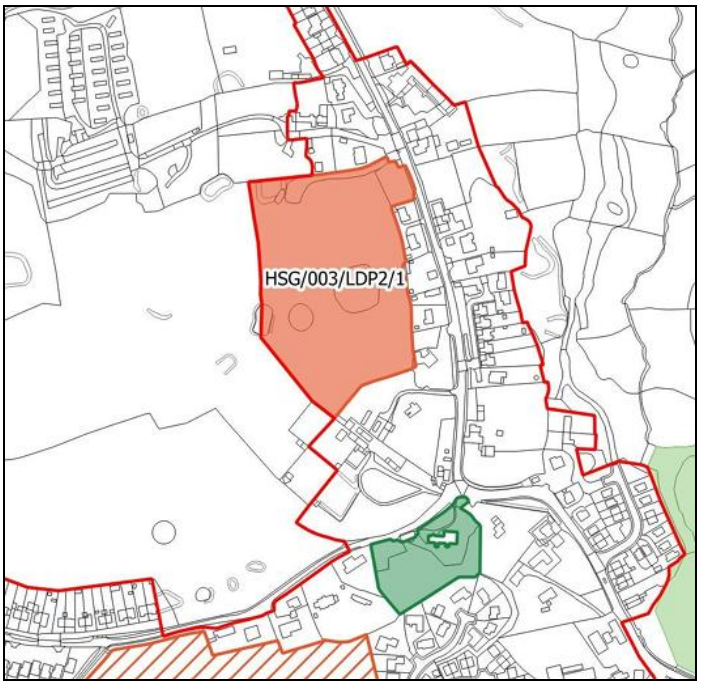
1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the Inspector:

1. What are the constraints affecting the site, and are these constraints significant obstacles
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?
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?
4. What are the mechanisms and timescales for delivering the site?
5. Is the site allocation essential to ensure the soundness of the Plan?

2.0 THE PROPOSED ALLOCATION

2.1 THE SITE

2.1.1 Since the submission of our original objection to the allocation of the land for housing development purposes, the proposed allocation (Plan A) remains unchanged in appearance, although the pocket of woodland at its frontage with the adjoining road has matured further, as illustrated by the photographs below.



Plan A



Photograph 1



Photograph 2

2.1.2 As can be seen above, the site has an undeveloped appearance and is in clear active agricultural use. From a visual inspection, the site would appear to be Grade 3a agricultural land, which is confirmed in the Council's Examination Document ED12e "*Housing Residential Allocation GN16 Settlements B-K*".

2.1.3 Vehicular access to the site is gained via an existing field access track, pictured below, which makes provision for single file traffic to enter and egress the site.



Photograph 3

2.1.4 Pedestrian linkages to the nearby centres of Begelly and Kilgetty from the site are incomplete, resulting in pedestrian sharing the same access routes as vehicles in many instances.

2.2 PLANNING HISTORY

2.2.1 As a new allocation, the site does not currently benefit from any planning history.

3.0 INSPECTOR'S QUESTIONS

3.1.1 This section of our Statement directly provides, where relevant, a response to the aforementioned questions raised by the Inspector, which we will elaborate further on through our attendance of the respective Hearing Session

1. *What are the constraints affecting the site, and are these constraints significant obstacles?*

3.1.2 As detailed above, the allocation in question is an undeveloped area of land with a gentle topography. Due to its Grade 3a status, biodiversity interests are predominantly restricted to hedgerows along its boundaries, as well as individual mature trees within it.

3.1.3 Notwithstanding the above, the most significant and in our view fundamental constraint to the delivery of the site is the area of mature broadleaf woodland at the location of the proposed access to serve the site. As illustrated in Photograph 3, the current means of access falls significantly short of the width required (9.5m) for the provision of an adoptable road with pedestrian footways. To facilitate this form of adoptable highway would require the removal of a significant area of woodland – the loss of a Priority Habitat (Semi-natural Broadleaved Woodland) and overall loss of biodiversity and ecosystem resilience. As a result, the development of the site would be contrary to the requirements of Chapter 6 of *Planning Policy Wales* (PPW) (Edition 12), resulting in this feature representing a significant constraint to the allocation's delivery.

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?*

3.1.4 In terms of detailed viability appraisals, we understand that the Council has only undertaken such exercises for the 'key sites' identified in the LDP, with the housing allocation in question not representing one of these. As a result, we understand no

detailed viability appraisal for the housing allocation in question has been undertaken, despite it being expected to deliver 46 units.

3.1.5 Notwithstanding this, as detailed above, the allocation faces a significant constraint to its delivery. If the area of woodland were removed, under the provisions of the Stepwise approach set out in Chapter 6 of PPW, mitigation would be required. This would need to be in the form of the planting of the same quality and scale of trees removed to a 3:1 ration, as well as the reinstatement of the ground-based broadleaf woodland habitat at an alternative location.

3.1.6 Based on the proposed density for the allocation (taking into consideration of the sensitivities of the proximity of a Listed Building), it would not appear that there is physically enough site within the allocation to mitigate for such significant biodiversity losses. Notwithstanding this, there are significant concerns over the actual ability to mitigate for the loss of the ground-based broadleaf woodland habitat, due to the complexities of this ecosystem type.

3.1.7 On the basis of the above significant inconsistencies, there is no evidence that the allocation can be policy compliant and economically viable.

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?

3.1.8 In view of the above significant biodiversity related constraints, the ability of the allocation to deliver the assigned number of units over the Plan period is put into serious question.

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

3.1.9 We understand from documentation published by the Council that the site is expected to deliver the assigned number of units (46) over the period of 2028-2032. However, we are not aware of any evidence for proposals to overcome the above identified significant biodiversity constraints and so would question this timescale.

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

3.1.10 On its own, the allocation represents just under 1% of the total number of homes expected to be delivered by the LDP during its lifetime. However, the allocation in question, represents the only proposed housing allocation in the settlement and community of Begelly, expected to deliver new homes (including those of an affordable nature) and a range of community benefits. Whilst the settlement also includes 2 longstanding housing commitments, one of these remains undeveloped – despite benefitting from local planning policy support for over 20 years.

3.1.11 The lack of housing being physically delivered within Begelly – despite several allocations – has had a detrimental impact on the settlement's ability to not only grow, but also meet the needs of its local community. The reliance therefore on a new allocation that has clear questions over its deliverability, will only exasperate this situation. Its inclusion as an allocation would therefore lead to the Plan being unsound.

4.0 TESTS OF SOUNDNESS

4.1.1 In summary, on the basis of the evidence submitted in and with this Statement, as well as that already submitted to the Council, it is clear that the allocation of HSG/003/LDP2/01 (Land North of Begelly Farm, Begelly) fails to adhere to the following Tests of Soundness, as required by the *Development Plan Manual*:

- Does the Plan fit?
- Is the Plan appropriate?
- Will the Plan deliver?

4.1.2 It is quite clear that the allocation of the land in question is not consistent with the guidance and requirements of national planning policy (particularly *Planning Policy Wales*), is not appropriate for allocation in light of the evidence, and will clearly, yet again, fail to deliver any new residential units during the Plan period.

4.1.3 As a result, the continued inclusion of the allocation in question would result in the *Pembrokeshire Local Development Plan 2* being unsound and alternative sites such as those promoted on behalf of our Clients should in turn be allocated and included within the Plan, in order to rectify the situation.