PEMBROKESHIRE REPLACEMENT LOCAL DEVELOPMENT PLAN
EXAMINATION IN PUBLIC STAGE

HEARING SESSION 8

STATEMENT OF OBJECTION

PROPOSED ALLOCATION HSG/048/00038 - LAND NORTH OF HAYSTON VIEW, JOHNSTON

On behalf of
Mr M and Mr J Morillo

Our Ref: 1814.a
Participant Reference.: 4375/1966
Date: October 2024
Prepared by: JDE

Office 8, Llys y Piode, Rhodfa'r Glo, Cross Hands, Carmarthenshire, SA14 6FB
Email: info@evansbanks.com **Tel:** 01269 400410 **Web:** www.evansbanks.com

1.0 INTRODUCTION 3

2.0 THE PROPOSED ALLOCATION 4

2.1 THE SITE 4

2.2 PLANNING HISTORY 5

3.0 INSPECTOR'S QUESTIONS 6

4.0 TESTS OF SOUNDNESS 9

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 Hayston View, Johnston (LDP Ref. No. HSG/003/048/00038) 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 The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Deposit 2 stage, which still stand.

1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the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

2.1.3 Access points to the site can be gained via the southern and western boundaries, but as identified in the Council's own assessment documentation, both present issues that will need to be overcome.

2.2 PLANNING HISTORY

2.2.1 With regards then to planning history, the site has been the subject of two previous planning applications for residential development. One submitted in 2008 (LPA ref. No. 08/0472/PA) was withdrawn and a further submitted in 2009 (LPA Ref. No. 09/0455/PA) was refused. No planning applications have since been submitted for consideration and so according to the Council's online records, the site does not benefit from any extant planning permission for residential development.

2.2.2 Despite being allocated for over 10 years, the site has yet to deliver a single residential unit. In fact, the site is devoid of any recent planning history, which in itself questions its availability for development.

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. The Council in its own assessment of the site recognise that its boundaries contain a number of biodiversity interests, including areas used extensively by Badgers and a number of trees subject of Tree Preservation Orders.

3.1.3 In addition to the above, we note that the allocation is also the subject of surface water flooding, as advised by Natural Resources Wales, illustrated by the map extract below.



Plan B

3.1.4 Notwithstanding the above, whilst we would question as to whether the proposed density for the allocation has given full consideration of these constraints, they would

not in themselves represent significant obstacles to its delivery. It is therefore uncertain as to why after over 10 years of allocation, the site remains undeveloped.

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?*

3.1.5 In addition to the above constraints, we understand that the Waste Water Treatment Works that the site would feed into had previously required upgrading to accommodate the foul flow from the site. We understand that these works were completed in 2020, but no development of the site has taken place since.

3.1.6 In terms of detailed financial viability appraisals, the allocation is classed as a 'key site' by the Council and they reach the conclusion that the site is indeed viable.

3.1.7 Notwithstanding that the site appears to be free of significant physical constraints to facilitate its delivery and that it has been concluded to be financially viable to develop it by the Council, the allocation continues to be undeveloped. This therefore in fact puts doubt on its deliverability and economic viability.

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 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 (50) over the period of 2026-2030. However, no evidence has been provided (e.g. copy of a pre-application enquiry, commencement of Pre-Application Consultation exercise etc.) to suggest that progression is being made to see the site delivered within this timescale, bearing in

mind that this could in fact happen under the provisions of current adopted planning policy.

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

3.1.10 On its own, the allocation represents just over 1% of the total number of homes expected to be delivered by the LDP during its lifetime, but its scale would be capable of accommodating more. However, the allocation in question, already represents the principle housing allocation in the settlement and community of Johnston, but has yet to fulfil its anticipated obligation in terms of delivering new homes and community benefits. To rely on it again for a further 10 years, with no evidence of a commitment to delivery 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/048/00038 (Land North of Hayston View, Johnston) 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.