PEMBROKESHIRE REPLACEMENT LOCAL DEVELOPMENT PLAN
EXAMINATION IN PUBLIC STAGE

HEARING SESSION 7

STATEMENT OF OBJECTION

PROPOSED ALLOCATION HSG/093/00066 AT LAND EAST OF POPPY DRIVE, NEYLAND

On behalf of
Mr M and Mr J Morillo

Our Ref: 1814.a
Participant Reference.: 4375/1966
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 East of Poppy Drive, Neyland (LDP Ref. No. HSG/093/00066) 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 The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Deposit 2 stage, which still stand.

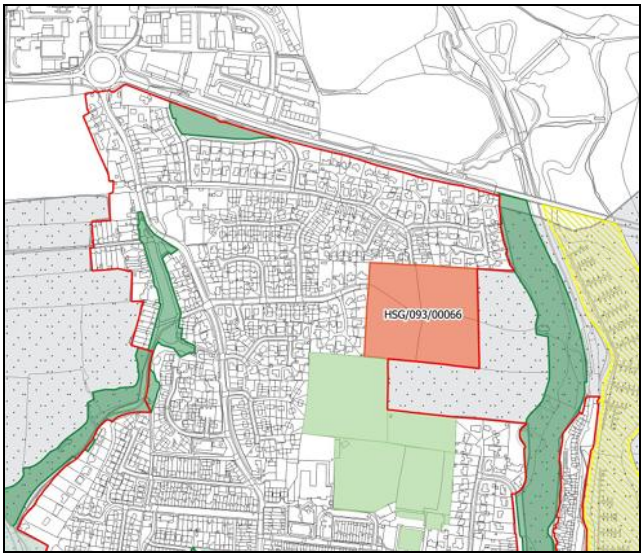
1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the Inspector:

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, 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 2 agricultural land, which is confirmed in the Council's Examination Document ED12g "*Housing Residential Allocation GN16 Settlements N-W*".

2.1.3 Vehicular access to the site is gained directly off Poppy Drive to the east, which we understand is an adopted public highway.

2.2 PLANNING HISTORY

2.2.1 As detailed in our previous submissions, the site is allocated in the current adopted LDP for the purposes of 101 dwellings. It was in fact also allocated for the same purpose in the previous *Pembrokeshire Joint Unitary Development Plan*, adopted in 2006.

2.2.2 Despite being allocated for over 20 years, the site has yet to deliver a single residential unit. In fact, the site is devoid of any 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. Due to its Grade 2 status, biodiversity interests are restricted to hedgerows that divide the fields that make up the allocation. The means of access to serve the site relates to an existing adopted turning head, within which it is assumed would be the usual utility and service connections, by virtue of the presence of existing houses either side of it. According to the relevant records, the allocation is not at risk of flooding, nor does it contain any areas or features of historic interest.

3.1.3 In view of the above, there would appear to be no physical constraints affecting the site, but after over 20 years of allocation, it 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?*

3.1.4 As detailed above, there appear to be no physical constraints to the delivery of the site.

3.1.5 In terms of detailed viability appraisals, we understand that the Council has only undertaken such exercises for the 'key sites' identified in the replacement 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 101 units.

3.1.6 Notwithstanding the above, the Council has provided a limited assessment of the allocation at *Appendix 8 (Allocations rolled forward – evidence of substantial change in circumstances*) of Examination Document *ED08 Initial Questions Letter PCC Response*, with the relevant extract for the allocation in question reproduced below.

Policy	Allocation location and reference number	Rolled forward from current LDP?	LDP 2 Candidate Site submitted?	Recent planning application history?	Recent change of ownership?	Major development constraints recently removed?	Site being prepared for development?	Emerging Freeport proposals?	Other
GN 16	East of Poppy Drive, Neyland HSG/093/00066	Yes	Yes – CS 385	No	No	No	No	No	

Figure 1

3.1.7 It is alarming that in view of the large number of negative responses in the Council's own assessment of the allocation, it still considers it to be both economically viable and deliverable – when no evidence has been published to justify this position.

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 the absence of any evidence – current or historic – to show a commitment to see the land in question developed for housing, its ability 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 (101) over the period of 2027-2033. 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 under 2% of the total number of homes expected to be delivered by the LDP during its lifetime. However, the allocation in question, represents the only current and proposed housing allocation in the settlement and community of Neyland, expected to deliver new homes (including those of an affordable nature) and a range of community benefits.

3.1.11 The allocation's track record of non-delivery as a rollover site is deeply concerning. There are serious questions over its delivery and indeed availability for development and the Council's continued reliance – stretching over 30 years if allocated – on the allocation through its inclusion within the emerging replacement LDP is flawed. 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/093/00066 (Land East of Poppy Lane, Neyland) 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.