

## Potential site analysis for site 733, Adjacent to School, St Ishmaels

Associated settlement     **St Ishmael's**  
LDP settlement tier       **Rural centres**  
Community Council area **St. Ishmael's**  
Site area (hectares)       **2.74**

**Site register reference(s) (if proposed as development site for LDP)** No LDP site registration

### Relationship to designated areas

Within 500 metres of a SAC.

Not within 500 metres of a SPA.

Not within 500 metres of a National Nature Reserve.

Not within 100 metres of a Local Nature Reserve.

Not within 500 metres of a Marine Nature Reserve.

Not within 100 metres of a Woodland Trust Nature Reserve.

Not within 100 metres of a Wildlife Trust Nature Reserve.

Not within 100 metres of Access Land.

Not within 100 metres of a Scheduled Ancient Monument.

Not within 50 metres of a Listed Building.

Within a Historic Landscape Area.

Within 500 metres of a Historic Garden.

Within 50 metres of Contaminated Land.

Not within airfield safeguarding zones for buildings under 15m high.

Not within HSE safeguarding zones.

Not within MoD safeguarding zones for buildings under 15m high.

Not within 10 metres of a Tree Protection Order.

Not within 100 metres of ancient or semi-natural woodland.

Underlying Agricultural Land Classification: 3 (1 is Agriculturally most valuable, 5 is least valuable).

Not within a quarry buffer zone.

No safeguarded route for roads or cycleways.

No Public Right of Way.

Not a Village Green.

## Stage one commentary

Site is not wholly within a Site of Special Scientific Interest; Natura 2000 site; National, Local, Marine, Woodland Trust or Wildlife Trust nature reserve; or Scheduled Ancient Monument.

Does the site pass stage one site criteria tests? **Yes**

## Stage two evaluation

<b>Ownership</b>	David Warren-Davies		
<b>General overview</b>	This is undulating land in agricultural use. There are no general views of the land from public view points, although part of the site can be viewed from the field gate close to the lane to Monkhill in the south-western corner of the site.		
<b>Greenfield or Brownfield/PDL</b>	Greenfield	<b>Estimated number of dwellings</b>	46
<b>Adjoining uses and access</b>	The site is bounded to the north and north west by existing residential development and the village road. To the north east is the primary school and to the east there is further housing, although this is separated from the site by an undeveloped strip of land which has been allocated in the JUDP for residential development. To the south there is a ribbon of housing and a lane serving the farms beyond but with no through access. The only access into the site appears to be from the south western corner where there is a gated field access.		
<b>Visible constraints to development</b>	This is an extensive site but served by narrow and winding roads. This may be a constraint on the number of properties that can be developed.		
<b>Impact on National Park's Special Qualities</b>	The Marloes Peninsula is characterised by open rolling farmland contrasting with more sheltered wooded valleys. The recorded historical and archaeological features area of national importance. The site is within an area of concave landform screened by existing development on a ridge to the south and enclosed by riparian vegetation to the west providing a contained area for rounding off the settlement edge. A low ridge to the west contains views of the site. Development of the site will not adversely affect the special qualities of the National Park.		
<b>Landscape impact mitigation measures</b>			
<b>Affordable housing capacity assessment</b>			
<b>General notes</b>	Further survey and consultation will be necessary to determine the appropriate number of dwellings this site could appropriately accommodate. In normal circumstances it would be reasonable to develop up to 20 properties on this site. However the demand for affordable housing units in this area is greatest for 1 and 2 bedroom accommodation. Taking this into consideration the density of development on this site can be increased to up to 30 one and two-bed units. The site allocation has been linked to an adjacent site originally numbered site 831 which has been assessed to accommodate 15 dwellings, taking into consideration the demand for 1 and 2 bed		

units.

### Development planning history

### Planning application history (planning applications within, overlapping or adjacent to the potential site)

### Summary of geological risk (class A is lowest risk, class E is highest risk)

Running sand class A; compressible ground class A; landslide class C; no soluble rocks; shrink swell class B

### Summary of flood risk (from TAN 15)

Not within a TAN 15 zone

**Public transport service** Services on school days only, summer only or less than weekly.

### Distance from potential sites to selected services in kilometres

Nearest shop	0.36	Nearest doctor	6.06
Nearest pub	0.24	Nearest Dentist	6.83
Nearest primary school	0.14	Nearest secondary school	7.73
Nearest post office	2.84	Nearest petrol station	7.38
Nearest community hall	5.56	Nearest police station	7.28
Nearest letter box	0.2	Nearest library	6.19
Nearest place of worship	0.62	Nearest cash point	4.49
Nearest sports ground	0.5		

\* Distances are in kilometres, 'as the crow flies'

### Consultee responses

Consultee	Date of response	Response
Countryside Council for Wales	29/11/2007	We suggest that conditions on developing this site should include accommodation of the scrub that exists on site already, and links to the above site for ecological continuity.
Dwr Cymru		Study required due to number of proposed units. Lesser number may be acceptable.
PCC Highways		Steve Bengier to visit site. Will advise on 'do nothing' and 'engineered' approaches on access.
Environment Agency Wales	08/01/2008	Concern about localised drainage problems - check with Pembrokeshire engineers and Dwr Cymru. Large site - FAC needed.

Pembrokeshire County Council Drainage	07/04/2008	We do not have any information as to whether the proposed site suffers flooding from the adjacent watercourse. It would be preferable if surface water was disposed to soakaways/SUDS in order not to increase the risk of flooding in the downstream catchment. If ground conditions are not suitable for soakaways/SUDS, any discharges to watercourses in this catchment should be restricted to at least greenfield runoff rates. For your information, ordinary watercourses must not be filled in, culverted, or the flow impeded in any manner, without the prior written consent of the Environment Agency under Section 23 Land Drainage Act 1991. Approval of Pembrokeshire County Council is also required to culvert a watercourse under Section 263(1) Public Health Act 1936.
Dyfed Archaeology	30/05/2008	Within area of possible burnt mound. Sites including either known or probable remains, which should be preserved and incorporated into, appropriate development designs. Sites within this category are unlikely to prevent development, however any impact upon archaeological remains will require appropriate mitigation. This is likely to include the retention of features where possible, and the investigation, recording and analysis of all threatened remains.
Pembrokeshire County Council Highways Authority	02/09/2009	In design terms I would try to seek a second access for this potential development to prevent a cul-de-sac development; however it is clear that there is no opportunity for this. It is feasible to create a suitable single access next to the school although this would require hedge/tree loss or require traffic calming to make this possible. Therefore as there is no overall safety objection to a single access we would be willing to consider the single access for a development providing it remains less than 50.
Pembrokeshire County Council Education Authority	03/09/2009	I would confirm that we would wish to retain the land previously identified for any further potential extensions, arising out of any future housing developments.
Pembrokeshire County Council Education Authority	08/12/2008	our main areas of concern relate to our responsibility to protect the long term future of the school and to make improvements to the parking areas and general access to the school. In particular we are concerned of the possibility of housing bordering the school on three sides. Furthermore, we are in preliminary discussions regarding possible additional accommodation at the site and this would result in some of the play areas being used for this purpose. As a result, we would require land to be reserved for educational use at both the south and east of the site (see the hatched areas on the attached site plan). As a guide, we would require approximately 20 metres and 10 metres strips at the south and east respectively.

The site visit which was preceded by a desk-top study of the site, was undertaken in response to a report received by CCW of otters using the site which was passed to PCNPA for consideration. The otter is a European Protected Species (EPS). As such it and the places that it uses, e.g. for resting, breeding, rearing of young are protected at all times under UK and European laws. Otters are a feature of the Pembrokeshire Marine SAC, and are also a UK and LBAP priority species. Surveillance of otter populations within the SAC has confirmed that the Milford Haven Waterway, including intertidal areas, and most (if not all) of the little stream valleys that open on to the Haven are used extensively by otters.

Following the desk-top study of available information and species records, a site visit was undertaken to evaluate the biodiversity interest of the land in question and to assess the potential implications of this allocation for any otters that might be present in the area.

## 2 Desk-top study.

This comprised enquiries to the West Wales Biodiversity Information Centre (WWBIC), concerning existing biological data for a search area of 1km radius of the site. Information supplied by WWBIC is summarised below.

### 2.1 Habitats

The phase 1 map showed the site as improved permanent pasture, bordered on the western boundary by a small stream lined with mature scrub and trees. Further downstream, the watercourse occupies a narrow wooded valley which opens onto the coast at Monk Haven. The stream is fed by springs to the north of the village, and is linked by a tributary stream to a group of four farm reservoirs (Bicton Reservoir, Castle Reservoir and North Hall Farm Reservoir). The stream flows through the village of St Ishmaels where it is partially culverted.

### 2.2 Species

The search did not reveal the presence of any protected or priority species, other species of conservation concern or that are locally important on the site or on land immediately adjacent to the site. The watercourses in this area however are known to be used by otters, and the distribution of records in the area suggests that the watercourse that runs through the village, on the western side of this site, are frequented by otters.

## 3 Summary of observations made during the site visit

### 3.1 Site reference no MH 733

Observations made on site confirmed that the land comprises permanently improved pasture of limited biodiversity value. The grass swards are dominated by species such as perennial rye grass, Yorkshire fog, cocks-foot, annual meadow grasses, and tall or false oat-grass.

Other flowering plants include broad-leaved dock, white clover, plantains, spear and creeping thistle, nettles (indicating localised nutrient enrichment) and creeping buttercup.

On the eastern most parts of the site the flora is a little more diverse, with species such as hedge woundwort, common toadflax, ragwort and hogweed. Bramble is encroaching and garden escapes such as buddleja were noted.

The site is bounded on the western side by a linear strip of dense, mature scrub comprising blackthorn, hawthorn, elder and grey willow.

Mature trees include sycamore and ash.

### 3.2 The stream corridor on the western side of the site.

The land slopes down to the streams from the boundary of the site, and is part of a narrow corridor of dense, structurally diverse scrub, marshy grassland and (further downstream), broad-leaved woodland. This area is relatively undisturbed, and provides very good habitat for a range of species, including otters (during the site visit, several species of butterflies including silver washed fritillary were noted). The stream and its wooded valley are very important in terms of local biodiversity.

## 4. Assessment of the potential impacts of the allocation of site MA733 for development on biodiversity.

The site has been proposed for an allocation for low density housing. The site itself has, as indicated above, relatively low intrinsic value for biodiversity, in contrast to the stream corridor on the western side of the site, which has very high local biodiversity value and which supports at least one European Protected Species (otter). It should be noted that although the focus of the desk study and site visit was the otter, it is highly probable that the stream corridor is important for other protected species, notably bats.

The risk of potential impacts the allocation, on general biodiversity interest and on the otter in particular are assessed as follows:

### 4.1 General biodiversity including habitats.

- The site: risk of negative impacts is assessed as negligible.

- Adjacent areas of high biodiversity interest:

Risk of some physical disturbance along the boundaries: moderate, but can be reduced to “negligible” through the Development Management process (mitigation could include careful design/site lay-out including access, incorporation of the buffer zones to protect the boundaries, use of best practise on site, protection of water quality in watercourses).

Risk of significant impact on a small marshy meadow which is of local biodiversity importance if the access to the site is provided as currently proposed. This little meadow provides good cover for otters using the watercourse, and comprises marshy grassland which is a UK and LBAP priority habitat. In this instance, mitigation against impacts would be very difficult, and an alternative access should be identified, if at all possible.

Appropriate mitigation measures would reduce the risk of negative impacts to “negligible”.

#### 4.2 Protected species: otter

Direct impacts, e.g. loss of habitat; disturbance: subject to appropriate mitigation outlined above being put into place, the risk of negative impacts is considered to be negligible (if any).

Indirect impacts, e.g. on water quality: if it goes ahead, development on this site would be connected to the main sewerage system. SUDS will also help to limit the quantity of potentially contaminated storm water and general run off from the site entering local watercourses, thus further reducing the risks to water quality hence of indirect impacts on otters using the watercourse.

#### 5. Summary.

To summarise, the risks of impacts on local biodiversity and on protected species (otter) as a result of this allocation are thought to be negligible and avoidable through the Development Management process. It is however, recommended that in view of the fact that the otter is a feature of the Pembrokeshire Marine SAC, any planning application(s) that is/are subsequently made to the Authority as a result of this allocation should be screened as individual plans or projects for likely significant effect under Regulation 48 of the 1994 Habitats Regulations.

Environment Agency	22/04/2009	No constraints. Minor Aquifer.
Environment Agency	13/07/2009	Ordinary watercourse runs through the site.

Pembrokeshire County Council Highways	22/10/2008	Further to our site meeting on the 21st of October regarding access to potential development land in St. Ishmaels, please find attached a sketch plan indicating a suitable first phase access to the land in question. (This map indicates an access into the site in the north-western corner).
		<p>From this access it is considered that a development of no more than 30 could be adequately served, however on completion of a second access adjacent to the school a further 15-20 could be considered. It does not seem likely that much development beyond this could be considered due to the generally poor infrastructure in and around St. Ishmaels, including poor access into St. Ishmaels, generally single track roads in the village, very few footways, little in the way of day to day facilities which are easily accessible and insufficient public transport provision. It is possible that after this land is developed a critical mass may be reached where improved public transport could be provided, which may improve prospects for future development.</p>
Pembrokeshire County Council Drainage	26/01/2009	<p>The development of this site would appear not to affect ordinary watercourses. It would be preferable if surface water was disposed to soakaways/SUDS in order not to increase the risk of flooding or exacerbate existing flooding in downstream catchments. If, however, ground conditions are not suitable for the use of soakaways/SUDS or positive drainage systems are required for adoption purposes, then any conventional drainage system discharging to watercourse either directly or indirectly, should include measures to improve the status quo.</p> <p>It should be noted that ordinary watercourses must not be filled in, culverted, or the flow impeded in any manner, without the prior written consent of the Environment Agency under Section 23 Land drainage Act 1991. Approval of Pembrokeshire County Council is also required to culvert a watercourse under Section 265(1) Public Health Act 1936.</p>



Pembrokeshire County Council Drainage

26/01/2009 There would appear to be ordinary watercourses within the proposed development site. The layout of any development would need to take account of these watercourses in order that access can be maintained for maintenance purposes. We do not have any information as to whether the proposed site suffers flooding from these watercourses. It would be preferable if surface water was disposed to soakaways/SUDS in order not to increase the risk of flooding or exacerbate existing flooding in downstream catchments. If, however, ground conditions are not suitable for the use of soakaways/SUDS or positive drainage systems are required for adoption purposes, then any conventional drainage system discharging to watercourse either directly or indirectly, should include measures to improve the status quo. It should be noted that ordinary watercourses must not be filled in, culverted, or the flow impeded in any manner, without the prior written consent of the Environment Agency under Section 23 Land drainage Act 1991. Approval of Pembrokeshire County Council is also required to culvert a watercourse under Section 265(1) Public Health Act 1936.

**Reasons site is suitable for development**

Site well screened from view and virtually contained by existing development.

**Reasons site is not suitable for development**

**Does the site pass stage two tests?** Yes

**Proposed use** Mixed

**Stage three: Sustainability Appraisal**

**Sustainability Objective**

**Summary**

**Commentary**

1	+	The land is not top grade agricultural land.
2	-	The site is within walking distance of the small range of services available in St Ishmaels. The only bus service to the village is irregular and does not offer a realistic alternative to the car. The proposals at this site are unlikely to create sufficient demand to improve the bus service to the village, although combined with other proposals for this village, Marloes, Herbrandston and Dale there may be scope for developer contributions or increased demand to improve the service available.
3	+	This site is within a concave landform and is screened by existing development on a ridge to the south and enclosed by riparian vegetation to the west.
4	0	Though the development will increase the population and therefore the pool of residents that could be taking part in physical recreation, the Sustainability Objective seeks a change in behaviour such that a greater proportion of residents and non-residents are taking part in

		physical recreation in the Park, and therefore enjoying the health benefits.
5	0	The development will not achieve this aim.
6	+	The site is not within an area liable to flooding. Development should incorporate energy efficiency and sustainable development principles.
7	+	Housing will be built according to the sustainable design policies of the Plan requiring the highest standards for energy efficiency.
8	++	The site can be used to accommodate a range of housing, including, identified need for affordable housing. Development will also help to sustain services locally.
9	+	The site can be used to accommodate identified need for affordable housing.
10	+	This is a large development within St Ishmaels and other sites have also been identified in the village. Phasing will be required to protect the culture of this community. A positive outcome is dependent on a large proportion of the housing being available at an affordable rate to people from within the community.
11	0	Development of an individual site is irrelevant to this Sustainability Objective, as its goal is to avoid negative effects of minerals acquisition wherever and whatever the use of those mineral products.
12	0	Development here is likely to marginally increase waste, though this inevitable and the only way to avoid this would be to have no development and no increase in population (in or outside the Park, as displacement of the waste generation would not eliminate its harmful effects).
13	+	The Authority does not have SPG in place on developer contributions which would help inform this element of the appraisal. No needs other than those identified by statutory consultees are currently apparent apart from affordable housing.
14	+	Open spaces should be retained within the site to accommodate existing scrub. There may be opportunity to enhance the biodiversity of the site through the planning process.
15		Policy 17, Sustainable Design aims to make efficient use of water resources. Issues relating to water quality are addressed at Stage 2 and through the Habitats Regulation Screening and Assessment at Stage 5.

### Overall Sustainability Appraisal

With the potential for the development of a significant number of units in Herbrandston, St Ishmaels, Dale and Marloes improvement of the bus service to these villages will be required to allow non-car access to a wider range of services and facilities. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.

**Is the site acceptable for development after Sustainability Appraisal**    Yes

### Stage four: compatibility with the Preferred Strategy

Is site within or adjacent to named centre?    Yes

Is the proposed use listed as appropriate for the centre? Yes

Is the provision consistent with the scale of development proposed for

St Ishmaels is a Tier 4 Rural Centre. For Tier 4 Rural Centres & Tier 5 Countryside a figure of 67% of what would be anticipated if projection figures were achieved is identified (1,141 versus 763). The focus of development has been placed on the Rural Centres which are more sustainable locations for development.

Development in this settlement is concentrated on a single site of 30 dwellings and this will need to be phased.

Is the provision meeting an identified need in the centre?

The needs of Tier 4 Centres are considered together in the previous response.

If greenfield, are there sufficient brownfield sites to avoid choosing this one?

The site is a greenfield site. There are insufficient brownfield sites.

Overall stage 4 assessment

The site is within or adjacent to named centre in the Strategy. A use is proposed which is considered appropriate as per the Strategy.

The level of provision is higher than might be expected to be achieved using Welsh Assembly Government population projections. A greater focus has been placed on Rural Centres which are more sustainable locations for development than the wider countryside.

Development here is concentrated on a single site of 46 dwellings and this has been phased – Table 8.

**Is the site compatible with the preferred strategy? Yes**

### **Stage Five: Habitat Regulations Assessment**

For more information see the Habitats Regulations Screening and Appropriate Assessment reports

The site is within 500m of Pembrokeshire Marine SAC. Pembrokeshire Marine SAC to the north, south and west. Potential effects arising from the allocation include increased recreation and an increase in diffuse pollution.

Dwr Cymru's response (29/11/07) to consultation on this site states that a study is required due to the level of development proposed. "Lesser number may be acceptable". The number of units proposed has increased since consultation. EAW in response (08/01/81) to consultation on this site have a "concern about localised drainage problems".

Potential effects:

Reduce Water Quality;  
Increased Disturbance.

The Appropriate Assessment concluded no adverse effect on integrity as the level of development proposed in the LDP is small and there is suitable protection and mitigation measures provided within Plan policies.