

Application Ref NP/22/0621/FUL
Case Officer Andrew Richards
Applicant Mr R Greaney
Agent Miss Laura Fower
Proposal Proposed development of 72 residential units
Site Location Land East of Sandy Hill, Saundersfoot, Pembrokeshire SA69
9DR
Grid Ref SN12860406
Date Valid 21-Oct-2022 **Target Date** 11-Apr-2024

This application is being considered by the Development Management Committee as it involves a major development.

Summary

The application site comprises two large sections of existing agricultural fields immediately west of Sandy Hill Park residential estate within Saundersfoot. The site is an area of land allocated for residential development within the National Park Local Development Plan 2 (LDP2).

Planning approval is sought for the construction of 72 No. dwelling houses and apartments together with the formation of estate roads and associated infrastructure. This would include 47 full market dwellings and 25 affordable housing units.

Following consideration of the policies contained within the statutory Development Plan (Future Wales and Local Development Plan 2) and National Planning Policy in the form of Planning Policy Wales (Edition 12) and having regard to all material considerations it is considered that the development will be in accord with the Development Plan and the development is considered to provide a development which is acceptable in principle and can be supported by officers subject to receipt of an appropriate legal agreement to secure necessary planning obligations for the site.

Therefore, based on the above the Officer recommendation is that the application be delegated to the Chief Executive, Director of Planning or to the Development Management Manager to issue consent subject to receipt of a Section 106 legal agreement addressing the provision of Affordable Housing, Open Space and financial contribution towards the Active Travel Route and subject to the conditions listed below, provided that the legal agreement is received within 3 months of the decision date.

The relevant plans and supporting documentation can be found on-line at - [Citizen Portal Planning - application details \(agileapplications.co.uk\)](https://citizenportal.planning.gov.uk)

Consultee Response

St Mary Out Liberty Community Council: No response received
PCNPA Access Manager: No adverse comments raised
PCNPA Tree and Landscape Officer: Conditional consent
PCNPA Ecologist: Conditional consent
PCC Transportation and Environment: Conditional consent

PCC Director of Education: No response received
PCC Drainage Engineers: SAB approval required
PCC Community Services: No response received
PCC Community Regeneration Manager: No response received
PCC Cultural Services: No response received
PCC Waste and Recycling: No response received
Natural Resources Wales: Further verbal report to be given at the committee meeting
Welsh Water: Conditional consent
Western Power: No response received
Wales and West Utilities: Add informative to any approval granted
Coal Authority: No objection subject to informative being added to any approval granted
Saundersfoot Community Council: Are not in support of the planning application. The council would like a definition from the developer on what constitutes an affordable home. The community council would like to add the caveat that no property is bought for 2nd home holiday use.

Refusal based on the following concerns raised:

The Council would like it noted that a request was made to both the planning authority and the land developers for a site visit prior to it considering this application, on both occasions these requests was denied.

- The proposed plans do not preserve nor enhance the character nor appearance of the area in which the development is proposed, potentially causing an imbalance of the aesthetics of the remaining green areas which edge part of the village of Saundersfoot.
- The proposed plans would be dominant, overbearing, and intrusive to the residents already living within the area.
- The proposed development would be accessed from an already problematic stretch of single lane road with traffic passing bays and a bus stop adding to the negative impact of safety. These passing bays, offering safe areas for larger vehicles (busses, refuse lorries and emergency vehicles) to pass will be 'swallowed up' within the infrastructure to the proposed site's entrance.
- Loss of amenities to the existing residents. Loss of green space, wildlife, and fauna.
- The hedgerows depicted on the plans are also depicted on the 1836's tithe map and of historic value.
- Major concerns have been raised by this Council in the past, and continue to be ongoing, relating to vehicles speeding on the access roads to the village. Additional vehicles accessing the proposed development would add considerable to this ongoing safety problem.
- The proposed three-story buildings are not within keeping of any in the surrounding area and will alter the skyline immensely.
- Infrastructure – concerns have been raised regarding the existing sewer system and water supply. There are three major proposed developments within Saundersfoot, following the new Local Development Plan, and if all or some are successful will the existing infrastructure be able to accommodate such.

- Highways – the proposed site is accessed off a narrow, single track county road. With a proposed number of 70 dwellings with a potential of an average of 2 vehicles, over 140 extra vehicles, each using the narrow track road. With the increased volume of traffic at peak times of the day, travelling to and from school and work, this single-track road has the potential of becoming blocked and grid locked.
- Local services:
 - Doctors Surgery – are there places to maintain an acceptable service of care to all residents of the Ward.
 - Schools – with potentially three major developments is the school able to offer places to all that require them.

Saundersfoot Community Council does not support this planning application and request the Planning Authority consider refusing such.

Public Response

A site notice was erected and neighbour notification letters were posted in accordance with requirements of the Town and County Planning (Development Management Procedure) (Wales) Order 2012.

Several letters of objection have been received and their concerns relate to the following:

- Ribbon development
- Highway safety
- Traffic generation
- Removal of hedgerow and trees
- Affordable housing
- Impact on biodiversity
- Impact on local School
- Impact on doctors surgery
- Impact on dentist
- Overload on existing services in general
- Pressure on local parking
- Risk of flooding on nearby residents
- Second homes/holiday lets
- Loss of value to adjacent properties
- Surface water drainage
- Foul Water discharge and capacity of local treatment works
- Noise disturbance
- Loss of green belt
- Over development, layout, and density
- Outdoor play facilities
- Displacement of parking spaces on adjacent residential units
- Overlooking to existing neighbours
- Lack of accessibility to flat development on upper floors
- Parking provision on site lacking
- Overshadowing

- Loss of amenities
- Inappropriate materials
- Waste collections
- Use of garages as storage areas
- Lack of public transport
- Development needs to support pedestrian links within Saundersfoot area

The report below addresses the material considerations raised above.

Policies Considered

Planning applications need to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. The development plan comprises two documents, namely:

- Future Wales, The National Plan 2040 (Future Wales), published by Welsh Government on 24 February 2021. On page 149, it states that *“Policies 4 and 5 will help to ensure that rural areas in the South West grow in an appropriate way, supporting rural economies and services.”* On page 104, Future Wales states that *“National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas...”* and that *“Future Wales policies respect the functions of National Parks in terms of their statutory purposes...”*
- The Local Development Plan (LDP2)

Policy Hierarchy:

Planning Policy Wales (Edition 12)

TAN's –

2, 5, 6, 11, 12, 15, 16 and 18

LDP2 Policy's –

1, 4, 8, 9, 11, 14, 16, 29, 30, 32, 34, 46, 47, 48, 50, 51, 52, 54, 55, 59 and 60

SPG's –

Affordable Housing

Landscape

Planning Obligations

Biodiversity

Coal Works – Instability

Parking Standards

Sustainable Design & Development

Trees and Woodlands

Constraints

LDP Allocation

LDP Green Wedge

Biodiversity Issue

Potential for surface water flooding
Recreation Character Areas
Low Coal Risk
Surface Coal
High Coal Risk
Affordable Housing Submarkets
Landscape Character Area

Officer's Appraisal

Background and History

The application site comprises two large sections of existing agricultural fields immediately west of Sandy Hill Park residential estate within Saundersfoot. The fields are irregular in shape and have ground levels which fall away from the adjacent housing estate and also from the adjacent C3076 access road. An existing field access gateway is currently located within the south west corner of the site and a further field access into the adjoining field to the north east is provided within the site.

The site is situated approximately 0.8 miles from the retail core of Saundersfoot which is designated as a local centre. The site also abuts an existing green belt to the south east and Saundersfoot railway station is a mile from the village centre off the B4316 road. The site is well served by a bus route to Saundersfoot or Tenby via New Hedges.

The site is allocated for residential development under HA2 within LDP2 which indicates that the site area is 2.26 hectares and is allocated for 68 residential units with 24 (35%) of those units indicated for Affordable Housing.

A pre-application enquiry was submitted for this development under reference PA/20/0147 to assess the relevant planning obligations required to submit a formal planning application. No other planning history has been identified for this site.

Current Proposal

Planning approval is sought for the construction of 72 No. dwelling houses and apartments together with the formation of estate roads and associated infrastructure. This would include 47 full market dwellings and 25 (35%) affordable housing units split into 4 (17%) low-cost home ownership units and 21 (83%) social rented units.

The current scheme includes a single access road off Sandy Hill Road providing a centre spine road with smaller estate roads leading off this within the site. The site will be serviced and include a Local Equipped Area for Play (LEAP) (open space provision) within the centre of the site adjacent to the spine road. To the south of the site an attenuation basin will be incorporated to collect surface water and a pumping station will be located in the south east corner to control foul water discharge from the site. An active travel route has also been accommodated within the site and runs parallel to the C3076.

The plans submitted with the application show an indicative site layout of 72 houses comprising the following house types:

Open Market Dwellings

Alnmouth – 3 No (2 bed)
Danbury – 12 No (3 bed)
Chiltern – 3 No (3 bed)
Galloway – 10 No (3 bed)
Kingley – 3 No (3 bed)
Sherwood – 3 No (3 bed)
Charnwood – 1 No (3 bed)
Barnwood – 4 No (3 bed)
Rivington – 3 No (4 bed)
Lambridge – 3 No (4 bed)
Kielder – 2 No (4 bed)

Affordable Housing Dwellings

Cranbourne – 12 No (1 Bed)
Danbury – 10 No (2 bed)
Saunton – 2 No (3 bed)
Braunton – 1 No (3 bed)

The residential units within the development will comprise a mix of 2, 2&1/2 and 3 storey houses and apartment blocks.

Key Issues

The application raises the following planning matters:-

- Policy, Principle of Development, and Impact on National Park
- Housing Mix, Type and Affordable Housing
- Planning Obligations
- Siting and Sustainable Design
- Amenity and Privacy
- Transportation
- Landscaping
- Biodiversity
- Land Stability
- Land Drainage
- Other Matters

Policy, Principle of Development and impact on the National Park:

Section 38 of The Planning and Compulsory Purchase Act 2004 requires that in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the National Park comprises Future Wales (the National Plan 2040) and the Local Development Plan 2.

Future Wales – The National Plan 2040 (FW) which was adopted on 24th February 2021 and is the National Development Framework for Wales – is the national tier of the Development Plan. Policy 4 Supporting Rural Communities states that Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies to support them. On page 104, Future Wales states that: “National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas...” and that “Future Wales policies respect the functions of National Parks in terms of their statutory purposes...”

Policy 1 (National Park Purposes and Duty) of the Pembrokeshire Coast National Park Local Development Plan 2 (LDP2) sets out the National Park’s purposes and duty, in order to ensure that development within the Park is compatible with these.

Policy 4 (Saundersfoot Local Centre) of LDP2 identifies the land use priorities for Saundersfoot which is designated a Local Centre within the Plan. Priorities include providing for and or permitting housing to facilitate the delivery of the affordable housing needs of the local area (criterion a). Proposals should also ensure that developments permitted contribute to the protection and enhancement of the village’s special qualities (criterion d).

Policy 50 (Housing Development Proposals) of LDP2 sets out where housing development proposals will be permitted – this includes locations within centres on sites allocated for housing.

Policy 47 (Housing Allocations or Land with Planning Permission) identifies this site as HA2 Land at Sandy Hill which is allocated for an anticipated 68 market homes with an indicative affordable housing requirement of 35%.

The proposed development is located on land allocated for housing as part of the adopted Local Development Plan. In accordance with Policy 50 (Housing Development Proposals) and Policy 47 (Housing Allocations or Land with Planning Permission) this is a location therefore in which the principle of residential development is acceptable.

The proposed development is for 72 residential units, of which 25 (35%) are proposed as affordable homes. The number of residential units is slightly above that as estimated for delivery in Policy 47, but reflects the percentage of affordable housing required as part of the allocation.

Subject to a Section 106 legal agreement securing the delivery of affordable housing in perpetuity, and in line with the Authority’s adopted Supplementary Planning Guidance on Affordable Housing, the proposed development is considered appropriate in terms of policy relating to Affordable Housing provision. As the proposed development will delivery affordable housing in line with the percentage required by Policy 47, the scheme is considered to comply with the requirements of Policy 4 (Saundersfoot Local Centre) in providing for housing to facilitate the delivery of the affordable housing needs of the local area.

The principle of the development is therefore acceptable in terms of residential use and affordable housing provision (Policy 4 Saundersfoot Local Centre criterion a,

Policy 47 Housing Allocations or Land with Planning Permission and Policy 50 Housing Development Proposals) through the allocation of the land in LDP2. Detailed matters of design and landscaping and how these relate to the special qualities of the village are considered below. Subject to the acceptability of these detailed matters, the proposal will also be considered to meet the requirements of Policy 1 National Park Purposes and Duty and criterion d of Policy 4 Saundersfoot Local Centre.

Concerns have been raised with regard to the proposed development and its potential impact on local schools, doctors surgery, dentists, overloading on existing services in general, loss of green belt and loss of amenities. In respect of the concerns raised, the allocation of housing sites within designated centres reflects an identified need for this type of housing provision through the LDP2 process.

Housing provision supports the delivery of much needed affordable housing which is identified as a strategic objective for LDP2. Where a development generates a need for additional infrastructure to support it, this can be delivered through planning obligations, as detailed below. Requirements for planning obligations where necessary will be delivered through a S106 legal agreement.

A further concern was raised in respect of the loss of loss of green belt.

Policy 16 (Green Wedges) seeks to prevent the coalescence of Centres, protect the setting of Centres and safeguard the countryside. It is considered that the site boundary abuts the boundary of GW28 (West of Rushylake Bridge Saundersfoot) and therefore does not impact directly or result in the loss of any green wedge.

Housing Mix, Type and Affordable Housing:

Policy 47 (Housing Allocations or Land with Planning Permission) identifies this site as HA2 Land at Sandy Hill which is allocated for an anticipated 68 market homes with an indicative affordable housing requirement of 35%.

Policy 48 (Affordable Housing) requires private market housing to provide 50% affordable housing, however as this site is designated as an allocated site the site allocation requirements as identified above takes precedent as it is based on more localised viability testing undertaken as part of LDP2 development. This is also relevant where the development proposed increases the overall numbers of residential units, thus the 35% affordable housing requirement remains.

Policy 52 Housing Mix states that in order to ensure the creation of balanced communities all new housing development will be required to include a mix of dwelling sizes, types and tenures having regard to current evidence of need.

The current proposed development has increased overall numbers up to 72 residential units of which 47 full market dwellings and 25 (35%) affordable housing units split into 4 (17%) low-cost home ownership units and 21 (83%) social rented units to meet the requirements set out within LDP2 for this allocated site.

Information from the most recent Local Housing Market Assessment indicates that the proposal is in-line with the housing need for this area. In addition the proposed Affordable Housing mix of 83% social rented and 17% low-cost home ownership is in-line with the requirement set out in the adopted Affordable Housing Supplementary Planning Guidance. Mechanisms to ensure that the affordable housing is delivered in line with these percentages and retained as affordable housing in perpetuity can be put in place via a signed S106 legal agreement.

The Planning Statement provided in February 2024 confirms that the proposed development includes a mix of units including 1 bed, 2 bed, 3 bed and 4 bed dwellings.

The proposed Affordable Housing Type and bedroom number is set out below:

Affordable Housetype	Beds	Number	Percentage
Cranbourne (CR) (R25)	1	12	48%
Danbury (DA) (R21G)	2	5	40%
Danbury (DA) (R25)	2	5	
Saunton (SA) (R25)	3	2	12%
Braunton (BR) (R25)	3	1	
Total		25	100%

Evidence from the Local Housing Market Assessment shows there is a high level of existing unmet affordable housing need in the Housing Market Area of Saundersfoot. Evidence from the latest Local Housing Market Assessment 2024, undertaken in accordance with the latest Welsh Government methodology and awaiting Welsh Government approval identifies an annual affordable housing need in the Housing Market Area of Saundersfoot of 13 affordable units per year, or 192 affordable units over a 15 year period. This figure is based on the Welsh Government's Principal Projections. Alternative growth scenarios indicate that the affordable housing need would increase to 18 affordable dwellings per annum or 273 affordable units over a 15 year period with a growth scenario which reflects the adopted LDP 2 growth scenario.

The level, mix and type of affordable housing is considered appropriate when assessed against the known need for Saundersfoot.

The agent has also confirmed that the residential units set to accommodate the affordable housing units will meet the relevant Beautiful Homes standards. With regards to whether or not it is appropriate to apply a planning condition limiting the use of the market houses to C3 primary dwellings only and therefore preventing use as a second home or holiday let, the Authority has undertaken an assessment based on its established methodology. This assessment, which is set out in full in Appendix 1 of this report, demonstrates that there is not a sufficient justification in this case to impose such a condition. Whilst Saundersfoot as a whole has a slightly higher percentage of second homes and holiday lets than was anticipated when the

LDP2 was developed, the majority of detached properties of the estate style type proposed as market dwellings on this site in Saundersfoot are occupied as primary dwellings. It is the flat or apartment style properties that are more likely to be occupied as a holiday let or second home, however within the development these properties will already be controlled as they are designated as affordable housing. There is therefore no need to apply a use class condition to the properties, based on the evidence gathered.

Planning Obligations:

Consultations have been carried out with all the relevant consultees and the responses received have been addressed below.

Policy 55 (Infrastructure Requirements) notes that planning permission will be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure services and community facilities made necessary by the development.

It notes that arrangements for provision or improvement to the required standard will be secured by planning conditions attached to a planning permission, or in some cases planning obligations. More guidance on Planning Obligations is set out in the Authority's adopted Planning Guidance Supplementary Planning Guidance (Planning Obligations SPG) document. This document states that the Local Planning Authority will secure Planning Obligations in order to ensure that local services and infrastructure have adequate capacity to meet the additional demands arising from new development.

The SPG notes that in cases where Section 106 contributions cannot be met fully these will be expected to demonstrate the economic viability of a scheme is impacted through a Development Appraisal Toolkit.

Welsh Office Circular 13/97 "Planning Obligations" and Regulations 122 and 123 of the Community Infrastructure Levy Regulations 2010 also apply to the consideration of planning obligations.

The Tests in Circular 13/97 Planning Obligations apply to all Planning Obligations, including those not covered by the CIL Regulations. The tests make it clear that a Planning Obligation must be:

- Relevant to planning;
- Necessary to make the proposed development acceptable in planning terms;
- Directly related to the proposed development;
- Fairly and reasonably related in scale and kind to the proposed development; and
- Reasonable in all other respects.

In addition, Regulation 122 of the CIL regulations stipulate that: "A planning obligation may only constitute a reason for granting planning permission if the obligation is:

- a) Necessary to make to the development acceptable in planning terms;
- b) Directly related to the development; and

c) Fairly and reasonably related in scale and kind to the development’.

Regulation 122 of the CIL Regulations places into law the Welsh Government’s policy tests on the use of Planning Obligations. The CIL Regulations reinforce the purpose of Planning Obligations in seeking only essential contributions to allow the granting of planning permission, rather than more general contributions that are better suited to a Community Infrastructure Levy (CIL).

The Authority does not charge CIL. If a Planning Obligation is capable of being charged to CIL, even in cases where CIL is not in operation, it is unlawful for a Planning Obligation to be taken into account when determining a planning application for a development if the obligation does not meet the three tests. In such a circumstance, the decision to grant planning permission would also be unlawful. For all other developments (i.e. those not capable of being charged CIL), the tests in Circular 13/97 will continue to apply.

Policy 15 (Open Space) states that provision of new Open Space will normally be sought from housing developments of 1 or more dwellings. The type and nature of provision will be determined by the size and location of the development and can take the form of on-site provision, contributions for off-site open space, or a mixture of the two.

Concerns have been raised regarding the development and the lack of outdoor play facilities.

Recreational and Amenity Open Space:

In the case of this development, amendments received to the scheme whilst submitted resulted in a layout of 72 dwellings. In accordance with the Authority’s adopted Supplementary Planning Guidance on Planning Obligations, 72 dwellings is the trigger for the provision of an on-site Local Equipped Area for Play (LEAP). Accordingly, the applicant has included provision for a LEAP within the proposed layout for the site. Subject to a Section 106 legal agreement establishing a management company to oversee the ongoing management and maintenance of the LEAP, this is considered to meet the requirements of Policy 15 (Open Space).

Sustainable Transport Facilities:

Pembrokeshire County Council (PCC) Highways have confirmed that a financial contribution of £2,000 per dwelling is required to cover the contribution towards Active Travel Routes within the local area (Saundersfoot Harbour to New Hedges).

Biodiversity:

Biodiversity enhancements as indicated within relevant section of the report.

The remaining planning obligation areas, which covers education, public art, community facilities, library services and waste, have been considered and at this time do not require any additional contributions to those indicated above.

The financial contribution listed above will be included within the Section 106 legal agreement being drafted and will set out how and where this money will be allocated and the relevant stage payments where appropriate.

A completed legal agreement to secure the planning obligations and affordable housing has not been received to date and this aspect will be addressed within the recommendation below.

The above aspects are considered to address the concerns raised regarding outdoor play facilities.

Siting and Sustainable Design:

Correspondence has been received which raises concerns of over development, layout, and density, ribbon development and the use of inappropriate materials.

Policy 8 of LDP2 is a strategic policy which refers to the special qualities of the National Park and lists priorities to ensure that these special qualities will be protected and enhanced. Particularly relevant to this application is area priority a): sense of remoteness and tranquility is not lost and wherever possible enhanced and c): pattern and diversity of the landscape is protected and enhanced.

Policy 14 of LDP2 seeks the conservation of the Pembrokeshire Coast National Park with criteria 'a' and 'b' resisting development that would cause significant visual intrusion and/or that would be insensitively and unsympathetically sited within the landscape. Criteria 'c' and 'd' resists development that would fail to harmonise with, or enhance, the landform and landscape character of the National Park, and/or fail to incorporate important traditional features.

Policy 29 of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness (criterion 'a'). Policy 30 of LDP2 seeks to avoid development that is of an incompatible scale with its surroundings (criterion 'b') or is visually intrusive (criterion 'd').

The application site lies within Landscape Character Area 1 (Saundersfoot Settled Coast) as defined by the Landscape Character Assessment (LCA) and Seascape Character Area 40 (Carmarthen Bay West) as defined by the Seascape Character Assessment (SCA) Supplementary Planning Guidance (SPG). The area's relevant special qualities and key characteristics are listed as:

- Although substantially settled, the area contains some attractive farmland and woodland patches which intersperse the smaller settlements and farmsteads.
- Inland, the country estate landscape and parkland character around Hean Castle and Coppet Hall is very attractive and locally distinctive.
- Hill and valley hinterland of mixed farmland and mixed mature woodland running to the coast interspersed with coastal settlements and caravan parks which are noticeable and detractive in parts.
- A popular area for tourism due to accessibility of beaches to vehicular traffic focused on Saundersfoot, Amroth and Wiseman's Bridge.

The current proposal is not considered to create any adverse impact to these special qualities and key characteristics in this instance and will not detract from these sensitivities.

Therefore, it is considered that the scheme can be supported in terms of its impact on the visual amenity and special qualities of the National Park.

Policy 29 of the LDP2 requires all development proposals to demonstrate an integrated approach to design and construction and to be well designed in terms of place and local distinctiveness (criterion 'a').

The proposal was initially submitted at pre-application stage and officers have worked with the agent and applicant to undertake several design and layout changes to make the proposal more acceptable in planning terms. The current proposed scheme is considered to provide an overall improvement to the appearance within this semi urban location. The proposed siting of the works within this location are also considered acceptable as the proposal has a scale, form, mass and design which is considered to be in-keeping within this area of Saundersfoot.

The concerns raised of over development, layout, and density, ribbon development are not shared by officers given that the site is an allocated site and officers have worked with the development team throughout the planning process to ensure that the overall design and prominent frontages are respectful to the site and its sensitive surroundings.

A concern regarding inappropriate materials was also raised during the consultation. Officers identified the initial proposed use of facing brick within the proposals as a concern. Following discussions with the applicant and development team this particular material has been omitted from the development as it was considered to not be a material that is commonly used within Saundersfoot. The current scheme now incorporates render and stone finishes to the walls of the dwellings and low boundary walls which is considered to more appropriately reflect the existing character and appearance of the area and is supported by officers.

Following amendments submitted as part of the application process, it is considered that the proposal will provide new residential accommodation which incorporates sustainable design principles and is therefore considered to be in accordance with LDP2 Policy 29.

Amenity and Privacy:

Correspondence has been received which raises concerns of overlooking to existing neighbours, overshadowing and noise disturbance.

Policy 30 of the LDP2 refers to 'amenity' in general seeking to avoid incompatible development and significant adverse impact upon the amenity enjoyed by neighbouring properties particularly where the development is an inappropriate use, is of a scale incompatible with its surroundings, leads to an increase in traffic, noise, odour or light, or is visually intrusive.

The application site is surrounded by residential properties to the east and north east, a caravan site is also located to the south and separated from the development site by existing soft landscaped boundaries. Agricultural fields surround the remaining site to the west and south east.

A Construction Transport Management Plan is to be conditioned as detailed within the report below and this should address any excessive noise concerns raised. Conditions can be imposed to specify the hours during which a new development may be constructed, although in some cases such conditions may not be supported based on the fact that other legislation, such as the Control of Pollution Act, is available should problems occur. If a construction management plan is able to agree the conditions, and subject to PCC's environmental health officers approval, this should be sufficient to ameliorate concerns over construction noise.

The concerns raised regarding overlooking and overshadowing have been addressed in the amended scheme as the 3-storey apartment block has been moved away from the eastern boundary and further into the site thus reducing the impact.

Given the nature of the current proposal, its location and the additional measures detailed above, it is considered that the privacy and amenity of any nearby neighbours will be protected during the construction phase in this instance.

Transportation:

Policy 29 (Sustainable Design) requires proposals to be well designed in terms of Accessibility. Policy 59 (Sustainable Transport) is consistent with these objectives, seeking to permit development which promotes sustainable travel choices and reduces the need to travel by car by ensuring new development is well designed and provides appropriate access for pedestrians, cyclists, vehicles and public transport where appropriate and not permitting proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated. Policy 60 (Impacts of Traffic) prevents development where appropriate access cannot be achieved; where traffic would generate an unacceptable adverse effect in terms of congestion, times of generation or where there is an unacceptable adverse effect on road safety

Correspondence has been received which raises concerns on the following matters:

- Highway safety
- Traffic generation
- Development needs to support pedestrian links within Saundersfoot area
- Lack of public transport
- Parking provision on site lacking
- Displacement of parking spaces on adjacent residential units
- Pressure on local parking

The County Highway Authority (CHA) has indicated that the proposed development is accessed directly from Sandy Hill Road (C3076) which has no streetlights in this area and footways present on the east side, approximately 115m to the north. Speed is variable within the immediate vicinity of the site, changing from 40mph to 30mph, heading northwards. Sandy Hill Road provides a direct connection between

the western edge of Saundersfoot, the marina and main village retail area and the A478. Sandy Hill is utilised as key link for both residents and tourists visiting the area. A bus stop is located approximately 200m to the north of the proposed access and the site is adjacent to the National Cycle Network Route 4.

It is noted that the C3076 is narrow in places and currently benefits from several passing places within the road. An early scheme included two access points off this road into the development and for various reasons this has now been amended to one main access point. This will result in one of the passing places being retained within the Sandhill Road and is welcomed.

Visibility from the access points is adequate with a 30mph speed limit and there have been no accidents within the immediate vicinity of the proposed access arrangements. Any hedgerows indicated within the visibility splay will be required to be maintained at a height of no more than 0.6m.

The site is located approximately 200m from the closest bus stop, which provides services into Saundersfoot, Kilgetty, Tenby and Pendine. The bus stop consists of an unsheltered pole with no passenger amenities at the location on Sandy Hill Road. There are likely to be a number of future residents of the site utilising the bus to access onwards destinations.

The TA indicates that there are likely to be 25 two way AM pedestrian movements in the peak hour. As such, it has been discussed that the development will need to assist in providing a more robust bus stop at this, or nearby suitable, location which includes a formal bus stop with raised kerbs, shelters and road markings. As such, improvements to the bus stops serving Sandy Hill Road are recommended, and a scheme for these works will be covered through a planning condition.

In addition to the above requirements, planning conditions will also cover a shared user path within the site, speed reduction along a section of the C3076 road and a Construction Traffic Management Plan (CTMP).

The CHA has requested that a £2000 per unit S106 financial obligation is applied in order to contribute to the Saundersfoot Sandy Hill Shared Use Path active travel link. The S106 contribution would be applied to the private market housing, only, at a total cost of £94,000 (47 units x £2,000) (ninety four thousand pounds). The acceptable mechanism of securing this contribution is via a S106 Agreement towards a planning contribution. The active travel link forms part of the wider active travel route through Saundersfoot, linking the proposed development at Sandy Hill with the village centre and the Saundersfoot Rail Station. Active travel links provide residents with the opportunity to use active and sustainable travel infrastructure and encourage modal shift away from private vehicles.

The concerns raised on highway safety, traffic generation, displacement of parking spaces on adjacent residential units pedestrian links within Saundersfoot area, pressure on local parking, lack of public transport, parking provision on site lacking are addressed by the amended proposal and conditions imposed on any consent granted.

The access manager has confirmed that no public rights of way will be impacted from the proposed development.

Subject to the planning conditions identified as necessary and the provision of an appropriate planning obligation in relation to transport, the proposal is considered acceptable and to meet the relevant local planning policy requirements with regards to transportation.

Landscaping:

Correspondence has been received that raises concerns regarding the removal of hedgerow and trees.

The information provided within the application submission provides the relevant information to consider the proposed development in regard to the existing and retained trees and landscape features. Conditions are proposed to cover Arboricultural Supervision ensuring that the development is implemented in adherence to the Arboricultural advice, through assessment of the tree protection measures throughout the development – to ensure that the development is carried out in accordance with the duty to maintain biodiversity. In addition a landscape condition is also proposed to ensure the development is implemented in adherence to the landscaping advice.

It is noted that the development has also been amended to remove a second access point off the adjacent C3076 road thus reducing the amount of the existing hedgerow at front the site to be removed. The proposed scheme also includes new extensive landscaping in the form of new trees and other soft landscaping features to compliment the site.

Therefore, whilst concerns have been raised in respect of the removal of hedgerow and trees, these can be addressed through conditions as suggested by the Tree and Landscape Officer.

Biodiversity:

PPW, TAN5 and LDP Policy 11 requires biodiversity considerations to be taken into account in determining individual applications. The presence of a species protected under UK or European legislation is a material consideration when dealing with applications that are likely to result in disturbance or harm to the species or its habitat.

In order to comply with Planning Policy Wales (2024) and the Environment (Wales) Act 2016, planning authorities are expected to ensure every development positively contributes to biodiversity. Indeed, Planning Policy Wales 12 states that all development must result in a net benefit for biodiversity.

Concerns have been raised on the proposed development having an impact on biodiversity.

Natural Resources Wales have concerns with the application as originally submitted and have indicated that these concerns can be addressed through planning conditions relating to adherence to the submitted Construction Environmental Management Plan (CEMP) together with the submitted ecological documentation and relevant drawings.

However, the scheme has been amended to try and mitigate these concerns and a planning consultation response on the amended scheme remains outstanding. Therefore, a further verbal report will be presented to committee at the meeting to update Members on NRW's position.

In addition, a Landscape and Environmental Management Plan (LEMP) will need to be submitted and approved in writing to address the management and maintenance of the landscape and ecological features at the site for a period of no less than 25 years.

The Authority's Ecologist has been involved throughout the planning process and has had significant input to the current amended proposal. She has identified a number of conditions that should be applied to any permission including conditions to ensure delivery of a full biodiversity enhancement scheme. Subject to these conditions is satisfied that the proposal is acceptable in terms of any potential impacts on biodiversity.

The application site is approximately 1km from the Carmarthen Bay and Estuaries Special Area of Conservation (SAC). As a competent authority under the Habitats Regulations PCNPA have to consider the impacts of development on the features for which the European site is designated and where necessary undertake a Test of Likely Significant Effect (TLSE). However it is considered that this development proposal will not likely impact on the SAC features and the PCNPA Ecologist has advised that a full TLSE is not required in this case.

Officers consider that the concerns raised on the proposal having an impact on biodiversity will be fully addressed by the response from NRW and the Authority's Ecologist.

Land Stability:

The Coal Authority has indicated that the proposed development lies within an area that has been defined by the Coal Authority as containing potential hazards arising from former coal mining activity at the surface or shallow depth. However, upon review of the details submitted it is recognised that the area where the built development is proposed is not within the defined High-Risk Area and therefore the Coal Authority has no objection to the current planning application.

Notwithstanding the above, and in the interests of public safety the Coal Authority recommends that, should planning permission be granted for this proposal, an Informative Note be added to the Decision Notice to warn the developer of the potential risks.

Land Drainage:

Correspondence has been received which raises concerns with the risk of flooding on nearby residents, surface water drainage, foul water discharge and capacity of local treatment works.

Dwr Cymru Welsh Water has confirmed that there is sufficient capacity within the local waste water treatment works to accommodate this development. They also request that a condition be added to ensure the scheme is completed in accordance with the approved details and to avoid surface water and/or land drainage being allowed to connect directly or indirectly with the public sewerage system.

PCC Drainage Engineers consider that there is an ordinary watercourse within 20 metres of the development site and therefore the applicant should be made aware of the requirements around this watercourse and an informative will be added to any consent to cover this aspect. Given the size of the development they also consider that the proposal will require SAB approval under separate legislation.

The development scheme includes a surface water attenuation basin along the southern boundary of the site which is also the lowest part of the site, and this will all be subject to formal SAB approval. Thus surface water will be dealt with on the site and discharged at an acceptable rate to the local watercourse, therefore preventing the possibility of flooding to nearby residential properties.

As such, the concerns raised in respect of risk of flooding on nearby residents, surface water drainage, foul water discharge and capacity of local treatment works are not shared by officers based on the above information.

Subject to the imposition of an appropriate condition with regards to surface water, the proposed scheme is considered acceptable in terms of local and national policy in relation to surface water and flooding.

Other Matters:

Correspondence has been received which raises concerns that the development will not have sufficient waste collections.

The application site will be served by Pembrokeshire County Council waste collections as most other residential properties within Pembrokeshire are.

Conclusion

Following consideration of the policies contained within the statutory Development Plan (Future Wales and Local Development Plan 2) and National Planning Policy in the form of Planning Policy Wales (Edition 12) and having regard to all material considerations it is considered that the development will be in accord with the Development Plan and the development is considered to provide a development which is acceptable in principle and can be supported by officers subject to receipt of a Section 106 legal agreement addressing matters of affordable housing, open

space provision and maintenance via a Management Company and a Transportation contribution towards the Active Travel Route.

Recommendation

A further verbal report will be given to Members at the meeting on the outstanding consultation responses from NRW and Ecology. Subject to these matters being suitably resolved officers would offer the following recommendation.

For the application be delegated to the Chief Executive, Director of Planning or to the Development Management Manager to issue consent subject to receipt of a Section 106 legal agreement addressing the provision of Affordable Housing, Open Space and financial contribution towards the Active Travel Route and subject to the conditions listed below.

If the Section 106 legal agreement is not completed within 3 months of the date of the Committee resolution, then delegated power be given to the Chief Executive, Director of Planning or to the Development Management Manager to exercise discretion to Refuse the application on the grounds of non-compliance with Policy 48 (Affordable Housing) and Policy 55 (Infrastructure Requirements) of the Local Development Plan 2.

Conditions

1. The development shall begin no later than five years from the date of this decision.
Reason: Required to be imposed pursuant to Section 91 (1) of the Town and Country Planning Act 1990 (as amended).
2. The development shall be carried out in accordance with the following approved plans and documents:
 - Site Layout Drawing - Sandy Hill - PL03 Rev E (Persimmon Homes) (Received 13.06.2024)
 - Engineering Plan - 10304-100-L (Phoenix Design) (Received 16.02.2024)
 - Alnmouth (Mid) - Proposed Render Elevation - R001 - Al_Mid_R25 – R001 (Received 16.02.2024)
 - Alnmouth (Mid) – Proposed Plans - Al_Mid_R25 – 901 (Received 16.02.2024)
 - Alnmouth (End) - Proposed Render Elevation - R001 - Al_End_R25 – R001 (Received 16.02.2024)
 - Alnmouth (End) – Proposed Plans - Al_End_R25 – 901 (Received 16.02.2024)
 - Danbury (Mid) - Proposed Render Elevation - R001 - Da_Mid_R25– R001 (Received 16.02.2024)
 - Danbury (Mid) – Proposed Plans - Da_Mid_R25 – 901 (Received 16.02.2024)
 - Danbury (End) - Proposed Render Elevation - R001 - Da_End_R25– R001 (Received 16.02.2024)

- Danbury (End) - Proposed Plans - Da_End_R25 – 901 (Received 16.02.2024)
- Chiltern - Proposed Render Elevation - R001 - Ct_End_R25– R001 (Received 16.02.2024)
- Chiltern – Proposed Plans - R001 - Ct_End_R25– 901 (Received 16.02.2024)
- Galloway - Proposed Render Elevation - R001 - Ga_End_R25– R001 (Received 16.02.2024)
- Galloway – Proposed Plans - Ga_End_R25-901 (Received 16.02.2024)
- Kingley - Proposed Render Elevation - R001 - Kg_End_R25-R001 (Received 16.02.2024)
- Kingley – Proposed Plans - Kg_End_R25 -901 (Received 16.02.2024)
- Sherwood - Proposed Render Elevation - R001 – Sh_Det_R25-R001 (Received 16.02.2024)
- Sherwood- Proposed Plans – SH_Det_R25 -901 (Received 16.02.2024)
- Charnwood - Proposed Render Elevation - R001 – Ch_Det_R25-R001 (Received 16.02.2024)
- Charnwood - Proposed Plans – Ch_Det_R25 -901 (Received 16.02.2024)
- Barnwood - Proposed Render Elevation - R001 – Bw_Det_R25-R001 (Received 16.02.2024)
- Barnwood - Proposed Plans – Bw_Det_R25 -901 (Received 16.02.2024)
- Rivington - Proposed Render Elevation - R001 – Ri_Det_R25-R001 (Received 16.02.2024)
- Rivington - Proposed Plans – Ri_Det_R25 -901 (Received 16.02.2024)
- Lambridge - Proposed Stone Elevation - S001 - LB_Det_R25- S001 (Received 16.02.2024)
- Lambridge – Proposed Plans - LB_Det_R25 - 901 (Received 16.02.2024)
- Kielder - Proposed Render Elevation - R001 – Kt_Det_R25-R001 (Received 16.02.2024)
- Kielder - Proposed Plans – Kt_Det_R25 -901 (Received 16.02.2024)
- Cranbourne – Proposed Cranbourne Block- Apt_MA_Cb_R20 - 902 (Received 16.02.2024)
- Cranbourne - Proposed Elevation – Render - Apt_MA_Cb_R20-R002 (Received 16.02.2024)
- Apartment Stair Core - Plans - Apt_MA_Stair1_R21-901 (Received 16.02.2024)
- Apartment Stair Core - Elevation - Apt_MA_Stair1_R2 -R001 (Received 16.02.2024)
- Saunton – proposed plans - Sa_End_R25-901 (Received 16.02.2024)
- Saunton- Proposed Render Elevation - R001 - Sa_End_R25 (Received 16.02.2024)
- Braunton – Proposed Plans - Br_Mid_R25 (Received 16.02.2024)

- Braunton - Proposed Render Elevation - R001 - Br_Mid_R25 (Received 16.02.2024)
- Single Garage - Proposed Plans & Eles - Side Gable - Ga1.1_MA_R21-R001 (Received 16.02.2024)
- Twin Garage - Proposed Plans & Elevations - Ga2.2_MA_R21- R001 (Received 16.02.2024)
- External boundary details - EBD01 (Received 16.02.2024)
- Transport Statement – ref. B T22.102.TS. (Asbri Transport) (Received 16.02.2024)
- Green Infrastructure Statement – ref. B TDA (Received 28.03.2024)
- Ecological Impact Statement – ref. HE/45/2020 – Issue 12 (Hawkeswood Ecology) (Received 13.06.2024)
- Phase 1 Habitat Survey - ref. HE/45/2020 – Issue 1 (Hawkeswood Ecology) (Received 16.04.2024)
- Reptile Presence/Absence Survey – HE/45/2020 reptiles Issue 2 (Hawkeswood Ecology) (Received 16.04.2024)
- Bat Activity Surveys – ref. HE/45/2020 bat activity Issue 3 (Hawkeswood Ecology) (Received 16.04.2024)
- Dormouse Survey – HE/45/2020 dormouse. Issue 7 (Hawkeswood Ecology) (Received 13.06.2024)
- Dormouse Conservation Plan Issue 6 (Hawkeswood Ecology) (Received 13.06.2024)
- Basin Section – 10304-105-B (Phoenix Design) (Received 15.08.2023)
- Detailed Soft Landscape Proposals – ref. TDA.2670.02 (M) (TDA) (Received 13.06.2024)
- Landscape Design Statement, Specification & Management Plan (TDA) (Received 24.10.2022)
- Planting Plan – PP01 (Persimmon Homes) (Received 15.08.2023)
- Pre-Development Tree Survey & Assessment – ref. TDA/2670/TS&A/RhC/02.22. (TDA) (Received 24.10.2022)
- Arboricultural Method Statement – ref. A TDA/2670/AMS/AMO/04.23 (TDA) (Received 15.08.2023)
- Tree Constraints Plan – ref. TDA/2670/TCP/RhC/02.22 (TDA) (Received 24.10.2022)
- Topographic Survey – ref. P3360A_2D (Healer Surveys) (Received 16.04.2024)
- Construction Environmental Management Plan V3 (CEMP) (Received 30.04.2024)

Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

3. No building shall be occupied until the drainage system for the site has been completed in accordance with the approved details. Thereafter no further surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment. Policy: Local Development Plan 2 – Policy 29 (Sustainable Design).

4. No development, including site clearance, shall commence until a Landscape and Ecological Management Plan (LEMP) for the provision, management and maintenance of the landscape and ecological features at the site of a period no less than 25 years has been submitted to and approved by the Local Planning Authority. include, but not necessarily be limited to:
- details of habitats and ecological features present or to be created, both in written form and shown on appropriate drawings, including planting plans
 - defined aims and objectives (including defined key performance indicators for long term monitoring)
 - details of the desired condition for each habitat and criteria to determine when habitats have achieved this
 - details of short and long-term habitat management prescriptions to both achieve and maintain the desired condition
 - details of monitoring methodologies for of habitat(s) and species
 - details of scheduling and timings of activities
 - persons or bodies responsible for undertaking management and surveillance together with required skills and competencies
 - licensing requirements [for management surveillance and other defined activities]
 - details of reporting, review and update of the plan (informed by monitoring) at specific intervals as agreed.

Reason: In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation, and enhancement of links between sites and their protection for amenity, landscape, and biodiversity value. Policy: Local Development Plan 2 – Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 30 (Amenity), Technical Advice Notes - (TAN) 5: Nature Conservation and Planning (2009) and (TAN) 10: Tree Preservation Orders (1997).

5. Prior to commencement of the proposed development, in agreement with the Local Planning Authority and County Highway Authority for the provision of a Shared Use Path and agreed routing, linking the full length of proposed development to Sandy Hill Park, shall be designed and submitted to the satisfaction of the Local Planning Authority for approval in writing. Such scheme as is agreed shall be implemented and completed prior to the occupation of any dwellings.

Reason: In the interests of public amenity and pedestrians. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

6. Prior to 80% of the residential units being occupied, works to improve the nearby bus stop (which shall include bus shelter, lining, signing and kerbing)

located Sandy Hill Lane, shall be carried out in accordance with a scheme to be submitted for the approval of the Local Planning Authority.

Reason: In the interests of public amenity and pedestrians. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

7. Prior to commencement of the proposed development, the Applicant shall provide written details and drawings and fully fund the extension of speed limit scheme via the Traffic Regulation Order process for the approval of the Local Planning Authority. The Applicant shall liaise with the Traffic Management Team at Pembrokeshire County Council in order to develop an appropriate scheme.

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

8. Prior to the commencement of the proposed development, the Applicant shall supply further design and construction details of the proposed access to Sandy Hill Road, including visibility zones, on plans to be submitted to, and agreed by the Local Planning Authority, in writing and thereafter the agreed visibility zones shall be kept permanently clear of any obstruction measured 0.6m above the road surface.

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

9. The proposed development shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles to be parked and for the loading/unloading of vehicles and for vehicles to turn so that they may enter/leave the site in forward gear. Thereafter the parking/loading and unloading/turning areas shall be retained and maintained for their designated purpose.

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

10. No development shall take place until a Construction Traffic Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. This shall include further information on the following:

- a) Parking for vehicles, site personnel, operatives, and visitors
- b) Expected levels of staff and any shift work, by phase
- c) Expected trip generation for the construction period
- d) Loading and unloading of plant and materials
- e) Storage of plant and materials
- f) Vehicle routing
- g) Measures to prevent the deposit of materials on the highway
- h) Before and after construction conditions surveys of the highway and a commitment to fund the repair of any damage caused
- i) On-site turning for construction vehicles

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

11. The proposed development shall be completed in full adherence to the Arboricultural details submitted to the LPA:

- TDA Green Infrastructure Statement Rev A – March 2024
- TDA.2670.02 (J) – Detailed Soft Landscape Proposals - April 2024
- TDA.2670.04(A) Tree Protection Drawing – Updated August 2023
- TDA/2670/AMS/AMP/04.23 (AMS) - Updated August 2023
- TDA/2670/TS&A/RhC/02.22 – February 2022
- TDA/2670/TCP/RhC/02.22 – February 2022

Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been agreed in writing by the LPA. Upon completion of the development, the Local Planning Authority will be provided with clear and obvious proof that the details of the Arboricultural Method Statement have been adhered to, including the Arboricultural Supervision schedule. Proof will be demonstrated through the submission of a report, which summarise the details of Arboricultural Consultant visit, including where relevant photographic evidence of adherence to the Arboricultural Method Statement and Tree Protection Plan.

Reason: To prevent detrimental impact to trees, hedges and other landscape features which contribute to the amenity, landscape & biodiversity of the site and surrounding area. Local Development Plan 2 – Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 30 (Amenity), SPG 12 – Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009) and Technical Advice Note (TAN) 10: Tree Preservation Orders (1997).

12. The landscaping works shall be carried out in accordance with:

- TDA Landscape Design Statement, Specification & Management Plan - March 2022
- TDA.2670.02 (J) – Detailed Soft Landscape Proposals - April 2024
- TDA Green Infrastructure Statement Rev A – March 2024

The completed scheme shall be managed and maintained in accordance with an approved scheme of management and maintenance in the documents listed.

13. Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been agreed in writing by the LPA.

Reason: To prevent detrimental impact to trees, hedges and other landscape features which contribute to the amenity, landscape & biodiversity of the site and surrounding area. Local Development Plan 2 – Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 30 (Amenity), SPG 12 – Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009) and Technical Advice Note (TAN) 10: Tree Preservation Orders (1997).

14. Prior to any earth movement on site, a temporary heras fence must be installed along all hedgerows/tree lines to be retained (along with any buffer proposed in the final landscaping scheme). These must remain in place until all earth works have been completed.
Reason: To comply with the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 and the Environment (Wales) Act 2016 and Policies 9 and 11 of the Pembrokeshire Coast National Park Local Development Plan
15. Native infill planting must be planted as soon as possible in the first planting season following commencement of development.
Reason: To comply with the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 and the Environment (Wales) Act 2016 and Policies 9 and 11 of the Pembrokeshire Coast National Park Local Development Plan
16. Prior to the commencement of works, a Landscape Ecological Management Plan (LEMP) for the provision, management and maintenance of the landscape and ecological features at the site of a period no less than 25 years must be submitted to and approved by the LPA in consultation with NRW.
Reason: To comply with the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 and the Environment (Wales) Act 2016 and Policies 9 and 11 of the Pembrokeshire Coast National Park Local Development Plan.
17. Prior to the commencement of any development or site clearance a sensitive clearance strategy for reptiles must be prepared by a competent ecologist and submitted in writing to, and approved by the LPA. The development thereafter must be carried out in accordance with the approved details.
Reason: To comply with the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 and the Environment (Wales) Act 2016 and Policies 9 and 11 of the Pembrokeshire Coast National Park Local Development Plan
18. Prior to the commencement of works, a full biodiversity enhancement scheme must be submitted to and approved by the LPA. Such scheme as is agreed shall be implemented/delivered prior to occupation of any dwelling.
Reason: To comply with the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 and the Environment (Wales) Act 2016 and Policies 9 and 11 of the Pembrokeshire Coast National Park Local Development Plan

Informatives

The applicants attention is drawn to the attached consultation response from Wales & West Utilities.

The applicant's attention is drawn to the attached consultation response from Dwr Cymru Welsh Water.

The applicant's attention is drawn to the attached consultation response from PCC Transportation and Environment Section consultation response.

The applicant's attention is drawn to the attached consultation response from Pembrokeshire County Council Drainage Engineers.

The proposed development lies within an area that has been defined by The Coal Authority as containing potential hazards arising from former coal mining activity. These hazards can include: mine entries (shafts and adits); shallow coal workings; geological features (fissures and break lines); mine gas and previous surface mining sites. Although such hazards are seldom readily visible, they can often be present and problems can occur in the future, particularly as a result of development taking place.

It is recommended that information outlining how the former mining activities affect the proposed development, along with any mitigation measures required (for example the need for gas protection measures within the foundations), be submitted alongside any subsequent application for Building Regulations approval (if relevant). Your attention is drawn to the Coal Authority policy in relation to new development and mine entries available at www.coal.decc.gov.uk.

Any intrusive activities which disturb or enter any coal seams, coal mine workings or coal mine entries (shafts and adits) requires the prior written permission of The Coal Authority. Such activities could include site investigation boreholes, digging of foundations, piling activities, other ground works and any subsequent treatment of coal mine workings and coal mine entries for ground stability purposes. Failure to obtain Coal Authority permission for such activities is trespass, with the potential for court action.

Property specific summary information on past, current and future coal mining activity can be obtained from The Coal Authority's Property Search Service on 0845 762 6848 or at www.groundstability.com.

If any of the coal mining features are unexpectedly encountered during development, this should be reported immediately to The Coal Authority on 0845 762 6848. Further information is available on The Coal Authority website www.coal.decc.gov.uk.

The permission hereby granted shall not be construed as authority to carry out works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit, and potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge, or other land forming part of the highway. All works on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991.

The developer is advised that as part of the detailed design of the highway works required by the above conditions, the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and other street furniture/equipment.

The developer is reminded it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning, or repairing highway surfaces and prosecute persistent offenders. (Highways Act 1980, Sections 131, 148 and 149).

The crossing of the Highway verge/footway requires further consent from the Highway Authority under Section 184 of the Highways Act 1980, and working in the Highway must be done by an approved contractor. The attached letter produced by the Highways Authority includes the application form, contractors list and explanatory notes.

It is the responsibility of the Authority to provide the naming and numbering of all roads and new developments and to facilitate in the provision of service connections. To ensure suitable and accurate addressing is provided, contact the Street Naming & Numbering Officer on 01437 775224 at the earliest opportunity should this application be approved.

Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The highway Authority will pass on the cost of any excess repairs compared to the normal maintenance costs to the applicant/organisation responsible for the damage.

Appendix 1: Analysis of need for primary dwelling only condition

The Town and Country Planning (General Permitted Development etc.) (Amendment) (Wales) Order 2022) No.994 (W.211) and No.997 (W.213) Changes to Planning Policy Wales (PPW) section 4.2 Housing regarding: affordability and the impact of second homes and short term lets.

Two new Statutory Instruments were introduced in October 2022 which create new use classes C5 and C6.

The three uses now included are:

- Use class C3 (dwelling houses; used as sole or main residences occupied for more than 183 days in a calendar year).
- Use class C5 (Dwelling houses; used otherwise than as sole or main residences covering a dwellinghouse other than as a sole or main residence and occupied for 183 days or fewer in a calendar year i.e., second homes)
- Use class C6 (Short-term lets, covers the use of a dwellinghouse for commercial short-term letting not longer than 31 days for each period of occupation).

Simultaneously Welsh Government amended the Town and Country Planning (General Permitted Development) Order 1995 to allow permitted changes between the new use classes - C3, C5 and C6 or a mixture of those uses. These permitted changes can be withdrawn by way of a direction made under article 4 of the 1995 Order.

The Welsh Government also amended Planning Policy Wales to reflect the legislative changes. These policy changes make it explicit that, where relevant, the prevalence of second homes and short-term lets in a local area must be taken into account when considering housing requirements and policy approaches in Local Development Plans.

The permitted changes between the C3, C5 and C6 use classes, or a mix thereof, in the 1995 Order may also be removed by the Authority by way of planning conditions to restrict the use of a development to one particular use class within the Order, effectively preventing the ability to move between uses without planning permission.

Planning conditions are subject to a number of tests established in the Welsh Government circular WGC016/2014 'The Use of Planning Conditions for Development Management'¹ so any condition imposed would need to meet the tests, that conditions must be: (i) necessary; (ii) relevant to planning; (iii) relevant to the development to be permitted; (iv) enforceable; (v) precise; and (vi) reasonable in all other respects.

¹ [Microsoft Word - Planning Conditions Circular - The Use of Planning Conditions for Development Management - Publication version without front cover 20141006.docx \(gov.wales\)](#)

Officers have considered the appropriateness of applying conditions to control occupancy given the amendments to the Use Classes Order 1987 which provides for the three use classes.

The relevant policies from the Local Development Plan that apply are:

Policy 46 Housing (Strategy Policy): When the Pembrokeshire Coast National Park Local Development Plan 2 was prepared it included a housing requirement figure which incorporated an allowance for second homes and holiday homes known as a 'vacancy rate'. Dwelling growth associated with the projected household growth is calculated using a dwelling 'vacancy rate' which takes account of the number of vacant or second properties in the National Park. Pembrokeshire Coast National Park has a high vacancy rate due to the number of second/holiday homes in the area. The total housing requirement figure for the whole of the National Park area assumed that of those properties built during the LDP 2 period (until 2031) 26.7% of these would be used as either second homes or holiday homes. This figure was derived from census information on percentages in different communities at the base date of the evidence base for the Local Development Plan, so it was not a uniform figure for the whole area of the National Park. 26.7% is an average across the whole of the National Park.

A greater prevalence for second homes and short-term lets than anticipated in a specific location would be an issue for implementing the Local Development Plan's housing requirement under Policy 46 Housing (Strategy Policy) of the Local Development Plan as it could undermine anticipated delivery of (in particular) primary residences. Conversely, a lesser prevalence for second homes and holiday homes than anticipated would mean that the Local Development Plan's housing requirements under Policy 46 Housing (Strategy Policy) of the Local Development Plan were capable of being delivered and that holiday homes and second homes were less of an issue. This analysis, it is considered, could provide a rationale for justifying a need to impose a planning condition to restrict permitted changes between the new use classes on a case-by-case basis where a greater prevalence of second homes and holiday let than anticipated in the Local Development Plan's strategy is considered likely.

Policy 40 Self-catering Development: Local Development Plan 2 also includes Policy 40 Self-catering Development which only permits self-catering development in specific locations (in a brownfield location in a Centre or in a conversion in a countryside location) but only in those instances where the site or building is inappropriate for market or affordable housing provision. Policy 40 is considered to provide strong justification for the imposition of a condition limiting use to C3 (Dwellinghouses) and restricting permitted development rights to move to C5 (Second Homes) or C6 (Short-term lets) uses.

However, given that a vacancy rate allowance, as set out above under the Policy 46 Housing commentary, is already factored into the housing provision figures of the Local Development Plan 2 the Authority will be required to consider the prevalence of second homes and holiday lets in a locality in coming to such a decision as to the necessity of imposing a condition.

Policy 47 Housing Allocations or Land with Permission & Policy 48 Affordable Housing: Both these policies are supported by assumptions made to determine the viability of housing development to deliver the Authority's affordable housing targets. The viability was based on open market housing prices. If occupancy controls were imposed on housing then this can impact on viability. Although there is not yet specific evidence on the impact of restrictions in use in the National Park, evidence regarding the specific viability impact of the imposition of a primary residence control is emerging in locations such as Cornwall, Dorset², the Scilly Isles³ and Exmoor National Park^{4 5}.

The documents referred to above advise that placing additional restrictions on new homes to exclude use to principal residences may affect the market value of properties built as it limits the number of buyers by excluding all prospective second home and short-term letting owners.

The rule of thumb used is that 95% of open market value would be appropriate when a condition restricting second home or holiday letting is used.

Any reduction in a development's viability would be likely to have negative implications for the Authority's affordable housing numbers which is a key strategic objective of Local Development Plan 2.

Taking each Policy listed above in turn, in light of the new Statutory Instruments and changes to Planning Policy Wales, the planning application's compliance is considered:

The following matters are material:

The application:

- site is an allocated site in the Local Development Plan for 68 dwellings within the Saundersfoot Centre Boundary. It is shown as an allocation site on the Proposals Map – Inset C35. The affordable housing requirement for the site is 35% (24 affordable dwellings are expected). (Policy 47 Housing Allocations or Land with Permission & Policy 48 Affordable Housing)
- The proposal is for 74 dwellings. The layout includes apartments which are designated as affordable housing. The applicant's layout drawing of the 21/01/2022 Revision N refers to 25 affordable dwellings in total being included.

² [9e6c81c7-b186-cad3-b5c9-99dab34d40f7 \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk) – Para 4.3 deals with viability issues.

³ <https://www.scilly.gov.uk/sites/default/files/planning-apps/Housing%20Viability%20Assessment%20Council%20of%20Isles%20of%20Scilly%20-%20Final%20Report%20March%202018.pdf> paragraph 2.12

⁴ https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0027/239715/Inspectors-Report-full.pdf paragraph 79.

⁵ https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0025/222694/CE12-Three-Dragons-and-Rural-Housing-Solutions-2016-ENPA-Whole-Plan-Viability-Studya.pdf Paragraph 4.5

Policy 46 Housing (Strategy Policy): The table below shows vacancy rate attributable to Saundersfoot Council area from the 2011 Census.

Community/City/Town Council Areas:	All household spaces	Household Spaces with no usual resident:	Household Spaces with No usual resident (%)
Saundersfoot	1680	480	28.57%

For Saundersfoot Community Council area the apportioned second and holiday home allowance ('vacancy rate') made is an estimated 28.57% of the provision could be used as second homes or holiday let.

However, analysis of Saundersfoot records for properties within the Saundersfoot Centre Boundary (development boundary delineated in the Pembrokeshire Coast National Park Local Development Plan 2) show that there is a higher prevalence rate of 29.35% of all residential properties in the Saundersfoot Centre Boundary registered as holiday lets and second homes on the Council Tax register. The information is taken from the Local Land and Property Gazetteer (LLPG).⁶

Saundersfoot
Total Properties: 1683
Residential Properties: 1189 (70.65%)
Total Holiday Lets and Second Homes: 494 (29.35%)
Holiday Lets: 217 (12.89%)
Second Homes: 277 (16.46%)

When considering applying a condition it is important to note that the Local Development Plan Housing Requirement specifically included an allowance which assumed that a proportion of properties across the National Park would be occupied as second homes or short-term holiday lets/homes and there is a risk that applying a condition to 100% of the properties would cause displacement to other locations. Therefore, if a condition is imposed the Local Planning Authority may wish to apply the condition in line with the assumed percentage for that settlement. In the case of Saundersfoot as there was an assumption that 28.57% (29% if rounded) of properties would be second homes or holiday homes, this would mean applying a condition to 71% of open market properties. Applying a condition to 71% of properties, rather than 100% of properties also assists with viability and affordable housing provision

Clustering of Second and Holiday Homes:

It should also be considered whether higher prevalence can be also found in the area where the application site is located within the Centre Boundary.

To assess this Officers have undertaken further analysis of the Local Land and Property Gazetteer (LLPG) to highlight where clusters of second homes and holiday lets can be found within the Centre Boundary of Saundersfoot.

⁶ A Local Land and Property Gazetteer (LLPG) is the central corporate database for all addressing used in an authority.

Method used⁷: Using a computer algorithm similar data points are grouped together in a dataset. The assumptions inputted by Officers are to have a minimum of 5 such data points (in this case either second home or holiday let) within 100m of each other. DBSCAN finds the groups of points that are close together. It starts by choosing a point at random and then looks at all the other points within a certain distance of that point. If there are enough points within that distance, DBSCAN will consider those points part of a cluster. Then, it repeats the process for each of the points within the cluster until all the points in the cluster have been identified. DBSCAN also identifies points that are too far away from any cluster to be considered part of a group. These points are called "noise" points, and they're usually not useful for making predictions or analysing the data. Overall, DBSCAN is a useful algorithm for finding patterns in data when you don't know how many clusters there are or how big they are.

As a result of this analysis, it can be shown that holiday lets and second homes are more prevalent in the single cluster identified for Saundersfoot than the vacancy rate assumption for the Community Council area as a whole.

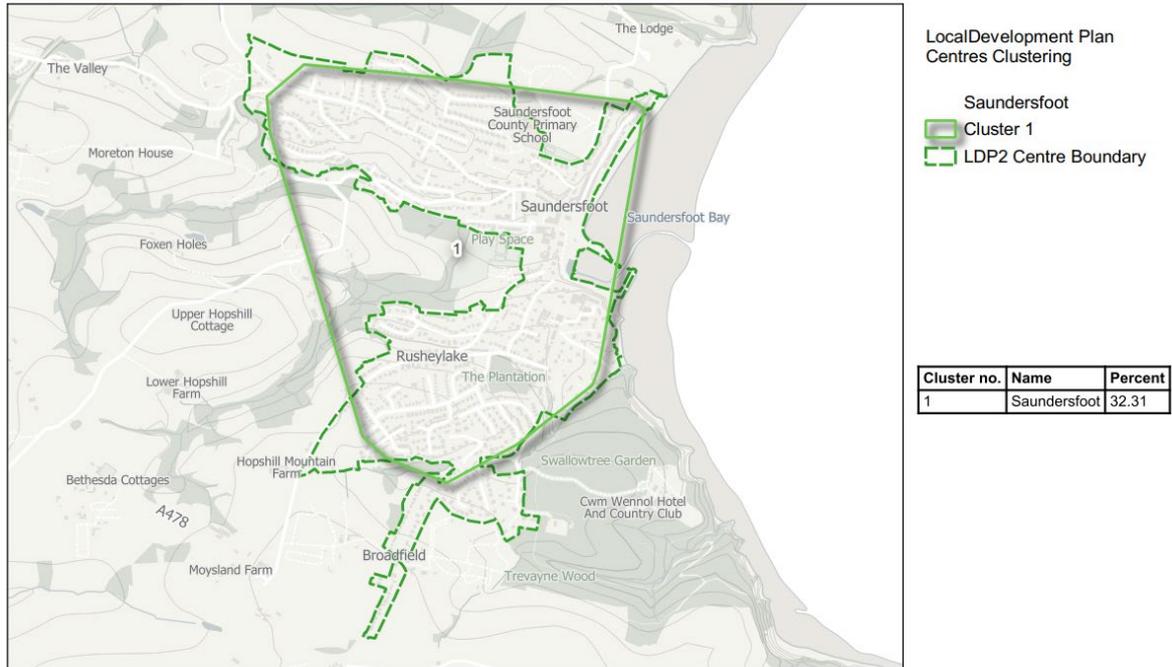
CLUSTER_ID	Second and Holiday homes %
1	31.32%

The application site is a greenfield site lying adjacent to cluster 1.

The map below identifies the location of the cluster which lies adjacent to the application site. Detail has been removed from the mapping to ensure individual properties cannot be identified.

This mapping does not mean that there are no second homes or holiday let properties outside this cluster it simply means that this cluster could be identified because there was a minimum of 5 second homes and/or holiday let located within 100m of another such property in the group.

⁷ DBSCAN stands for Density-Based Spatial Clustering of Applications with Noise



Density Based Spatial Clustering of Second and Holiday Homes

Saundersfoot



The application site lies adjacent to Cluster 1 where 32.31% of residential properties are in use as either a second or holiday home. This shows that when considered at a more local level the prevalence of holiday and second homes is greater than anticipated by Policy 46 Housing (Strategy Policy) for this location.

This means that the Local Planning Authority has evidence that both the Centre and the specific location considered have a slightly greater prevalence of second homes and holiday homes than the allowance made for Saundersfoot. The levels shown, are however, only marginally greater than the 2011 Census figure for the Community Council area and it is difficult to therefore justify considering the application of a C3 occupancy condition to the market properties within the proposal.

Recent Housing Completions on large sites: This section considers how recent housing developments of five or more dwellings that have been developed in Saundersfoot have been occupied. The base date of Local Development Plan 2 (2015) is used as a reference point.

Since the base date of Local Development Plan 2 there is only one large site (5 or more dwellings granted permission) that has had completions recorded. There are an estimated 17% of housing completions in use as either holiday let or second homes. This can be compared with the Community Council figure of 28.57% from the 2011 Census figures. It should be noted that this is a single site, and the figures are calculated from a low number of completions. This can be compared with the Community Council figure of 28.57% from the 2011 Census figures.

The evidence for the Centre and the cluster mapping and the evidence from this one large site where completions have taken place recently are insufficient to justify consideration of imposing a C3 occupancy condition on the proposal.

Similar Types of Proposals: The type of proposal in question, predominantly an estate style development, has also been considered in terms of prevalence of holiday let and second homes in similar developments in Saundersfoot. 16 estate type developments were identified, and the Local Land and Property Gazetteer was again checked for prevalence levels.

The location of the properties in Saundersfoot is not shown for data protection reasons.

Location	Second and Holiday Home (%)			
1	7.14			
2	0			
3	0			
4	7.69			
5	12.5			
6	0			
7	0			
8	12.07			
9	18.75			
10	1.85			
11	20.69	Close to Sandy Hill	21.12	Average Sites 11 to 15
12	11.48	Close to Sandy Hill	20.69	median 11 to 15
13	32.73	Close to Sandy Hill	32.73	High 11 to 15
14	11.76	Close to Sandy Hill	11.48	Low 11 to 15
15	28.95	Close to Sandy Hill		
16	0			
All Sites 1-16	Average		10.35	
	median		9.6	
	Low		0	
	High		32.73	

The analysis of similar types of developments (in this case estate developments) with an average of 10.35 % of residential dwellings being occupied as second homes or short-term letting does not demonstrate that there is justification for applying a C3 occupancy condition to 100% of the dwellings on the application site.

Sites in the vicinity of the application site were also considered and with a prevalence of 21.12% again is not possible to advise that estate developments are likely to show a higher prevalence.

Similar Types of Proposals: The type of proposal in question, also involves flats or apartments.

Comparable properties are reviewed below. The location of the properties in Saundersfoot is not shown for data protection reasons. 6 such developments were identified.

Flatted Developments		
Location Number *		Combined Percentage Second and Holiday Homes
1		100.00
2		68.42
3		83.33
14		100.00
15		88.89
18		6.25
* Not numbered sequentially		
All Sites	Average	74.48
	Median	86.11
	Low	6.25
	High	100.00

The analysis of similar types of developments, (in this case flatted developments), with an average of 74.48% of residential dwellings being occupied as second homes or short-term letting does demonstrate strongly that there is justification in principle for applying a C3 occupancy condition to the residential units on the application site.

It should be noted however that the flatted development on layout numbered 'N' identifies these properties as the affordable housing provision and therefore an occupancy condition would not be required if this were the case. If not affordable housing provision, then 74% of the flatted element of the development should be considered for the imposition of a C3 occupancy condition.

Policy 47 Housing Allocations or Land with Permission & Policy 48 Affordable Housing

Overall Housing Delivery: For Saundersfoot three sites are formally allocated in the Plan for housing development. Table 10, page 129 of the Local Development Plan shows the expected Housing Land Supply for the Plan period (2015 to 2031) for Crymych, Saundersfoot, St Davids and Newport, a combined target.

Centre	Completions 2015 to 2019	Units with Planning Permission	Allocations	Large Windfall	Small windfall
Crymych		0	0		
St Davids		0	70		
Newport		47	10		
Saundersfoot		0	158*		
Total	49	47	238	24	65

*Includes the application site.

The table above shows an anticipated 423 (49+47+238+24+65) dwellings being completed over the Local Development Plan period in these Centres which would be on average of 26 per annum. Eight years of the Plan have elapsed, and 195 residential units have been completed as opposed to an expected 208 residential units. This shows that when considered on an annual basis then completions are behind expectations by 13 residential units. It should also be noted that completions recently in Saundersfoot have been limited. The recent review of Local Development Plan 1 focused in part to find housing allocations that would deliver affordable housing in Saundersfoot. Three sites were included. This site is one of those sites.

Affordable Housing Delivery: For affordable housing delivery a figure of 194 dwellings (estimate 12 per annum over 16 years) is identified for the Plan period for these Centres.

With eight years of the Plan elapsed 84 affordable dwellings have been completed as opposed to an expected 96 units (12x8). The target for the Centres overall is behind. It should also be noted that there have been no affordable housing completions in Saundersfoot during this period. The allocations of the Local Development Plan 2 in Saundersfoot (including this application site) are expected to deliver 57 affordable housing units towards the overall target.

The site is allocated as one of three sites to be important contributors to affordable housing provision in Saundersfoot and to the overall affordable housing target for the main Centres of the National Park.

Conclusion on Occupancy Controls:

Although a slightly higher prevalence is shown at a Centre level and when the clustering exercise is undertaken a review of similar estate type developments and estate type developments in the vicinity of the application site would suggest that with more localised analysis does not justify the imposition of a C3 condition.

The imposition of a C3 condition on the flatted element should only be considered if those properties are no longer identified as delivering affordable housing. At this point the imposition of a C3 condition is not recommended and therefore no further analysis of viability is required.

NP/22/0621/FUL

Land East of Sandy Hill, Saundersfoot,
Pembrokeshire SA69 9DR
Land East of
Sandy Hill, Saundersfoot, Pembrokeshire
SA69 9DR



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:1,250

