
From: Stephen Oates
Sent: 18 July 2017 10:21
To: DevPlans Team shared mailbox
Subject: Local Development Plan 2 - Candidate Sites, Lawrenny
Attachments: 170717 Candidate sites objections Stephen Oates.pdf; 170413 Pre_planning response S Oates.pdf; 170717 S Oates Pre Deposit Questionnaire LDP.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you for giving me the opportunity to comment on your draft LDP2 and the Candidate Sites register.

I attach a completed copy of your questionnaire, supported by:

- A detailed submission setting out my objections and representations about candidate sites 044, 044a, 045 and 046 in Lawrenny
- For your background information, my recent pre-planning consultation submission to the developers of candidate site 045, Home Farm, Lawrenny (current LDP site HA559).

I do hope these comments are helpful but please do not hesitate to contact me if you would like any clarification or further information.

Stephen Oates

OFFICE
USE ONLY

Question 2: Candidate Site Register Comments		YES	NO
Is there anything that you feel we should amend?*		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: (please provide a site reference)	Please see attached paper setting out: i) objections to the inclusion of candidate sites 044 and 044a; ii) request for amendments to the scale and layout of candidate site 045; and iii) request for limitations on the scale of potential development of candidate site 046. As background information, I also attach my response to the recent pre-planning consultation for the proposed housing development at Home Farm, Lawrenny (candidate site 045).		

*Those changing proposals for candidate sites already submitted or those submitting new sites will need to submit a separate Preferred Strategy Site Submission Form and a Sustainability Appraisal Form. The links to these forms and guidance when submitting are available via the main Preferred Strategy consultation page.

Question 3: Sustainability Appraisal Comments – <i>No comments</i>		YES	NO
a) Is there anything that you feel we have included that should be removed? (tick the box)		<input type="checkbox"/>	<input type="checkbox"/>
Comments: (please provide a paragraph reference)	<hr/> <hr/>		
b) Is there anything that you feel we have not included that we should consider?		<input type="checkbox"/>	<input type="checkbox"/>
Comments:	<hr/> <hr/>		
c) Is there anything that you feel we should amend?		<input type="checkbox"/>	<input type="checkbox"/>
Comments: (please provide paragraph reference)	<hr/> <hr/>		

Question 4: Equality Impact Assessment Comments – <i>No comments</i>		YES	NO
(tick the box)			
a) Is there anything that you feel we have included that should be removed?		<input type="checkbox"/>	<input type="checkbox"/>

Comments: (please provide a paragraph reference)	
b) Is there anything that you feel we have not included that we should consider?	<input type="checkbox"/> <input type="checkbox"/>
Comments:	
c) Is there anything that you feel we should amend?	<input type="checkbox"/> <input type="checkbox"/>
Comments: (please provide a paragraph reference)	

About you: Please note that this section must be completed. All comments will be made publicly available and cannot be treated as confidential.

Personal Details			
Name	Stephen Oates	E-mail	
Address		Phone	
		Organisation (if applicable)	N/A
		Post Code	

Agent's Details (if applicable)			
Name		E-mail	
Address		Phone	
		Organisation	
		Post Code	

Thank you for completing this questionnaire.

COMMENTS ON LDP CANDIDATE SITES BY STEPHEN OATES

17 July 2017

Candidate Site 044

This proposal is incompatible with the two statutory purposes of the Authority which are to:

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks; and
- To promote opportunities for the understanding and enjoyment of the special qualities of the Parks by the public.

I object to inclusion of this candidate site and recommend that it be removed from the proposed LDP, for the following reasons:

- This is a prominent greenfield site at the entrance to Lawrenny, lying outside the boundaries of the existing rural centre. Development here will inevitably be visually intrusive and harmful to the essential characteristics of the village.
- Development of this candidate site is not consistent with the proposed rounding off and in-filling policies of LDP2 for rural centres and countryside.
- If both this site and the adjoining candidate site 045 (current LDP site HA559) are developed within the LDP period to 2032, the small village of Lawrenny will be increased by at least 150% from its current size of approximately 40 houses. Recent experience demonstrates that up to 50% of all new houses built in the village are purchased as second homes.
- In effect, the combined proposals are equivalent to developing a new holiday village in a prominent position “within this old village, which lies wholly within the Milford Haven Waterway Registered Landscape of Outstanding Historic Interest in Wales” (ref. Pembrokeshire Coast National Park Settlements Capacity Study Update Candidate Site Assessments Newport and Lawrenny). If implemented, the proposal will inevitably place great strain on the small resident community.
- The proposal is inconsistent with the findings of the Settlements Capacity Study which states: “The small scale of the village – with sense of containment provided by both landform and surrounding woodland, and its elevated position above the river valley results in a moderate to high sensitivity. Capacity for development is limited due to the close proximity of existing buildings within the settlement, sloping landform and well wooded character, and presence of historic features.”
- Your sustainability assessment for this site is misleading in rating the proposal as ‘generally positive’ for minimising the need for travel. Local facilities are very limited with no links to larger local centres on foot, bicycle or by public transport. The small Community Shop has only limited basic provisions, making car travel essential for any new development in the village. Therefore, the travel rating should more accurately be categorised as ‘generally negative’.

- The village sewers and wastewater treatment system, which are privately owned, are inadequate to cope with further development pressure. There will need to be substantial investment and reconstruction of this system if it is to be capable of adoption by Dwr Cymru Welsh Water.
- Access paths, roadways and common areas associated with previous new developments in Lawrenny village have not been publicly maintainable, raising uncertainty about potential future liabilities for associated management charges, over which home owners will not have control. This is incompatible with expectations for affordable housing.
- This large site should not be considered without further assessment as part of an update to your Settlements Capacity Study.

Candidate Site 044A

This site, though smaller than site 044, is a wholly greenfield site outside the envelope of Lawrenny village. In my view, there is no rational basis for promoting housing development on this area of the National Park while there is scope to accommodate affordable housing needs within the adjoining site 045.

The objections to developing site 044 also apply to this smaller site.

The suggestion that a reduced scale of site 044 might be justified as exceptional in-filling/rounding off affordable housing development under proposed policy 45 is not credible as a 'standalone' proposal. The limited facilities and weak infrastructure of Lawrenny village are not suitable for this potential affordable housing development.

A development of this isolated parcel of agricultural land would be dependent for viable services and access on the separate proposals for redevelopment of the adjoining Home Farm site (candidate site 045 and existing LDP site HA559).

If a reduced site is to be considered despite these objections, it should be assessed in combination with candidate site 045, Home Farm. My reasons are:

- The detailed proposals for site 045/HA559 (currently at pre-planning consultation) identify a range of environmental mitigation measures, including a wildlife corridor along its eastern boundary. This would be ineffectual if site 044A is subsequently developed, requiring relocation of the mitigation within the footprint of site 044A. Environmental protection measures will be more effective if developed and implemented for the combined sites.
- As an isolated site, 044A is too small to support the significant costs required to upgrade the private village sewer/waste water systems; improvements which are fundamental to the development of site 045/HA559.
- Any highway access to site 044A will cut across the remainder of site 044, probably following a similar arrangement to that proposed for site 045. This would have a significant adverse impact on the agricultural value of the residual area of site 044, encouraging future pressure for development of that larger site. Any access to site 044A needs to be designed holistically with the access for site 045 (*please see my comments for access modifications in my following responses to candidate site 045*).

Candidate Site 045 - Home Farm, Lawrenny

The footprint of this candidate site has been taken from development proposals for existing LDP site HA559, now at pre-planning consultation. There are features of the access arrangements within this footprint which need to be reconsidered. There are also some associated development conditions which should be carried forward from the current LDP.

The development conditions (Local Development Plan Appendix 2, site HA559) which need to be carried forward into the updated LDP are:

- Development of this site requires retention of a soft landscape edge to the north.
- Suitable relocation of the existing farm buildings is required prior to development proceeding.
- There may be archaeological remains at this site which is a consideration.
- Phasing is also proposed to help the development be absorbed into the village.

Vehicular access arrangements for the site, as indicated on the site plan, are unnecessarily complicated and will encourage traffic penetration through the heart of Lawrenny. The village has existing concerns about traffic associated with the popularity of visitor attractions at Lawrenny Quay and the former mansion site. These will be exacerbated if the proposed designation of the former mansion site for tourism/leisure (candidate site 046) is agreed. **Any proposals for significant new housing development in the village must aim to route vehicular access away from the narrow, single lane road through the village centre.**

At the eastern end of the site, the combination of an access road and a separate but parallel pedestrian footpath across the agricultural land to Broad Lane will inevitably undermine the viability of the residual land for agriculture, incentivising future development pressure on this land at the entrance to the village. **The access arrangements at the eastern end of the site need to be revised to minimise their impact on the agricultural land. Detailed design should ensure the access is landscaped into this prominent site at the village entrance.**

The site plan indicates development across the Open Space in the village centre bounded by Broad Lane, the Community Shop, the Long Barn and the existing access to Home Farm. **This area should not be subject to development**, having been identified in the Pembrokeshire Coast National Park Settlements Capacity Study Update Candidate Site Assessments (Newport and Lawrenny), page 36.

As outlined above, if site 044A is accepted for inclusion in the LDP, then this should be combined with site 045 to maximise opportunities for improvements to infrastructure and access arrangements.

I have illustrated suggestions to modifications to the development boundary of site 045 (Home Farm, Lawrenny) in the sketch on the following page (Appendix 1).

Candidate Site 046 – Former Mansion Site, Lawrenny

Before any proposal for very sensitive development of this site is agreed, it is essential that a traffic impact study is undertaken to consider the effects of this and the other potential developments on the narrow route through the centre of the village.

If traffic volumes are allowed to grow much more, the 'pinch point' through the village will prove very disruptive to village life and detrimental to the quiet character of the village.

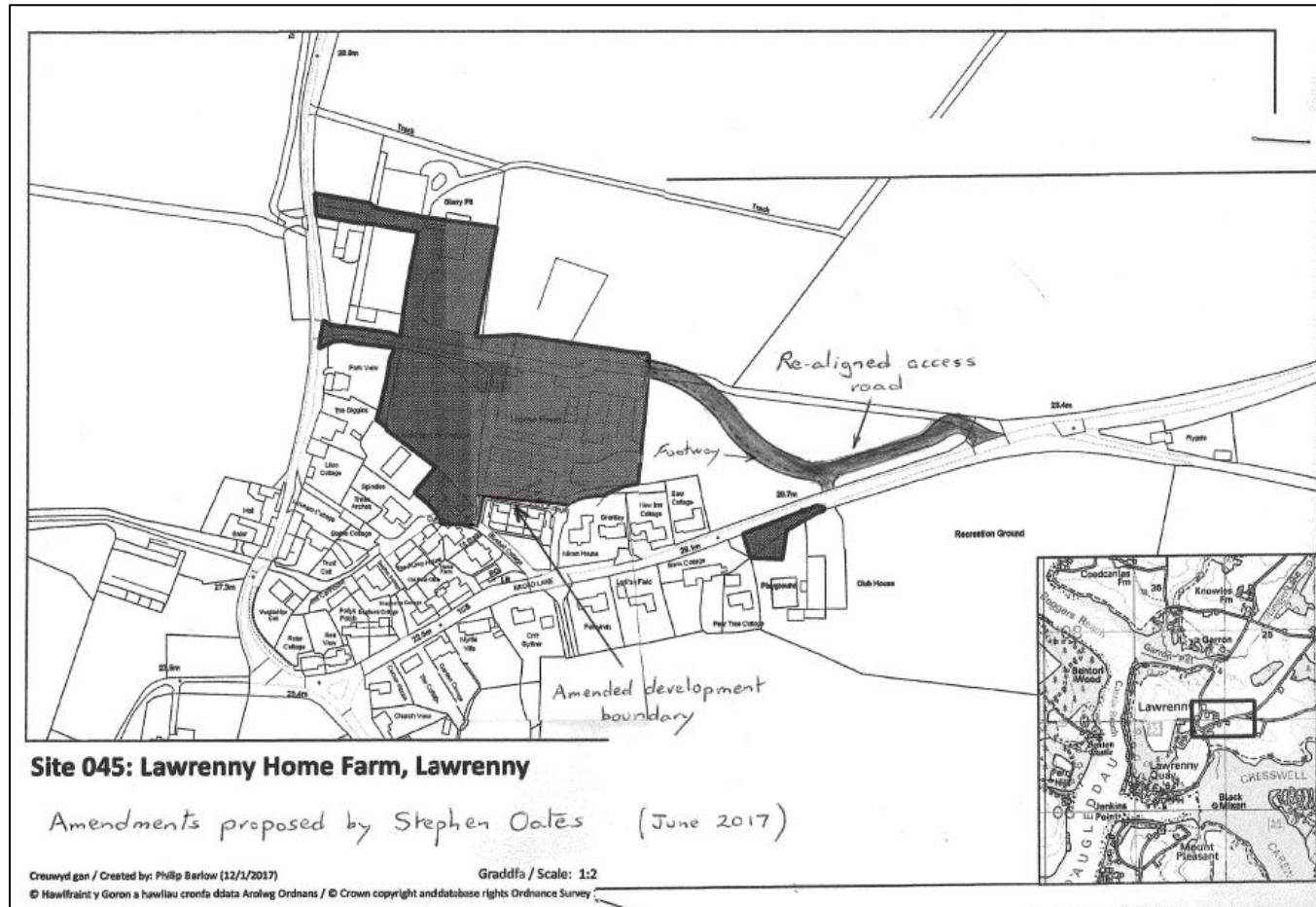
I recommend that any tourism/leisure activity on the former mansion site should be limited to low intensity development, avoiding concentrated traffic attraction in peak holiday periods.

APPENDIX 1

Proposed amendments to site 045 boundaries and access arrangements

Amendments are proposed with the aims of:

- i) reduce scope of intrusion into adjoining agricultural land by re-aligning eastern access road; and
- ii) eliminate traffic intrusion into existing village estate by preventing vehicular access to site 045 from the south.



13 April 2017

Wayne Reynolds
Atriarc Planning

Dear Mr Reynolds

LAWRENNY DEVELOPMENT – PRE-PLANNING CONSULTATION

I refer to the pre-planning consultation for the above development proposals. My wife and I were pleased to have the opportunity to discuss these with you on 24 March 2017 in the Village Shop.

For completeness, I attach as an appendix my response to your previous consultation in 2016.

I now have further comments which I set out in the following sections.

Local Development Plan

Lawrenny is a remote rural hamlet with poor links to local transport, shops and services. Its sewerage and waste water treatment facilities are not adopted as public services. Many of its recent developments are serviced via privately maintainable accesses. Shared spaces are poorly defined with minimal maintenance.

Any significant future development in the village needs to recognise and address these short-comings and move the village towards a more sustainable future, in line with Planning Policy Wales.

I accept the principle of developing the farm site for housing and recognise that the concept is supported in the Pembrokeshire Coast National Park local development plan (LDP), site HA559, which designates the site for 30 residential units in 1.07 hectares.

Since publication of that LDP there has been some development on the site, with completion of 3 residential units in the Long Barn. This leaves a balance of 27 units available for development across the remainder of the site.

Your proposal for 33 new units will take the full development up to 36 units, some 20% above the HA559 site allocation. This significant over-development introduces inherent practical difficulties. It represents a 75% increase in the size of the village; a huge change for this small community.

Concept

The consultation proposals contain many references to the physical design and layout of the development, reflecting local characteristics and creating shared space for the community.

But there is perhaps some lack of realism in understanding the expectations of potential future residents of this rural hamlet. A stroll around Lawrenny village will quickly reveal the number of homes with kayaks, canoes, dinghies and other examples of the paraphernalia that tend to accompany normal family life in the National Park. Most units in this development cater poorly for this lifestyle.

With shared parking, privately maintainable accesses and communal services, it is perhaps more akin to a mix of retirement village and holiday park.

The LDP designation of a 50% a mix of affordable housing seems unlikely to be achieved with the relatively high-cost properties of this development and their continuing service charges for basic maintenance to access ways, communal spaces, drainage and sewerage.

Highways and traffic

I have based these comments on your layout plan PL001. Your documentation also includes submissions from Matrix Consultants using different layouts, which I assume are now superseded.

I welcome the re-introduction of access via the existing farm drive to the east of the village. This is a significant facility, providing a clear entrance to the development and enabling some segregation of development traffic from the existing village tracks and driveways.

But the development proposals have otherwise hardly been adjusted to make use of this access. For example, it could easily serve the whole of the development, without the need for a traffic to circulate around and through the village to reach eastern and western properties.

I am disappointed that you propose to retain full access up the existing farm access between Mixen House and Kiki's Cottage. This was not part of the original Russell plan for the development and is physically constrained by the space available.

This access is generally no more than 3.3 metres wide over about 30 metres, with unreasonably tight geometry around house unit 32. The statement in your proposals (para 4.27) that *"shared carriageway is variable in width but never less than 4.1 metres"* is not correct and is misleading.

Units 31 and 32 have been 'shoe-horned' into Block 4 of the site to help achieve the increased density of 33 units (36 with the Long Barn). This addition creates a hazardous junction with the existing access road and pushes site traffic, as well as surface water run-off, perilously close to the rear of Kiki's Cottage.

For existing village residents, your intention to route development traffic through this sub-standard access seems inconsistent with your stated design philosophy (5.2) *"The layout has been design (sic) to slow vehicular movements and give priority to pedestrians and children. However the design allows for good access for emergency vehicles."*

Footpath

A footpath is proposed from the east of the development site towards Lawrenny Cricket Club. This apparently useful proposal lacks some essential detail.

It appears to be a surfaced pathway across an existing grazing paddock, emerging on to the narrow grass margin of Broad Lane, through gates opening outward into the public highway. This is neither a safe nor legal arrangement.

To be sufficiently attractive to users (if built to the proposed alignment), the path would need to be fenced on both sides to segregate pedestrians from cattle. But that could make the 'orphan' paddocks unviable for agricultural purposes, instead becoming areas of unmanaged land at the gateway to the village. Those would inevitably come under pressure for further housing development

The junction of the path with Broad Lane will need to be laid out to allow pedestrians to wait in safety when crossing to and from the Cricket Club.

Alternative options for this pedestrian facility seem to be:

- a) Realignment of the path to follow more closely some boundaries of the paddock, possibly in conjunction with the re-modelling of the new road junction to Broad Lane; or
- b) Redesignation of the grazing paddock to some form of community use, with the footpath as an integral part (adding this to the planning proposals).

Sewerage

I understand that the sewerage systems will not be publicly maintainable.

It should be a fundamental expectation of a sustainable development of this scale that the sewerage and wastewater treatment system will be provided to adoptable standards and subsequently adopted.

It is hard to imagine that there will ever be another opportunity to provide this basic public service, disadvantaging the village far into the future. I will expect this to be a condition of any planning permission.

Drainage

The surface water drainage details shown in the plan by Matrix Consultants (section 5.9) designate the existing green space between the Long Barn and Community Shop as an attenuation basin.

This is close to nonsense. As can be seen by anyone standing in the area, the levels will not allow creation of a basin for storm water storage without deep excavation in the heart of the village.

The scheme needs to identify an alternative site for this attenuation basin or propose some other form of water storage.

The proposals for porous surfacing and swales may be of limited value in the parts of the development with lower porosity, as found in your ground conditions report. We know that ragstone is close to the surface in the area of the shop and nearby green space.

Scheme costs

I understand that the relatively high unit costs of the development is one of the reasons given for increasing the housing density.

Without detriment to the overall quality and appearance of the scheme, I do wonder if some of the features have been 'over-specified'?

- i) The biomass network heating scheme will be a significant initial cost to the scheme, with subsequent operational support costs that will be levied on residents.

From my previous renewable energy work, I fully understand the important role of heat networks in contributing to zero carbon domestic heating. But accurate plant sizing is vital to their efficient and economic operation. Given the uncertain base and peak demands for the Lawrenny proposal, I am dubious that a biomass network is an appropriate or economically viable low carbon heating solution.

Management of a system relying on locally-sourced wood chips is a demanding overhead for the operator. Might it be simpler to base the system on commercially supplied wood pellets? (Though even these require significant management and supervision.)

Has consideration been given to alternatives such as individual air-source heat pumps in combination with solar PV? These would target individual heat demand more accurately, with lower operational costs for the estate management/energy supply company.

- ii) On the roads and pathways, there seems little justification for some of the materials proposed. For example, the use of block paving and resin-bonded gravel for the new access road, which runs through grazing land.

Across the development, the use of resin-bonded surfaces will be expensive to maintain and exceptional for Pembrokeshire villages. A simpler and cheaper form of surface treatment in the shared pedestrian/vehicular areas might deliver similar results and comply with adoptable standards for the highway authority (reducing future maintenance costs).

Property boundaries

On your Topographical Survey (Plan SUR 003) I notice that the western and northern boundaries for my property, Mixen House, are incorrect. The western boundary is actually the edge of the original farm driveway (before it was reconstructed as part of the Long Barn development). The plan also needs updating for the service changes made during work on the Long Barn.

On your location plan (SUR 001) you seem to have included Curlew Cottage within the ownership of the applicant. I believe this is incorrect.

Farm development

I will not comment on the details of the farm development other than to highlight, again, that the proposed cattle underpass will need very careful isolation from the large quantities of surface water run-off that comes down Broad Lane. You will not be wanting to be pumping all this water into the slurry store.

I hope these comments are helpful and will be taken into account in the further development of the designs in the preparation of your application for full planning consent.

Yours sincerely

Stephen Oates

cc

Pembrokeshire Coast National Park
National Trust

14 August 2016

Wayne Reynolds
Atriarc Planning

Dear Mr Reynolds

LAWRENNY DEVELOPMENT – CONSULTATION

I was pleased to have the opportunity to visit the exhibition in Lawrenny on 19 July 2016 to see the latest plans for development of Home Farm in the village. I am not clear how the consultation aspects of the day are being collated and so I am writing now to set out my thoughts on the proposals.

As a Chartered Civil Engineer with many years of experience in local government, including roles as Head of Highways and Transportation in two large authorities, I am particularly interested in some of the public aspects of the development.

I am happy with the principle of developing this site for housing and recognise that the concept is accepted in the local development plan (site HA559). Most details of the individual property designs appear broadly appropriate for this rural community. Less appropriate, in my view, are the provisions for access, services and public spaces.

My concerns fall into three main categories:

1. Highways and Traffic
2. Roadways, public areas and services, including flood risk
3. Layout details

I also have some comments about phasing and aspects of the design of the new farm site.

1. Highways and traffic

The latest plans differ significantly to those provided to me when I bought my house in 2009.

APPENDIX – Response from Stephen Oates to initial consultation August 2016

Most disappointingly, there is no longer to be access to the development along the existing farm track from the east. Instead, one of the main access routes is proposed to be via the farm drive beside my house. This is intended to service the whole of the eastern segment of the development (Areas 3, 4 and parts of 2 and 5).

This access is barely 4 metres wide over parts of its length. Your plans appear to make no provision for passing places and there is only limited provision for turning.

The junction with Broad Lane cannot accommodate conflicting turning movement into and out of the site. Without some change in layout, it is inevitable that some vehicles, especially large delivery lorries, will have to reverse back out of this access road into Broad Lane.

There will also be a conflict with the other access to the site (past Bluebell Cottage). There is not adequate visibility between these two driveways at their junctions with Broad Lane.

All these factors pose real risks to the safety of residents and road users. The existing junction and access proposals are not adequate or safe and need a thorough re-think.

The exhibition display mentions that the traffic flows measured on Broad Lane in April 2016 have been used with a 'rule of thumb' to estimate summer flows by doubling the measured flows. I would be grateful to know the basis for this estimate. From my knowledge of the village in the height of summer, the estimates seem very low. I believe there is the potential for disruption and risk to traffic through the village due to the poor quality of the access arrangements to this development.

Note: The exhibition plan 'Public spaces and vehicular access' shows a site boundary (orange line) enclosing the western section of my property. This is misleading, implying more space than is actually available for the development. My site boundary needs to be plotted accurately on any layout plans before detailed layouts are finalised.

2. Roadways, public areas and services

I understand that the new roadways, paths and public spaces will not be adopted as public highways. Nor will the associated drainage systems. These facilities will not be built to adoptable standards.

The existing sub-standard village sewer network will be placed under yet more pressure and seems to have no prospect of future adoption. Basic standards of public lighting to the common areas and pathways, an essential safety provision, also seem to have been ignored.

Without adoption of the access roads, I assume that Pembrokeshire Council's kerbside refuse and recycling service will only accept bags placed for collection within Broad Lane and other public highways. If so, that would be an intolerable nuisance in a village that already has to cope with the scattered remnants of any refuse bags left out overnight.

This is an untenable basis for a project of this scale. There has to be certainty about the provision and maintenance of basic services. It is clear that the Lawrenny Estate does not have the capacity to provide sustainable maintenance for facilities of this type and no other viable system was suggested when I visited the exhibition. If these issues are not addressed adequately, there will be significant future risks and liabilities for all residents of the village.

APPENDIX – Response from Stephen Oates to initial consultation August 2016

For example, past experience has demonstrated the risk of flooding to the lower lying properties in Broad Lane, caused by the large volumes of run-off from the farm site now proposed for development. Surface water run-off from the site must be collected and diverted away from the Broad Lane area of the village and any drainage system must be regularly maintained. If not, the risk of flooding in the village will continue and grow.

3. Layout

The latest design proposals have changed the site layout of Area 4, moving two dwellings to the immediate rear of my property.

These will be very intrusive, creating a high flank wall on the rising land above my house. It will also appear to 'block' the view of the development from Broad Lane.

I do not understand the reason or need for this significant change in the design layout and ask that this be re-visited.

Finally, some comments about phasing and design of the farm development.

I understand that, under the terms of the Local Development Plan, the housing development cannot start until the existing farm buildings have been re-located. But the housing development will be implemented in several phases over a period of time. That seems to offer the prospect of a large part of the site left untended and derelict for, at least, many years to come. Will all farm buildings be removed in advance of the housing development (by licensed contractors) and what arrangements are proposed for the management of the vacant areas pending development?

I learnt at the exhibition how the design of the new farm will minimise inconvenience to users of Broad Lane (the main access route to the village) by the installation of a tunnel under the lane for cattle. I am pleased that the designers recognise the unacceptability of a surface level crossing for cattle. But the proposed tunnel is close to the lowest part of this lane, which carries huge volumes of surface water run-off during times of heavy rain. I do not understand how any tunnel in this position can be viable unless it incorporates pumping facilities able to cope with the inevitable risk of inundation.

The low lying position of the proposed farm also creates a risk of rapid pollution to the Cleddau Rivers Special Area of Conservation if there is significant escape from the slurry storage unit. I hope that the detailed design will recognise this risk and incorporate appropriate drainage safeguards and containment.

I hope these comments are helpful and I look forward to seeing the next set of appropriately modified designs.

Yours sincerely

Stephen Oates