

Application Ref: NP/23/0168/FUL

Case Officer	Andrew Richards		
Applicant	Morgan Construction (Wales) Limited and Barcud Housing Association		
Agent	Mr Richard Banks, Evans Banks Planning Ltd		
Proposal	Construction of 54 no. dwellinghouses and residential apartments, with formation of estate roads and associated infrastructure		
Site Location	Land North of Whitlow, Saundersfoot, Pembrokeshire, SA69 9AE		
Grid Ref	SN13370532		
Date Valid	05-Apr-2023	Target Date	30-May-2023

This application is reported to the Development Management Committee as the application is classed as a major development.

Consultee Response

Saundersfoot Community Council: No objections
PCNPA Tree and Landscape Officer: Conditional consent
PCNPA Ecologist: Conditional consent
PCC Transportation and Environment: Conditional consent
PCC Head of Housing Department: Confirmation of housing mix required.
PCC Director of Education: No planning obligations required.
PCC Drainage Engineers: SAB approval required.
PCC Community Regeneration Manager: Planning obligations required.
PCC Waste and Recycling: No response received.
Natural Resources Wales: No objection
Welsh Water: Conditional consent
Western Power: No response received.
Coal Authority: Conditional consent
Cadw: No response received.

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:

- Highway safety
- Light pollution
- Impact on local community facilities
- Loss of security and privacy to neighbouring dwellings
- Potential for new dwellings to become holiday lets
- Affordable housing in perpetuity is required
- Lack of parking within village

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- Loss of wildlife within surrounding woodlands and fields
- Lack of safe access to sustainable transport facilities
- Noise pollution
- Overshadowing
- Loss of views
- Impact on existing property values
- Over bearing
- Design not in-keeping with scale, character, and appearance of properties in adjoining residential area
- Separation distances between properties
- Waste water treatment and resulting discharges to local beaches

The report below addresses the material considerations raised above.

Policies considered

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website –

[Local Development Plan 2 - Pembrokeshire Coast National Park](#)

Future Wales - The National Plan 2040 (FW which was adopted on 24th February 202

LDP2 Policy 01 - National Park Purposes and Duty

LDP2 Policy 04 - Saundersfoot Local Centre

LDP2 Policy 08 - Special Qualities

LDP2 Policy 09 - Light Pollution

LDP2 Policy 10 - Sites and Species of European Importance

LDP2 Policy 11 - Nationally Protected Sites and Species

LDP2 Policy 14 - Conservation of the Pembrokeshire Coast National Park

LDP2 Policy 15 - Open Space

LDP2 Policy 29 - Sustainable Design

LDP2 Policy 30 - Amenity

LDP2 Policy 31 - Minimising Waste

LDP2 Policy 32 - Surface Water Drainage

LDP2 Policy 33 - Renewable Energy & Low Carbon Energy

LDP2 Policy 46 - Housing

LDP2 Policy 47 - Housing Allocations orl and with Planning Permission

LDP2 Policy 48 - Affordable Housing

LDP2 Policy 50 - Housing Development Proposals

LDP2 Policy 51 - Housing Densities

LDP2 Policy 52 - Housing Mix

LDP2 Policy 54 - Community Facilities

LDP2 Policy 55 - Infrastructure Requirements

LDP2 Policy 59 - Sustainable Transport

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LDP2 Policy 60 - Impacts of Traffic

PPW11

SPG01 - Affordable Housing

SPG02 - Landscape

SPG04 - Planning Obligations

SPG05 - Seascape Character

SPG06 - Archaeology

SPG07 - Biodiversity

SPG09 - Coal Works - Instability

SPG11 - Parking Standards

SPG14 - Renewable Energy

SPG16 - Sustainable Design & Development

TAN 02 - Planning and Affordable Housing

TAN 05 - Nature Conservation and Planning

TAN 06 - Planning for Sustainable Rural Communities

TAN 08 - Renewable Energy

TAN 11 - Noise

TAN 12 - Design

TAN 15 - Development and Flood Risk

TAN 16 - Sport, Recreation and Open Space

TAN 18 - Transport

TAN 24 - The Historic Environment

Constraints

Special Area of Conservation - within 500m

LDP Allocation

Biodiversity Issue

Ancient Monument - within 500m

Recreation Character Areas

Low Coal Risk

Surface Coal

High Coal Risk

Affordable Housing Submarkets

Seascape Character Areas

Landscape Character Area

Officer's Appraisal

Background and History

The application site comprises a large section of an existing agricultural field immediately north of Whitlow residential estate within Saundersfoot. The field is irregular in shape and has ground levels which fall away from the adjacent housing

estate and also from the adjacent B4316 access road. An existing field access gateway is currently located within the south east corner of the site and a further field access into the adjoining field to the north is provided within the south west corner of the site.

Current Proposal

Planning approval is sought for the construction of 54 No. dwellinghouses and residential apartments together with the formation of estate roads and associated infrastructure. This would include 19 affordable housing units.

The plans submitted with the application show an indicative site layout of 54 houses comprising:

- 2 No. 1 bed semi-detached bungalows – affordable units (plots 14 and 15)
- 2 No. 1 bed detached flats – affordable units (plots 31 and 32)
- 1 No. 2 bed detached bungalow affordable unit (plot 16)
- 6 No. 2 bed semi-detached houses – affordable units (plots 19-24)
- 2 No. 3 bed semi-detached houses – affordable units (plots 17 and 18)
- 6 No. 1 bed flats – affordable units (plots 25-30)
- 19 No. 1 and 2 bed apartments (plots 33-51)
- 8 No. 3 bed semi-detached houses (plots 3-4, 5-6, 7-8 and 9-10)
- 5 No. 3 bed detached bungalows (plots 12, 13, 52, 53 and 54)
- 3 No. 4 bedroom detached house (plots 1, 2 and 11)

Key Issues

The application raises the following planning matters:-

- Policy and Principle of Development
- Visual Amenity and Special Qualities of the National Park
- Impact on Scheduled Monuments
- Planning Obligations and Affordable Housing
- Siting and Sustainable Design
- Amenity and Privacy
- Access and Parking
- Landscaping
- Biodiversity
- Land Stability
- Land Drainage
- Other Material Considerations

Policy and Principle of Development:

The site is located within the Centre boundary of Saundersfoot Local Centre as defined by Local Development Plan 2 (“LDP2”). Policy 4 of the Plan sets out the land use priorities for Saundersfoot and include providing for and permitting housing to facilitate the delivery of the affordable housing needs of the local area and to ensure that developments permitted contribute to the protection and enhancement of the village’s special qualities. Policy 50 ensures that housing development is appropriately located and suitable in scale and type to meet Strategic Policies 2, 3, 4, 5, 6 and 7.

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The site is allocated for residential development under Policy 47 of LDP2 and is identified as HA3 on the Proposals Map. As such the principle of residential development on this site is established. Policy 47 identifies the site as having an estimated 54 dwellings in total with 19 of those being affordable units (35%). These figures are based on the information provided in the Land Implementation Study (December 2017).

The proposal is considered to be compliant with Policy 47 in terms of the overall site density and number of affordable units. It is also compliant with Policy 51 (Housing Densities) by achieving a residential density of 30 dwellings per hectare. 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 the current evidence of housing need in the National Park. It is considered that this proposal complies with Policy 52.

Policy 55 of LDP2 sets out the infrastructure requirements linked to development proposals. In addition to affordable housing provision, the Authority will seek contributions towards recreational and amenity open space, sustainable transport, education, and other community facilities.

Planning Policy Wales (Edition 11, February 2021) states at paragraph 3.58 that agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification is the best and most versatile land and should be conserved as a finite resource for the future and so conditions should be applied to any planning permission granted to ensure that the soil resource can continue to provide identified benefits.

The majority of the site is located on soil classified as Grade 3a agricultural land. This was taken into consideration during the preparation of LDP2 and the allocating of land for development. The plan process was subject to a Sustainability Appraisal which filtered out the overall least sustainable sites. The need to develop land within the best and most versatile agricultural grades has been considered against the need to provide for affordable housing needs in the National Park. The site is relatively small in scale and would not be considered to be significant under WG guidelines.

Therefore, the proposed residential development has been established, in principle, through the allocation of the land in LDP2. The current proposal for 54 no. dwelling houses, of which 19 (35%) are proposed to be affordable, of different sizes, types, and tenures, is considered to comply with Policies 4, 47, 50, 51, 52 and 55 of LDP2 and is therefore acceptable, in principle.

Visual Amenity and Special Qualities of the National Park:

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 adverse impact on these special qualities and key characteristics in this instance and will not result in a factor which detracts 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.

Impact on Scheduled Monuments:

The application site lies some 430 metres to the northeast of the Tramroad Incline at Saundersfoot (PE479) which is a Scheduled Ancient Monument. Cadw has been consulted as part of the application process and has not responded to date. Officers consider that given the intervening level of landscaping and built form between the application site and the site of the monument there will be no intervisibility and therefore no adverse impact from the proposed development on the existing monument's setting.

Planning Obligations and Affordable Housing:

Correspondence has been received which raises concerns on the proposed affordable housing in being retained for that use in perpetuity and impact on local community facilities.

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Policy 55 states that the Authority will seek to obtain benefits to contribute to dealing with the most acute areas of need for National Park communities. This will include consideration of affordable housing; recreational and amenity open space; sustainable transport facilities; educational facilities; community facilities (including libraries); public art; and biodiversity. The provision of affordable housing is a main priority of LDP2.

Policy 47 indicates that the Authority will seek to obtain a 35% affordable housing requirement for this site. The current proposal for 54 no. dwelling houses, of which 19 (35%) are proposed to be affordable will meet the requirements set out within LDP2 for this allocated site. The agent is currently in the process of drafting a section 106 legal agreement for the Authority's approval to ensure that these affordable housing units can be secured through this planning application and maintained in perpetuity which will also address the concerns raised in correspondence.

In addition to the affordable housing requirement set out above, consultations with Pembrokeshire County Council on other planning obligations have been completed and there is also a need for further financial contributions within the following areas:

Recreational and Amenity Open Space: £25k for upgrading existing play facilities adjacent to the Regency Hall Community Facilities: £5k to purchase furniture to upgrade the Regency Hall Library Services: £54.58 per household
Sustainable Transport Facilities: Highway enhancements as indicated within relevant section of the report.

Biodiversity:

Biodiversity enhancements as indicated within relevant section of the report.

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

The additional financial contributions listed above will also be included within the section 106 legal agreement being drafted by the agent and will set out how and where this money will be allocated and the relevant stage payments where appropriate.

A 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 on local community facilities.

Siting and Sustainable Design:

Correspondence has been received which raises concerns on the design of the properties not being in-keeping with the scale, character, and appearance of other properties in adjoining residential areas and that the development will have an overbearing impact on neighbouring dwellings.

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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 proposed new 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 in-keeping within this area of Saundersfoot.

The concerns raised on scale, overbearing, character and appearance are not shared by officers given that they have worked with the development team at pre-application stage to ensure that the overall design and prominent frontages are respectful to the site and its sensitive surroundings.

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 on the separation distances between new properties and existing properties within adjacent residential estates, overshadowing, noise pollution from the building work, loss of security and privacy to neighbouring dwellings, and light pollution from vehicles using the new road layout within the site.

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 south and a caravan site to the east with woodland and agricultural fields remaining to the north and west.

The application includes several documents which set out environmental aspects and impact risk assessments for the construction phase. These documents will be conditioned as part of any approval granted by the Authority and a separate condition relating to the operation times and deliveries for the development would be imposed to ensure all works are carried out on site within the hours of 0730 to 1800 hours Monday to Saturday and no deliveries before 0800 hours Monday to Saturday and no work to be carried out on Sundays or bank holidays. This will address the concerns raised on noise during the construction works.

The potential for the development to have an adverse impact on the existing dwellings situated within Whitlow estate have been considered carefully and given the separation distances which have been measured and are at 22 metres at the

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closest point and on average between 25-28 metres, this is considered to be acceptable and therefore officers do not align with the concerns raised on proximity of the development to neighbouring dwellings.

A concern raised on scale and over bearing from the new dwellings is not shared by officers, given that four of the new semi-detached dwellings along this stretch are 2&1/2 storey the site level are lower than the site levels within Whitlow estate and this is evidenced by the need for retaining walls as indicated on the submitted site plans. Officers consider that the proposed scale, design, orientation, and layout will ensure that the level of impact from the new development on the existing residential properties within Whitlow estate will be of an acceptable level and not cause any significant adverse impact on privacy or amenity impact through overshadowing.

In respect of the potential for light pollution from vehicles using the new roads within the scheme, it is considered that given the proposed layout of the roads and associated built form, there will be very little impact from vehicle head lights on neighbouring residential estates. The drop in levels away from the existing residential estate will also assist in containing potential light spillages in this respect.

Loss of security to existing residential properties has been raised as a concern. The proposed scheme does include boundary fencing to the shared boundaries with proposed dwellings No's 1 -13 and the adjacent properties within Whitlow estate. The proposed timber hit and miss boundary fencing will be 1.8 metres high and is considered to provide a secure boundary treatment for the development at this location. Notwithstanding this aspect adjacent neighbours are also able to erect a 2metre fence under permitted development rights if they so wish in this instance.

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 not be adversely affected in this instance.

Access and Parking:

Correspondence has been received which raises concerns on the lack of safe access to sustainable transport facilities within the village, lack of parking within the village and highway safety in respect of the proposed development.

Pembrokeshire County Council Transportation and Environment section has previously provided pre-application advice on this site (dated 27th February 2023), wherein it was advised that they had no objection in principle to the application but recommended improvements to the existing vehicular access, pedestrian link, provision of improvements to the local bus service infrastructure and the submission of a transport statement and CTMP (Construction Transport Management Plan). In particular, officers drew the attention of the Applicant to the need to provide improvements to a pedestrianised link to facilitate movement to Frances Lane and nearby Coppet Hall Beach Area.

The proposal includes each dwelling receiving between 1 and 2 parking spaces dependent upon the size of the residence. Additionally, there are 5 visitors spaces identified on the plan and it is recognised that these may become utilised by future residents of the development.

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The submitted information in support of the application at Land North of Whitlow, Saundersfoot indicates a proposed new single access of 6.0m wide with a 2.0m wide footway across both sides of the access and extending down the western side of the B4316 to link in with existing footway. The proposed access and footway will require the translocation of the existing hedgerow in order to obtain sufficient visibility for a 30mph speed limit (2.4m x 43m in either direction). At present, the horizontal alignment of the carriageway and hedgerow would preclude sufficient visibility in the leading direction (right hand from access) of oncoming vehicles. By setting back the hedgerow (to the north of the access) and implementing a footway (to the south of the access), sufficient visibility in both directions can be secured.

A background check of accidents in the area indicates that there have been no accidents in the last five years at the point of access; there was one serious accident to the north of the site which occurred in 2021 as a result of driver behaviour. The B4316 acts as a connector route into Saundersfoot from the surrounding area, and therefore is subject to higher traffic flows in the peak tourist seasons.

The Applicant has not provided any trip generation information for the proposed development, despite the recommendation to do so from PCC Highways section in the pre-application advice. The PCC Highways section has undertaken its own assessment utilising TRICS which indicates that there is likely to be 26 AM (two-way) movements and 25 PM (two-way movements) during the peak hours on the network; this equates to approximately 3 vehicles per minute (rounding up). This is not considered to be a significant impact on the local highway network.

Pedestrian movement within the site is facilitated by a proposed footway on both sides of the internal access road, and residents in the northern section also benefit from an additional connection through the site to the access road. There is no provision or additional benefit mentioned of improving the nearby Right of Way to connect with Frances Road, nor mention of any improvements to the nearby bus stops, nor has the Applicant indicated secure storage for bicycles; these are missed opportunities to encourage Active and Sustainable Travel for future residents considering the close nature of the site to the village centre of Saundersfoot. The PCC Highways section has recommended conditions on the implementation of cycle storage and revised plans should be submitted. With regards to improvements at the nearby bus stops, the Highways section has also recommended a financial contribution to be made. Facilitating Active Travel and Sustainable Travel options will enable the number of private vehicles trips to be reduced and encourage shorter journeys into Saundersfoot to be taken by alternative modes. The planning obligation contributions will be secured through a Section 106 agreement being drafted by the agent and will set out how and where this money will be allocated and the relevant stage payments where appropriate.

With regards to Construction Phase, the Applicant has submitted a Construction and Transport Management Plan (Drawing Reference: R548 P-02E), which indicates that there is sufficient space on site to store materials and provide parking for contractors. The original access arrangement is to be used for construction traffic, which does not suffer from the same visibility issues as the southern proposed access and is at the start of the 30mph speed limit.

Therefore, officers consider that the above considerations will address the concerns raised on the highway safety in respect of the proposed development. In respect of the concerns raised on safe access to sustainable transport facilities within the village, officers understand that PCC Highways section is currently undertaking works to improve access to sustainable transport facilities which include routes to the local train station and up to the A487. With regards the concerns raised in respect of a lack of parking within the village, whilst these concerns are recognised by officers it is considered that this current application process would not be the correct forum to address this issue.

Landscaping:

The information provided within the revised tree survey 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.

Biodiversity:

Correspondence has been received which raises concerns on the potential loss of wildlife within surrounding woodlands and fields.

The Authority's ecologist has indicated that the updated Landscape & Ecology Management Plan (LEMP) is acceptable and can be supported subject to a condition to ensure all works are carried out in accordance with this document.

Limited details of external lighting have been submitted with the application and as such a further condition will be imposed to control all external lighting features.

The application site is also approximately 400m from the Carmarthen Bay and Estuaries Special Area of Conservation (SAC). As a competent authority under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 the authority has to consider the impact of development on the features for which the aforementioned sites are designated. A Test of Likely Significant Effect (TLSE) and, if necessary, an Appropriate Assessment will be undertaken and sent to NRW to comment. The submitted CEMP will be used to support the Habitat Regulations Assessment (HRA) when considering potential impacts to the adjacent watercourse which feeds into the nearby SAC. The recommendation will take account of the need for the HRA to be completed prior to any determination.

The above aspects will ensure that the wildlife within and surrounding the development site will be maintained and also enhanced therefore addressing the concerns raised.

Land Stability:

The Planning team at the Coal Authority concurs with the recommendations of the Coal Mining Risk Assessment – Desk Study that coal mining legacy potentially poses a risk to the proposed development and that intrusive site investigation works should be undertaken prior to development commencing in order to establish the exact situation regarding coal mining legacy issues on the site. A condition will be added to any consent granted to cover these aspects.

Land Drainage:

Correspondence has been received which raises concerns with the local waste water treatment and resulting discharges to local beaches.

Welsh Water has indicated that the developer proposes that foul water flows from the development are to be disposed of via the public sewerage system. Therefore, no objections are raised in principle to the foul flows discharging to the public sewer. The application also specifies the proposed method of surface water disposal to be via a sustainable drainage system and therefore to ensure there is no detriment to the public sewerage system. Conditions will be added to cover these aspects together with Informative Notes.

The concerns raised on local discharges to beaches should be made directly to Welsh Water and cannot be considered as part of this application process.

Other Material Considerations:

Correspondence has been received which raises concerns on the potential for the new dwellings to become holiday lets. The following consideration on C3 use restrictions is considered to address these concerns in full.

C3 Use Restrictions

In line with a report considered by the National Park Authority in its March 2023 meeting (link here): National Park Authority 29/03/23 - Pembrokeshire Coast National Park

Please see item 9 08/23 a report on ‘The implications of recent Welsh Government Legislative and Planning Policy Changes in relation to Second Homes and Short-term lets’.

This report highlights that officers consider that additional analysis of data and further research would be required if the Authority wished to explore establishing an Article 4 Direction. The report also highlights that the amendments to the Use Classes Order may also be applied by Local Planning Authorities by way of planning conditions to restrict the use of a development to one particular use class within the order, removing permitted development rights to move between uses.

The recommendation of the report was that Members noted its contents and supported actions in relation to:

- Further exploration of data and evidence that might inform the establishment of an Article 4 Direction.
- The imposition of planning conditions is considered on applications for planning permission on a case-by-case basis via normal development management procedures.

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A report considering the C3 use restrictions is provided in Addendum A attached to this report and in summary it is considered that in terms of the current planning application the part of the development that has the potential to have a significantly higher prevalence of holiday and second homes is the open market apartments/flats.

19 no. 1 and 2 bed apartments In blocks of 4 and 5. And a standalone 2 bed apartment 33-51

As advised earlier 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.

As outlined above, there is not considered sufficient justification from evidence to apply a condition to the estate houses proposed within the development. There is however considered evidence to warrant application of a condition to the apartment style properties, given the high prevalence of use of such style properties as second homes and holiday lets in Saundersfoot.

In this instance that would mean that 71% of the 19 apartments – 13 apartments – should be conditioned as C3 use (use as a sole or main residence) only.

Policy 13 (Supporting Digital Communications) of Future Wales indicates the Welsh Government supports the provision of digital communications infrastructure and services across Wales. Planning authorities must engage with digital infrastructure providers to identify the future needs of their area and set out policies in Strategic and Local Development Plans to help deliver this. New developments should include the provision of Gigabit capable broadband infrastructure from the outset. Openreach will install Fibre to the Premises (FTTP) as part of their mission to build the best possible network with the highest quality of service, making sure everyone in the UK can be connected.

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 11), 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.

Recommendation

For the application to be delegated to the Chief Executive, Director of Planning or to the Team Leader to issue consent upon receipt of a completed HRA and legal agreement to cover the planning obligations including affordable housing delivery, its retention in perpetuity and subject to the conditions set out below. If no completed HRA or legal agreement is received within 3 months officers would request that

delegation is also given to allow refusal of the application due to a lack of mechanism of securing planning obligations and affordable housing in accordance with Policies 48 and 55 of LDP2.

In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the Well Being of Future Generations (Wales) Act 2015. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive, and resilient communities.

Conditions

1. The development shall begin not 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:
Drawing Reference: R548 P-02H (Received 23.03.2023)
Drawing Reference: R548 P-03B (Received 23.03.2023)
Drawing Reference: R548 P-04B (Received 20.03.2023)
Drawing Reference: R548 P-06A (Received 23.03.2023)
Drawing Reference: R548 P-07A (Received 23.03.2023)
Drawing Reference: R548 P-08B (Received 23.03.2023)
Drawing Reference: R548 P-09C (Received 23.03.2023)
Drawing Reference: R548 P-10C (Received 23.03.2023)
Drawing Reference: R548 P-11C (Received 23.03.2023)
Drawing Reference: R548 P-12C (Received 23.03.2023)
Drawing Reference: R548 P-13C (Received 23.03.2023)
Drawing Reference: R548 P-14C (Received 23.03.2023)
Drawing Reference: R548 P-15B (Received 23.03.2023)
Drawing Reference: R548 P-16C (Received 23.03.2023)
Drawing Reference: R548 P-17C (Received 23.03.2023)
Drawing Reference: R548 P-18C (Received 23.03.2023)
Drawing Reference: R548 P-19C (Received 23.03.2023)
Drawing Reference: R548 P-21C (Received 23.03.2023)
Drawing Reference: R548 P-22C (Received 23.03.2023)
Drawing Reference: R548 P-23B (Received 23.03.2023)
Drawing Reference: R548 P-24B (Received 23.03.2023)
Drawing Reference: R548 P-25A (Received 23.03.2023)
Drawing Reference: R548 P-26A (Received 23.03.2023)
Drawing Reference: R548 P-27A (Received 23.03.2023)
Drawing Reference: R548 S-01C (Received 23.03.2023)
Drawing Reference: R548 P-21C (Received 23.03.2023)
Drawing Reference: R548 P-21C (Received 23.03.2023)
Drawing Reference: R548 P-21C (Received 23.03.2023)
Drawing Reference: RS230324-02-001 (Received 09.08.2023)
Design and Access Statement (Received 23.03.2023)
Ecology Report – Updated (Received 23.03.2023)

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Tree Survey (Received 31.07.2023)

Transport Statement (Received 11.05.2023)

Construction Environmental Management Plan – CEMP (Received 02.05.2023)

Project Environment Aspects and Impact Register (Received 02.05.2023)

Construction Site Setup and Traffic Management Plan (Received 02.05.2023)

Whitlow Tree Constraints Plan (Received 02.05.2023)

Whitlow Revised Site Layout Jan 2023 Tree Constraints Plan (Received 02.05.2023)

Whitlow Revised Site Layout Jan 2023 Shade Plan (Received 02.05.2023)

Coal Mining Risk Assessment – Desk Study Report No. Q0753 (Received 05.04.2023)

Drainage Strategy Report (Received 20.03.2023)

Drainage Strategy Plan (Received 20.03.2023)

Engineering Layout (Received 23.03.2023)

Landscape and Ecology Management Plan – LEMP (Received 09.08.2023)

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. The construction phase operation times for the development shall only be carried out on site within the hours of 0730 to 1800 hours Monday to Saturday and deliveries within 0800 to 1800 hours Monday to Saturday and no work shall be carried out on Sundays or bank holidays.
Reason: To protect the amenities of the occupiers of nearby dwelling houses. Policy: Local Development Plan 2 – Policy 30 (Amenity).
5. No development shall commence until:
 - a) a scheme of intrusive investigations has been carried out on site to establish the risks posed to the development by past coal mining activity, and;
 - b) any remediation works and/or mitigation measures to address land instability arising from coal mining legacy, as may be necessary, have been implemented on site in full in order to ensure that the site is safe and stable for the development proposed.The intrusive site investigations and remedial works shall be carried out in

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accordance with the approved scheme and authoritative UK guidance.
Reason: in the interests of conserving public health and local amenity. Policy: Local Development Plan 2 – Policy 30 (Amenity) and Planning Policy Wales (Edition 11, February 2021).

6. Prior to the occupation of any part of the development, or it being taken into beneficial use, a signed statement or declaration prepared by a suitably competent person confirming that the site is, or has been made, safe and stable for the approved development shall be submitted to the Local Planning Authority for approval in writing. This document shall confirm the methods and findings of the intrusive site investigations and the completion of any remedial works and/or mitigation necessary to address the risks posed by past coal mining activity.
Reason: in the interests of conserving public health and local amenity. Policy: Local Development Plan 2 – Policy 30 (Amenity) and Planning Policy Wales (Edition 11, February 2021).
7. Prior to commencement of the housing element, the Applicant shall enter into a S278/S38 agreement to construct the new access arrangement, footways, and internal estate road, in accordance with a design scheme similar to that shown in Drawing Reference: R548 P-02H. Detailed designs to be submitted to, and approved in writing, by the Local Planning Authority.
Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 11, February 2021).
8. Upon completion of the main access into the site, and with the written agreement of the Local Planning Authority, the existing access to the north of the site shall be stopped up in accordance with the approved plans. All hard-core to be removed and hedgerow to be reinstated.
Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 11, February 2021).
9. Prior to the first occupation of any dwelling, the Applicant shall submit a scheme to extend the existing 30mph speed limit northwards in a scheme to be submitted to, and agreed in writing, with the Local Planning Authority and Pembrokeshire County Council's Traffic Management Team. The successful scheme shall then be taken forwards within a Traffic Regulation Order with the Applicant responsible for all costs.
Reason: In the interests of road safety. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 11, February 2021).
10. Visibility splays of 2.4m x 43m, as indicated on DWG. AP02 (dated 16 March 2023) shall be constructed prior to first occupation in either direction from the main access and remain free and clear of obstruction over 0.6m in height. Visibility splays shall be maintained for the duration of the development.
Reason: In the interests of road safety. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 11, February 2021).

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11. Prior to commencement of the housing element, the internal estate road, driveways, and footways will be completed to base course level. The internal estate road, driveways and footway will be completed to surface course level, with the agreement of the Local Planning Authority, prior to first occupation. Reason: In the interests of road safety and to protect the amenity of local residents from excessive noise, vibration, smoke, odour, and dust. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 11, February 2021).
12. Prior to occupation of any part of the development, facilities for the safe and secure storage of bicycles for each residential unit shall be indicated on amended plans, and shall be submitted to, and agreed in writing, by the Local Planning Authority. Thereafter, cycle storage facilities as agreed are to remain on site in perpetuity. Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 11, February 2021).
13. Prior to occupation of any part of the development, facilities to provide ULEV charge points shall be installed according to a scheme to be submitted to, and approved in writing, by the Local Planning Authority. Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 11, February 2021).
14. Prior to commencement of development, facilities for the drainage and storage of surface run-off shall be incorporated into the site within a scheme to be submitted to, and approved in writing, by the Local Planning Authority. There shall be no surface-water runoff to be permitted within the Public Highway. Reason: In the interests of road safety. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 11, February 2021).
15. Parking within the site, for residents and visitors, shall be in accordance with details submitted on Drawing Reference: R548 P-02H, and be provided prior to first occupation, and thereafter retained for that purpose. Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 11, February 2021).
16. The swept path arrangement for refuse and emergency vehicles as indicated on Drawing Reference: AP01 (Dated 16 March 2023) as submitted to and approved in writing by the Local Planning Authority, shall be kept clear at all times for the manoeuvring of vehicles. Reason: In the interests of road safety. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 11, February 2021).
17. Construction shall take place in accordance with the details set out in the Construction Traffic Management Plan (Drawing Reference: R548 P-02E). All

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Lorry/Delivery Vehicles and staff to use the existing access arrangement, until such time as the proposed main access is made available.

Reason: In the interests of road safety and to protect the amenity of local residents from excessive noise, vibration, smoke, odour, and dust. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 11, February 2021).

18. Prior to occupation of any part 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 project Arboriculturist supervision schedule. Proof will be demonstrated through the submission of written evidence along photographic documentation where necessary to confirm 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. 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), Supplementary Planning Guidance 07 (Biodiversity), Technical Advice Note (TAN) 5:Nature Conservation and Planning (2009), Technical Advice Note (TAN) 10:Tree Preservation Orders (1997).

19. The development shall take place in accordance with Landscape & Ecology Management Plan (LEMP) – March 2023. 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 Local Planning Authority.

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. 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), Supplementary Planning Guidance 07 (Biodiversity), Technical Advice Note (TAN) 5:Nature Conservation and Planning (2009), Technical Advice Note (TAN) 10:Tree Preservation Orders (1997).

20. Prior to the commencement of development on the site, an external lighting scheme shall be submitted for the consideration and written approval of the local planning authority. The scheme shall take into account all of the lighting needs and mitigation requirements associated with the development during operational hours and shall be the minimum required to perform the relevant lighting task. It shall be specifically designed to minimise the risk of light spillage beyond the development site boundary and within ecologically sensitive areas.

The scheme shall include:

- A report, prepared by a lighting engineer, setting out the technical details of the luminaires and columns, including their location, type, shape, dimensions and, expected luminance output and specifically explaining what design attributes have been chosen to minimise light pollution.
- A plan illustrating illuminance levels across the development site and at

the boundary of the site. The level of illuminance should be appropriate to the character of the surrounding area as a whole.

- A statement which demonstrates how the lighting scheme will be viewed against the wider landscape and, where appropriate, the potential role of landscaping in minimising the day and night-time visual impact of the installation.

- An Environmental Lighting Impact Assessment against conservation requirements for protected species and designated landscapes.

Once approved in writing, the lighting scheme shall be implemented and thereafter operated in accordance with the approved details.

Reason: To ensure that animal, plant species and habitats listed under the Conservation of Habitats and Species Regulations 2010 are adequately protected, and to protect and enhance the character and appearance of the site and its setting within Pembrokeshire coast National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity) and 14 (Conservation of the Pembrokeshire Coast National Park).

21. The development works shall be carried out strictly in accordance with the submitted Construction Environmental Management Plan (CEMP) during the site preparation and construction phases of the development. 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 Local Planning Authority.

Reason: To ensure necessary management measures are agreed prior to commencement of development or phase of development and implemented for the protection of the environment during construction. Policy: Local Development Plan 2 - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 10 (Sites and Species of European Importance), 11 (Nationally Protected Sites and Species), 14 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

22. No development shall take place until a plan(s) has been submitted to the local planning authority and approved, in writing, identifying the 13 units of accommodation which shall be used for Use Class C3 only, and for no other purpose (including any other purpose in class C5 or C6 or a mix of C3, C5 and/or C6 uses) and the units so identified on the approved plan shall be used for Use Class C3 only, and for no other purpose (including any other purpose in class C5 or C6 or a mix of C3, C5 and/or C6 uses) notwithstanding Part 1 Class I of the schedule to the Town and Country Planning (Use Classes) Order 1987 as amended (or in any provision equivalent to that class in any statutory instrument revoking and re-enacting that order with or without modification).

Reason: This permission has been granted having regard to the special circumstances of the case and use not in accordance with the requirements of the condition would require the further consideration of the Local Planning Authority in the light of the Local Development Plan 2 and any other material considerations. Policy: Local Development Plan 2 – Policy 7 (Countryside) Policy 30 (Amenity), Policy 40 (Self-catering Development) and Policy 52

(Housing Mix).

23. Prior to commencement of the housing element of the development hereby permitted a scheme to enable the provision of gigabit capable broadband infrastructure, which includes a timetable for implementation, shall be submitted to and agreed in writing by the local planning authority.
Reason: To support the roll-out of digital communications infrastructure across Wales in accordance with Policy 13 of Future Wales (2021).

Informatives

1. The applicant's attention is drawn to the consultation response from Welsh Water.
2. From 7th January 2019, all new developments of more than one property or where the construction area that has drainage implications is 100 square metres or more will require sustainable drainage systems (SuDS) for surface water. The SuDS must be designed and built in accordance with Statutory SuDS Standards published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SuDS Approving Body (SAB) role before construction work begins. Pembrokeshire County Council as SuDS Approving Body (SAB) considers that by virtue of the fact that the proposals consist of the construction of more than one property, the proposed works will require SAB approval prior to the commencement of any works on site relating to this application.

The applicant should be made aware that the granting of planning consent for this application does not remove the requirement to gain SAB approval.

3. The applicant's attention is drawn to the consultation response from Pembrokeshire County Council Drainage Engineers.
4. 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 Care 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 Street Care team can be contacted via streetcare@pembrokeshire.gov.uk or 01437 7764551 for an updated list.

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,

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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).

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.

If planning permission is granted, the applicant/developer shall advise the County Highway Authority if it is their intention to offer the road up for adoption and enter into a Section 38 Roads Adoption Agreement or whether the development will remain private. The Highways Development Team can be contacted via hwdcconsult@pembrokeshire.gov.uk.

Addendum A

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 for holiday letting and second homes 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 proposal is for

Number		Type	Tenure	Notes	Plots
19 no.	1 and 2 bed	apartments		In blocks of 4 and 5. And a stand alone 2 bed apartment	33-51
2 no.	1 bed	detached flats	Affordable	2 storey	31&32
6 no	1 bed	flats	Affordable	3 storey	25-30
2 no.	1 bed	semi-detached bungalows	Affordable		14&15
1 no	2 bed	detached bungalow	Affordable		16
5 no.	3 bed	detached bungalows			12,13,52,53,54

² [9e6c81c7-b186-cad3-b5c9-99dab34d40f7 \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/9e6c81c7-b186-cad3-b5c9-99dab34d40f7) – 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

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6 no	2 bed	semi-detached houses	Affordable		19-24
2 no	3 bed	semi- detached houses	Affordable	2 storey	17&18
8 no.	3 bed semi-	detached houses			3,45,6,7,8,9,10
3 no.	4 bedroom	detached house		2 storey	1&2&11

- 54 residential units are proposed of which 19 affordable units (the affordable housing requirement set out in Policy 47 Housing Allocations or Land with Permission for allocation HA3). The offer of 19 affordable dwellings has been agreed with the applicant (19 social rented properties with the agent advising that internal space standards will meet Welsh Government Development Quality Requirements being met.
- Other obligations required include onsite informal open space provision, sustainable transport facilities contributions, community facilities contribution, recreational and amenity open space contribution, library services, waste and biodiversity enhancements.

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 slightly 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%)

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

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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: However, 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.

Method used⁷: Using 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%

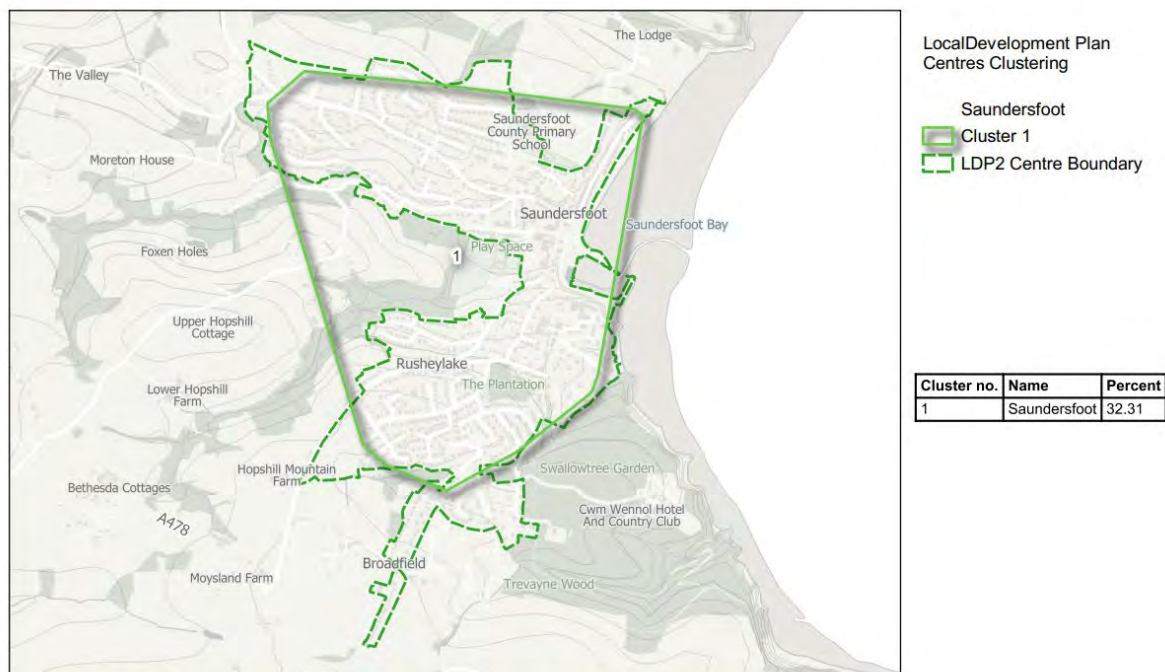
The application site lies within cluster 1.

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

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The map below identifies the location of the cluster. The application site lies within the cluster. 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.



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 slightly 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 on this basis only there would be limited justification for the application of a C3 occupancy condition to the market properties within the proposal.

Next the report considers whether the patterns of development of large-scale sites (5 or more residential units) more recently or the type of the development proposed show a higher prevalence.

Recent Housing Completions on large sites: This section considers how recent housing developments of five or more dwellings that have been developed in

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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. The site shows an estimated 17% of housing completions are in use as either holiday let or second homes. 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 (an estate) 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, involves new build development. flats and houses are included.

Firstly in terms of a flatted style development, this has been considered in terms of prevalence of holiday let and second homes in similar developments in Saundersfoot. 6 such 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.

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 flatted type element within the residential units on the application site.

The second type of development considered is estate type developments.

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	Second and Holiday Home (%)		Near Whitlow	
1	7.14	Near Whitlow	4.93	Average
2	0	Near Whitlow	3.57	Median
3	0	Near Whitlow	12.5	High
4	7.69	Near Whitlow	0	Low
5	12.5	Near Whitlow		
6	0	Near Whitlow		
7	0	Near Whitlow		
8	12.07	Near Whitlow		
9	18.75			
10	1.85			
11	20.69			
12	11.48			
13	32.73			
14	11.76			
15	28.95			
16	0			
All Sites	average	10.35		
	median	9.6		
	Low	0		
	High	32.73		

The analysis of similar types of developments, (in this case estate type 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 in principle for applying a C3 occupancy condition to the estate element provision of the residential units on the application site.

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

Item 5 - Report on Planning Applications

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. Seven years of the Plan have elapsed, and 211 residential units have been completed. This shows that when considered on an annual basis then this requirement is being achieved ($211/7 = 30$). It should be noted however 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 is identified for the Plan period for these Centres.

With seven years of the Plan elapsed 86 affordable dwellings have been completed. The target for the Centres overall has been achieved but it should 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 are expected to deliver 57 affordable housing units towards the overall target (19 affordable units are expected to be provided on this application site). Contributions from windfall sites will also be of benefit to meet the needs of the local community.

Viability Revisited: The last time that viability was considered for this site was when the site was considered through the Local Development Plan Examination.

No further viability information has been necessary as the proposal is compliant with the affordable housing requirement set out in Policy 47 Housing Allocations or Land with Planning Permission.

In terms of the planning application proposed the part of the development that has the potential to have a significantly higher prevalence of holiday and second homes is the open market apartments/flats.









19 no.	1 and 2 bed	apartments	In blocks of 4 and 5. And a stand-alone 2 bed apartment	33-51
--------	-------------	------------	--	-------

As advised earlier 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.














As outlined above, there is not considered sufficient justification from evidence to apply a condition to the estate houses proposed within the development. There is however considered evidence to warrant application of a condition to the apartment style properties, given the high prevalence of use of such style properties as second homes and holiday lets in Saundersfoot.

In this instance that would mean that 71% of the 19 apartments – 13 apartments - should be condition as C3 use (principal dwelling) only.

Site Legend:

-  - Indicates Rear Gardens
-  - Indicates Front Gardens
-  - Indicates 2.0m Wide Perimeter Ecological Buffer
-  - Indicates SUDS Infiltration Features. TBC by Engineer.
-  - Indicates Public Open Space (min 400m2) 'POS'
-  - Indicates Retaining walls. TBC by Engineer.
-  - Indicates Patio Areas
-  - Indicates Air Source Heat Pump locations

House Type Mix

-  2 x 2P1B Semi-Detached Bungalow, affordable Units - Plots 14 & 15
-  2 x 2P1B Detached Flats, affordable Units - Plots 31 & 32
-  1 x 3P2B Detached Bungalow, affordable Units - Plot 16
-  6 x 4P2B Semi Detached House, affordable Units - Plots 19 -24
-  2 x 5P3B Semi Detached House, affordable Units- Plots 17 & 18
-  6 x 2P1B 3 Story Flats affordable Units - Plots 25 - 30
-  19 x 1 & 2 Bedroom Apartments, private units - Plots 33 - 51
-  4 x HT B v1 3 Bedroom Semi Detached House, private units - Plots 5 & 6 and 7 & 8
-  4 x HT B v2 3 Bedroom Semi Detached House, private units - Plots 3 & 4 and 9 & 10
-  3 x HT C v1 3 Bedroom Detached Bungalow, private units - Plots 52, 53 and 54
-  2 x HT C v2 3 Bedroom Detached Bungalow, private units - Plots 12 and 13
-  1 x HT E v2 4 Bedroom Detached House, private unit - Plot 1
-  2 x HT E v3 4 Bedroom Detached House, private units - Plots 2 and 11

Total No. Affordable Units = 19 Units**Total No. Market Sale = 35 Units****Total = 54 Units****Total No Car Park Spaces = 99**

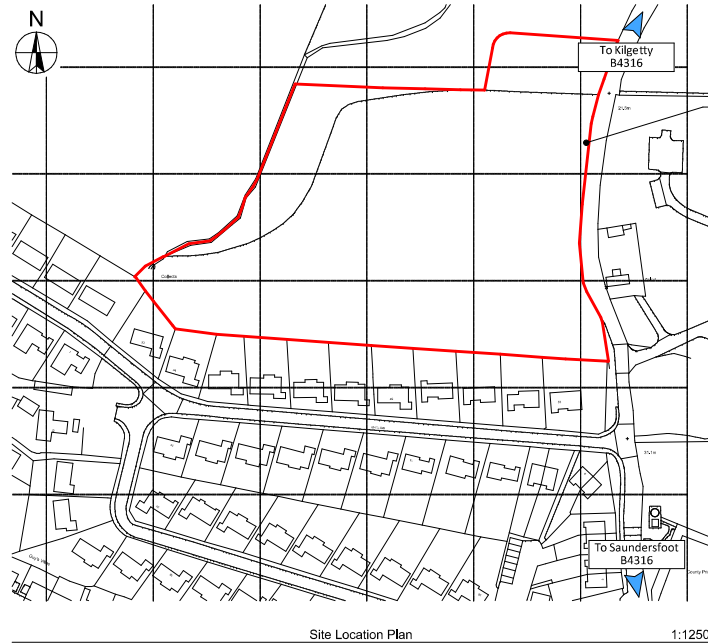
Proposed Site Plan

1:500

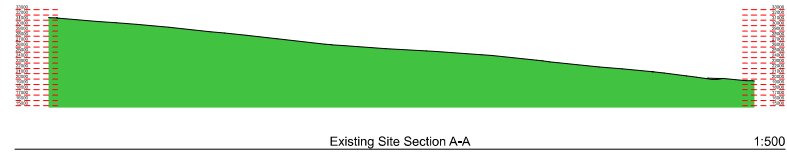
Revision:	Date:	By:
Revision C - General Site Updates	29th July 2022	SE
Revision D - General Site Updates	13th September 2022	SE
Revision E - General Site Updates	16th November 2022	SE
Revision F - General Site Updates	8th December 2022	SE
Revision G - General Site Updates	28th January 2023	SE
Revision H - General updates & Full Planning Issues	16th Mar 2023	SE

- Notes:**
1. To be read in conjunction with 'proposed external house type finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.
 3. To be read in conjunction with landscaping plan by RDS Landscaping.
 4. To be read in conjunction with Ecology Report by Kite Ecology
 5. For highway, footpaths, shared surfaces & parking bay finishes to be read in conjunction with engineer's drawings

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

**Legend:**

— Indicates Application Site Boundary



205300 N

205250 N

Ordnance Survey, (c) Crown Copyright 2021. All rights reserved. Licence number 100022432

Topographical Survey

1:500

Revisions:	Date:	By:	Notes:
Revision A - Red Boundary Line Updated	29th July 2022	SE	
Revision B - General Site Updates	9th January 2023	SE	
Revision C - Full Planning Issue	16th March 2023	SE	



Client:
Morgan Construction Wales Ltd

Date: 11th 22
10:00 AM / RH

Scale: Noted

Drawing Title:
Survey drawings
Topographic Site Plan &
OS Map Location Plan

Proposed Development, Land North of Whitlow,
Saundersfoot, SA69 9AE

Page 110 of 170

R548 S-01 C



Material Finishes

● Riven Edgemere Interlocking Slates, Colour: Blue/Black; with black angled ridge tiles to match

■ Sand/Cement Render, Colour: Polar White.
Note: Render finishes to be either textured or smooth

Cladding Finishes (Refer to specific house type drawings)

- New stone facing wall, colour: natural. Render band surrounding window to match render colour
- Fibre Cement Cladding, colour: Grey

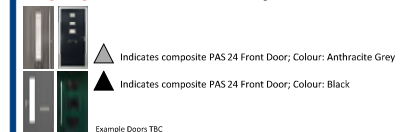
General Notes:

- New half round, Upvc gutters, colour: black
- New half round, Upvc downpipes, colour: black
- New Upvc fascia and barge boards, colour: anthracite grey
- New Upvc windows; colour: anthracite grey, concrete sills, colour: Natural
- New external composite, PAS 24 front door; colours: black and anthracite grey
- New external composite, PAS 24 back door; colours: anthracite grey

□ Indicates 1.8m High Hit & Miss Boundary Fence.

/// Indicates Post & Rail Fencing

○ Indicates Galvanised Metal Railing.



Example Doors TBC

Revision:	Date:	By:	Notes:
Revision 1 - General updates & Full Planning Issue	10th Mar 2023	4	

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ALL DIMENSIONS ARE GIVEN IN METERS, DO NOT SCALE THE DRAWING.

REVISION:

No.	DATE	DESCRIPTION
01.	09.08.2023	U d P Ec R c m d

LEGEND:

- (1) Bat Roosts
- (2) Bird Nests
- (3) Hedgehog friendly fencing
- (4) Insect Hotel
- (5) New Wild Meadow/Grassland (POS)
- (6) New amenity turf to POS
- (7) New specimen tree planting
- (8) New fruit tree planting
- (9) New native hedge planting
- (10) New Rain gardens and SuDs basin
- (11) Himalayan balsam
- (12) New block paving to parking bays
- (13) New retaining walls
- (14) Proposed Ecological Buffer Zone
- (15) Existing trees to be retained
- (16) Existing trees to be removed
- (17) Existing hedgerow to be retained
- (18) Existing hedgerow to be removed
- (19) Development boundary

PROJECT:

N H u D m
L d N r W
S u d r
P m b r r
SA69 9AE

DESCRIPTION:

L d c & Ec c
E c m P

CLIENT:



DRAWN BY:

RDS

CHECKED BY:

.....

SCALE:

1 500 (A2)

DATE:

23/03/2023



View 1

NTS



View 4

NTS



View 6

NTS



View 2

NTS



Map Key

1:750



View 7

NTS



View 3

NTS



View 5

NTS



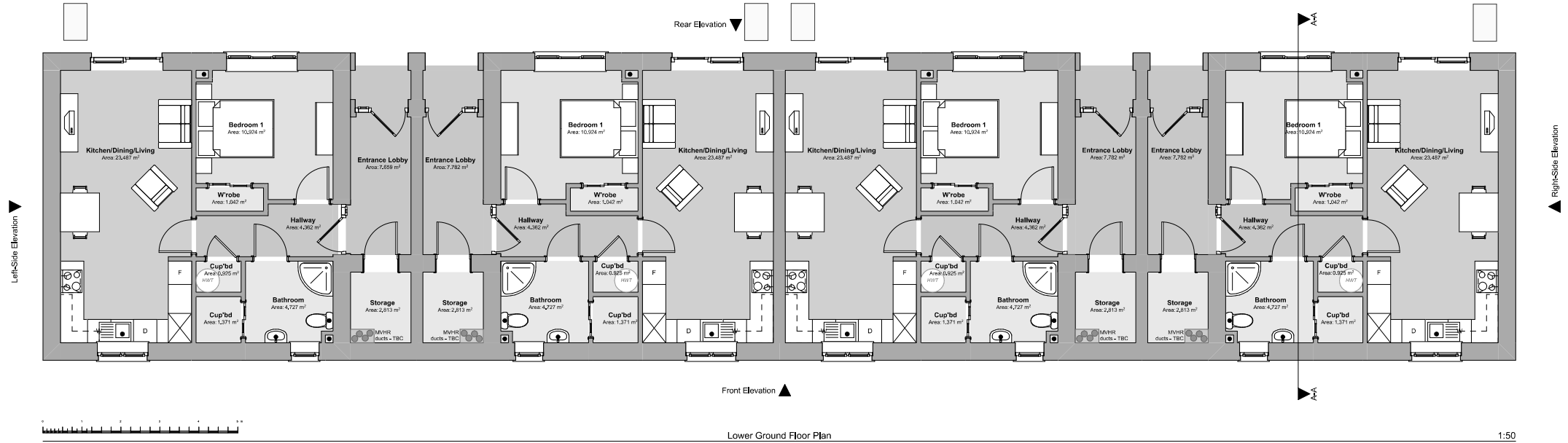
View 8

NTS

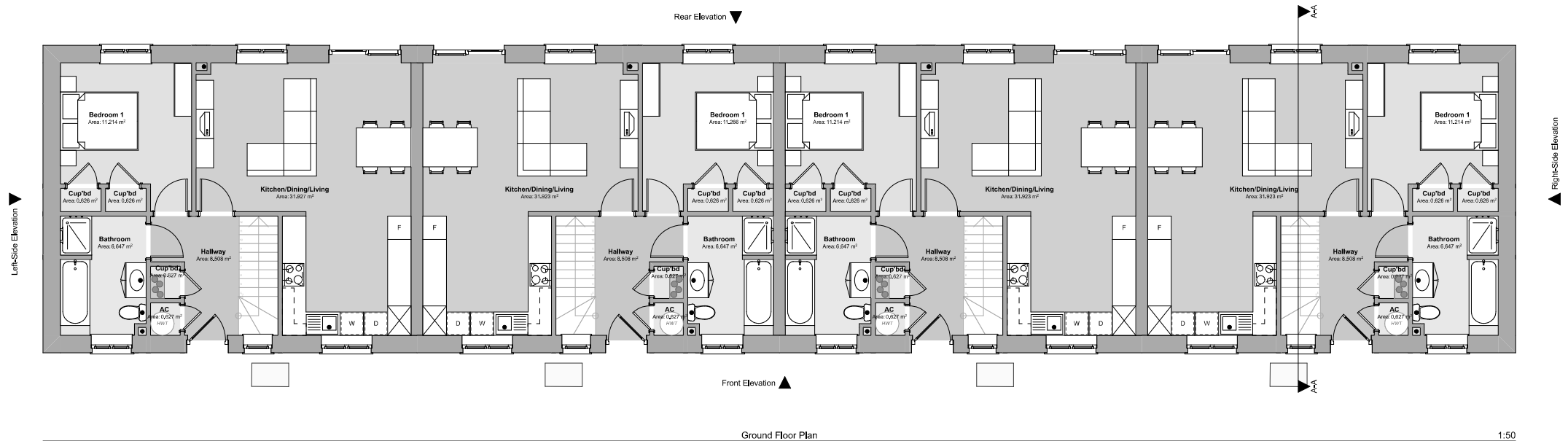
Revision:	Date:	By:	Notes:
Revision A - General updates	20th Feb 2023	SE	
Revision B - General updates & Full Planning Issue	16th Mar 2023	SE	

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

"Planning Drawings" - 1 & 2 Bedroom Apartment (Block of 4)



Floor Areas: 1 Bed Apartment
 Total Gross Internal Lower Floor Area = 60.600m² (527.432sqft)
 Total Gross Internal Area = 60.600m² (652.293sqft)



Revision:	Date:	By:	Notes:
REV A - Minor layout changes	29 November 2022	SE	1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
REV B - General Updates	2nd Feb 2023	SE	2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.
REV C - General Updates & Full Planning Issue	16th Mar 2023	SE	

1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.

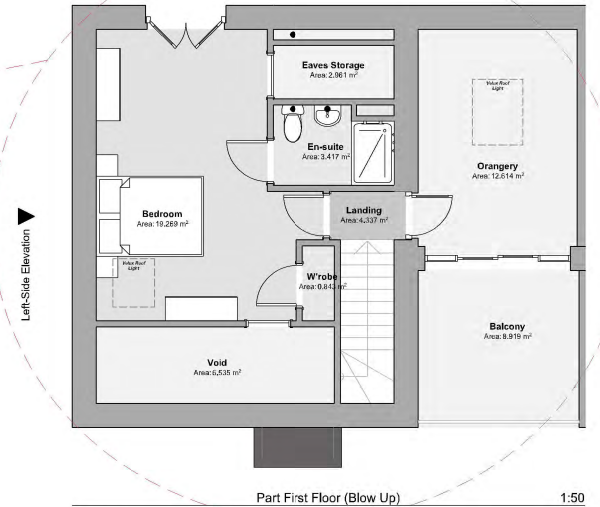
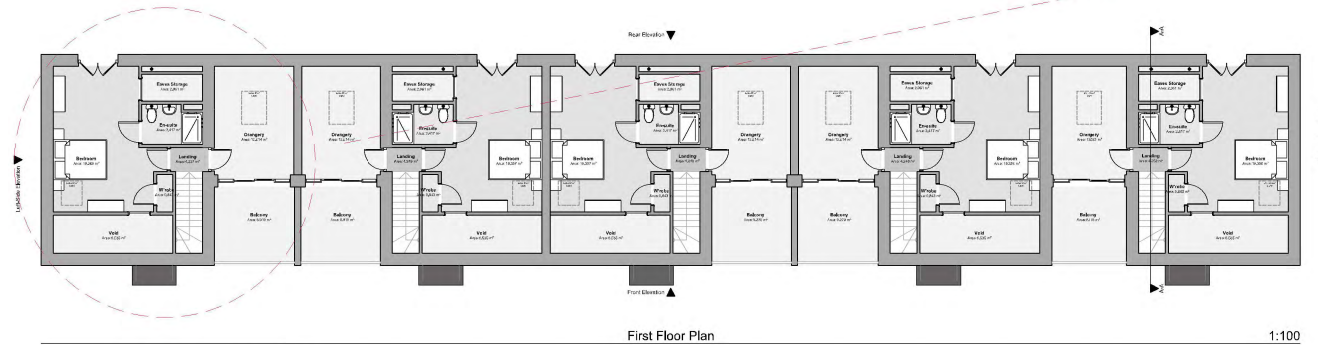


Client: Morgan Construction Wates Ltd	Scale: Noted Date: 17th 22 1:50 (R/H)	Drawing Title: Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE
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 Page 116 of 170
 R548-P-10-C

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

"Planning Drawings" - 1 & 2 Bedroom Apartment (Block of 5)



Floor Areas: 2 Bed Apartment

Total Gross Internal Ground Floor Area = 63.000m² (678.126sqft)
 Total Gross Internal First Floor Area = 52.968m² (570.142sqft)
 Total Gross Internal Area = 115.968m² (1,248.268sqft)

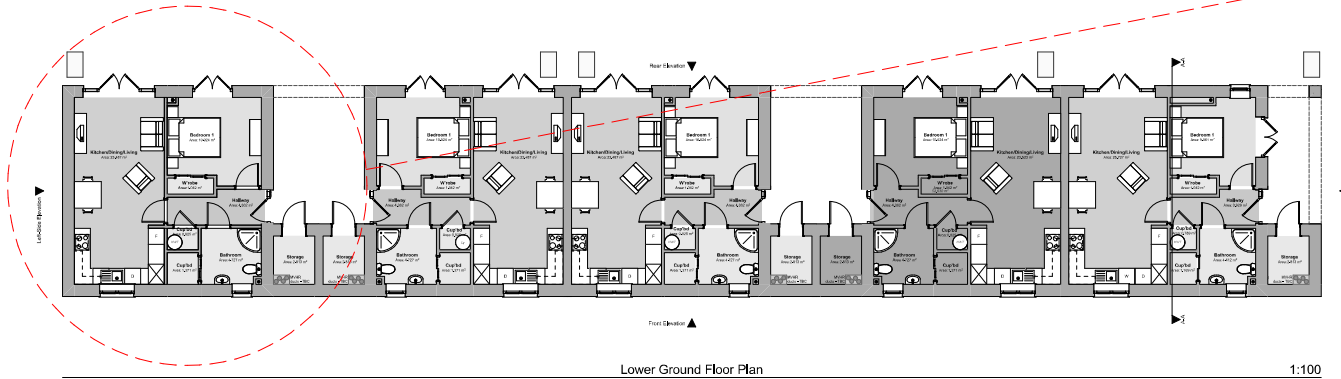


Revisions:	Date:	By:
REV A - minor layout changes	29 November 2022	SE
REV B - General Updates	2nd Feb 2023	SE
REV C - General Updates & Full Planning Issue	16th Mar 2023	SE

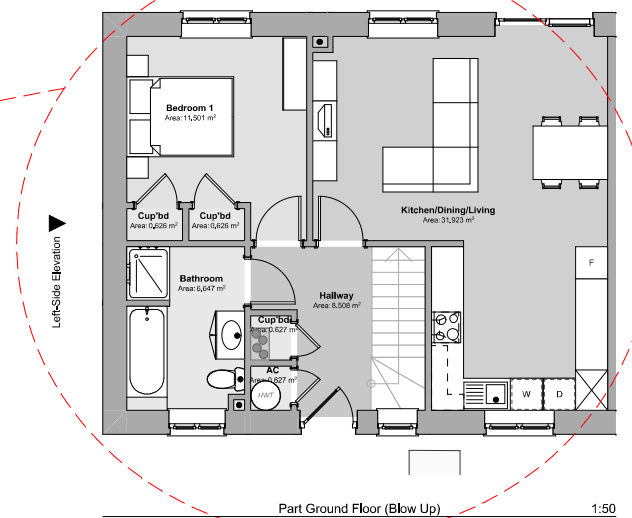
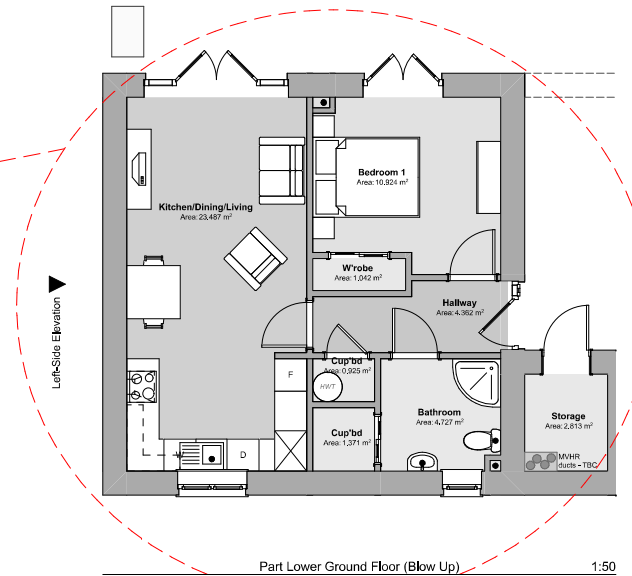
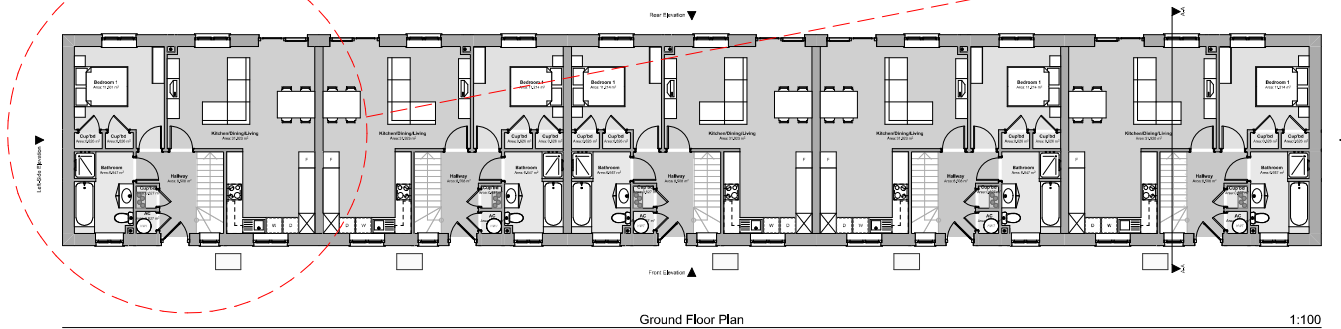
Notes:
 1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

"Planning Drawings" - 1 & 2 Bedroom Apartment (Block of 5)



Floor Areas: 1 Bed Apartment

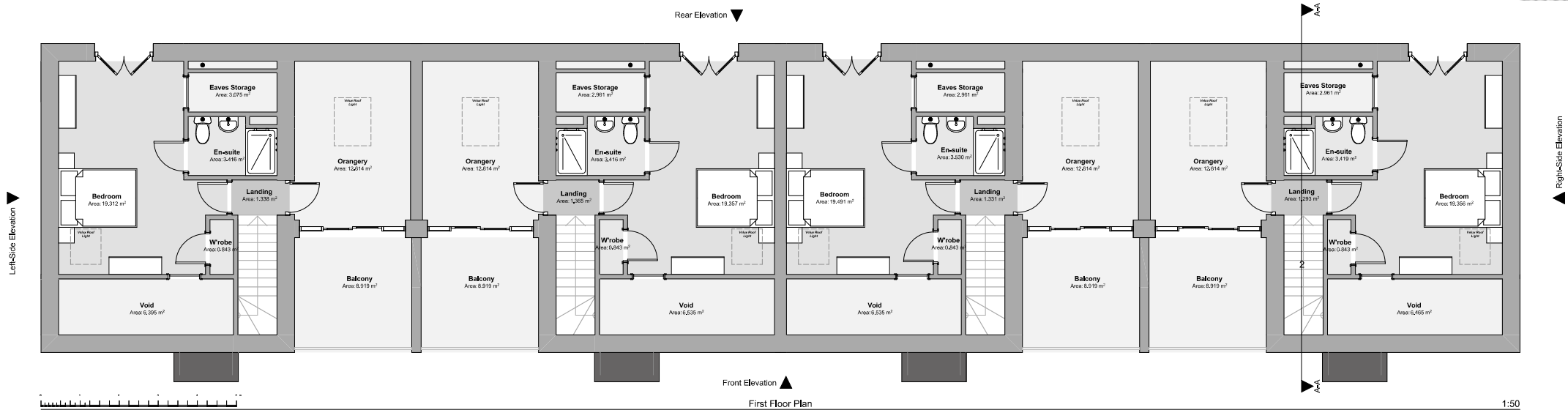
Total Gross Internal Lower Floor Area = 52.630m² (566.504sqft)Total Gross Internal Area = 52.630m² (566.504sqft)

Revision:	Date:	By:	Notes:
REV A - Minor layout changes	29 November 2022	SE	
REV B - General Updates	2nd Feb 2023	SE	
REV C - General Updates & Full Planning Issue	16th Mar 2023	SE	

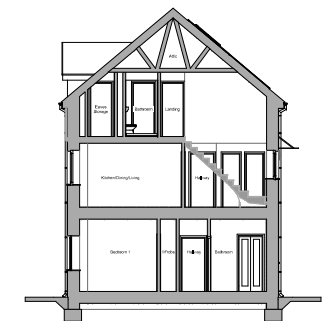
1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

"Planning Drawings" - 1 & 2 Bedroom Apartment (Block of 4)



Floor Areas: 2 Bed Apartment
 Total Gross Internal Ground Floor Area = 63.000m² (678.126sqft)
 Total Gross Internal First Floor Area = 52.968m² (570.142sqft)
 Total Gross Internal Area = 115.968m² (1,248.268sqft)



Revision:	Date:	By:	Notes:
REV A - Minor layout changes	29 November 2022	SE	1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
REV B - General Updates	2nd Feb 2023	SE	2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.
REV C - General Updates & Full Planning Issue	16th Mar 2023	SE	

1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.



Client: Morgan Construction Wales Ltd
 Date: 17th 22
 Scale: Noted
 Drawing Title: Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE
 Drawing No: R548-P-11-C

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

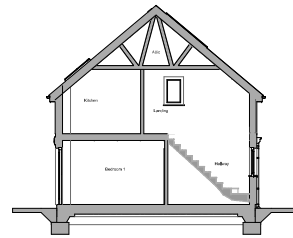
"Planning Drawings" - 2 Bedroom House



Front Elevation 1:100



Left-Side Elevation 1:100



Building Section 1:100



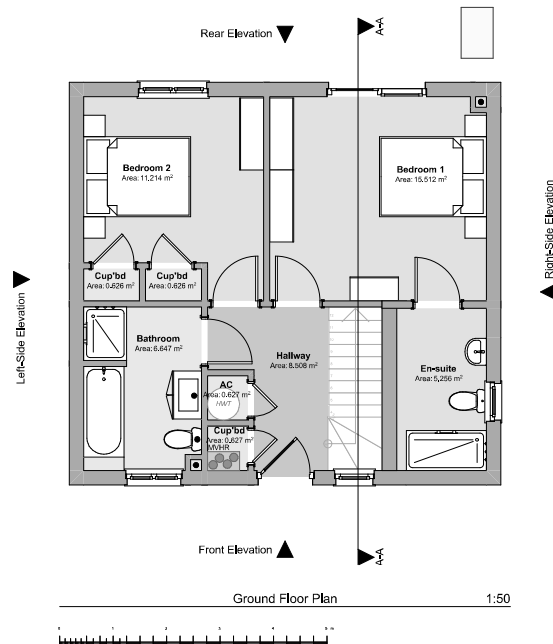
Rear Elevation 1:100



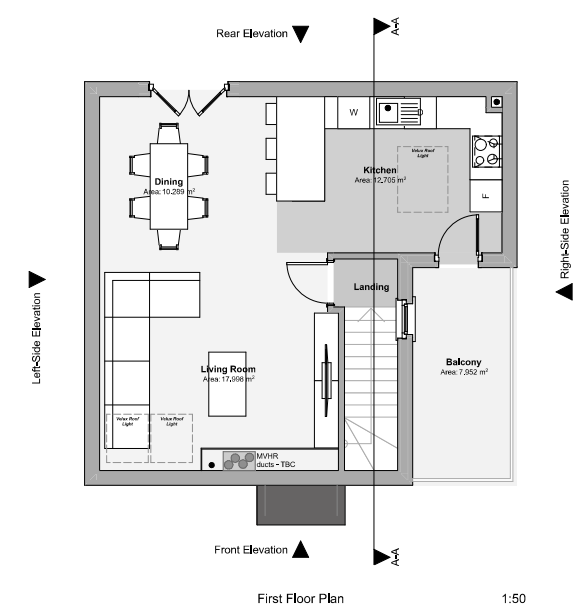
Right-Side Elevation 1:100

Floor Areas:

Total Gross Internal Ground Floor Area = 52.752m² (567.817sqft)
 Total Gross Internal First Floor Area = 44.800m² (482.223sqft)
 Total Gross Internal Area = 97.552m² (1,050.040sqft)

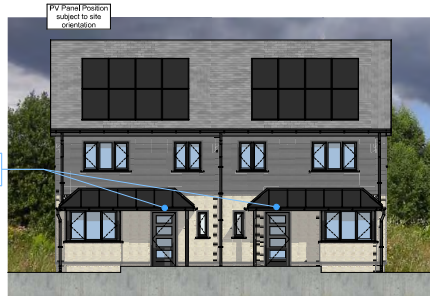


Ground Floor Plan 1:50



First Floor Plan 1:50

Revisions:	Date:	By:	Notes:
REV A - Layout amended to accommodate site changes.	1 October 2022	SE	1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
REV B - General Updates	2nd Feb 2023	SE	2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.
REV C - Full Planning Issue	16th Mar 2023	SE	



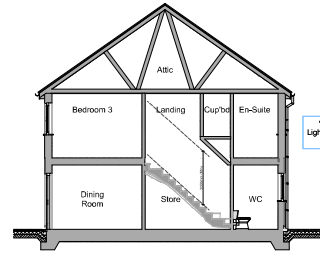
Front Elevation

1:100



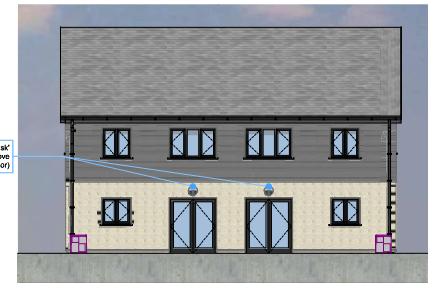
Left-Side Elevation

1:100



Building Section

1:100



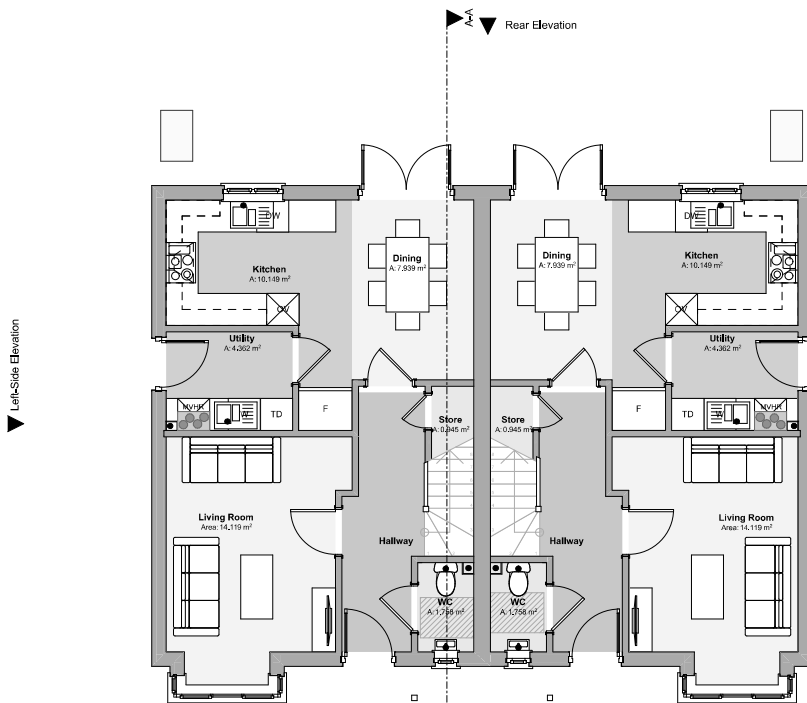
Rear Elevation

1:100



Right-Side Elevation

1:100

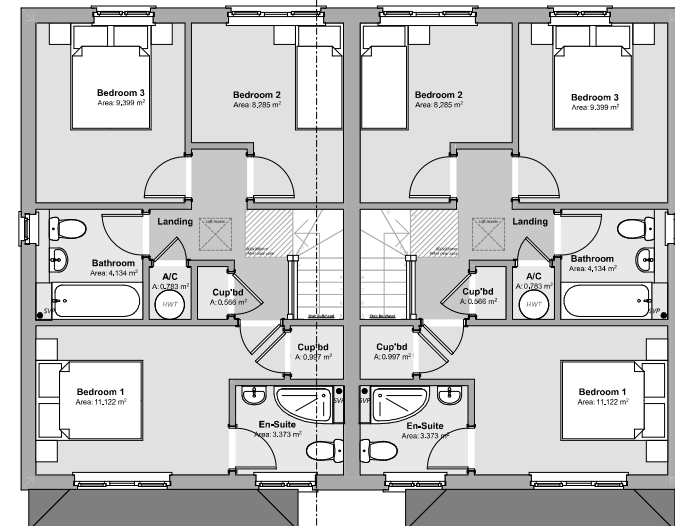


Ground Floor Plan

1:50

Floor Areas:

Total Gross Internal Ground Floor Area = 50,0.34m²
 (538.561sqft)
 Total Gross Internal First Floor Area = 48,031m² (517,001sqft)
 Total Gross Internal Area = 98,065m² (1055.562sqft)



First Floor Plan

1:50

Revision:	Date:	By:	Notes:
REV A - Layout updates following technical design review	29th November '22	SH	
REV B - General Updates	2nd Feb 2023	SE	
REV C - Full Planning Issue	16th Mar 2023	SE	

1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

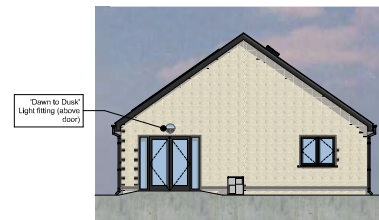
'House Type - C v1 3 Bedroom Detached Bungalow' - As drawn, Plot 52 Mirrored.



Front Elevation 1:100



Left-Side Elevation 1:100

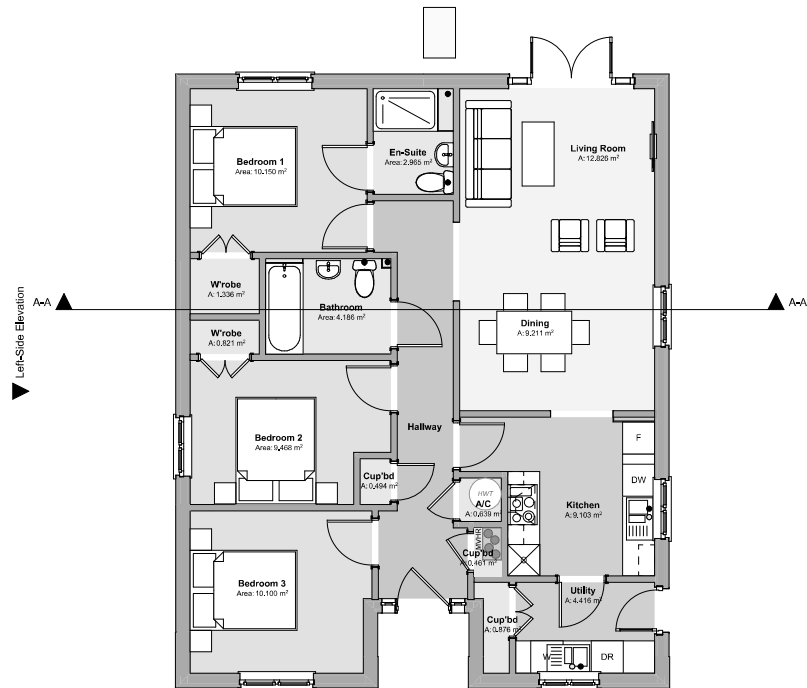


Rear Elevation 1:100



Right-Side Elevation 1:100

Rear Elevation ▼

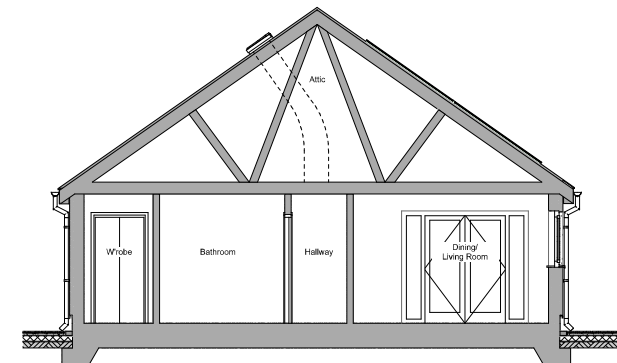


Front Elevation ▲

Ground Floor Plan 1:50

Floor Areas:

Gross Internal Ground Floor Area = 92.038m² (990.688sqft)
 Total Gross Internal Floor Area = 92.038m² (990.688sqft)



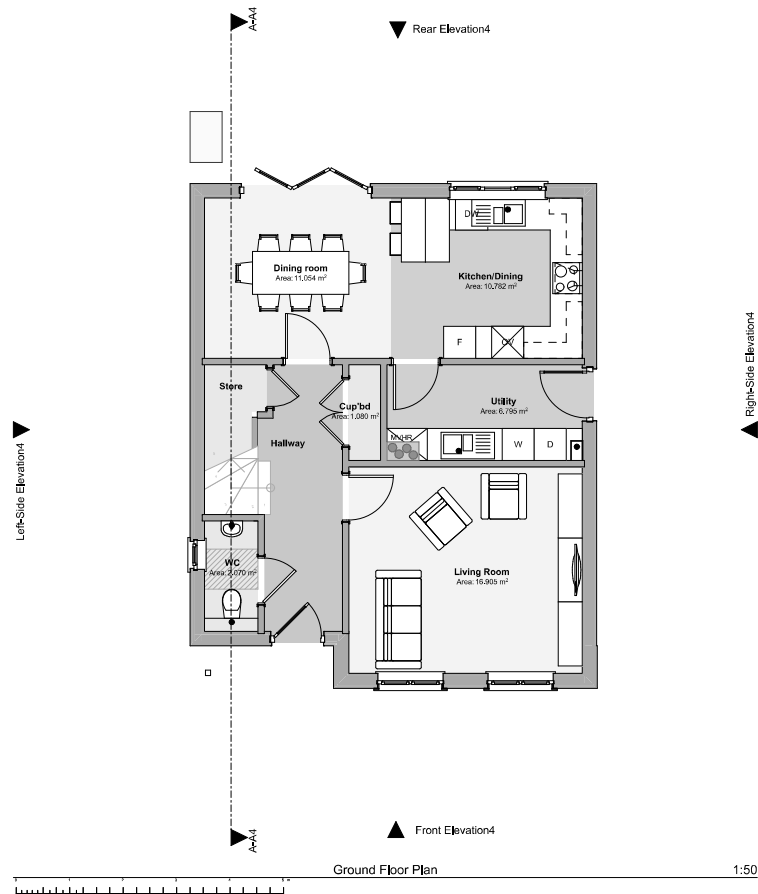
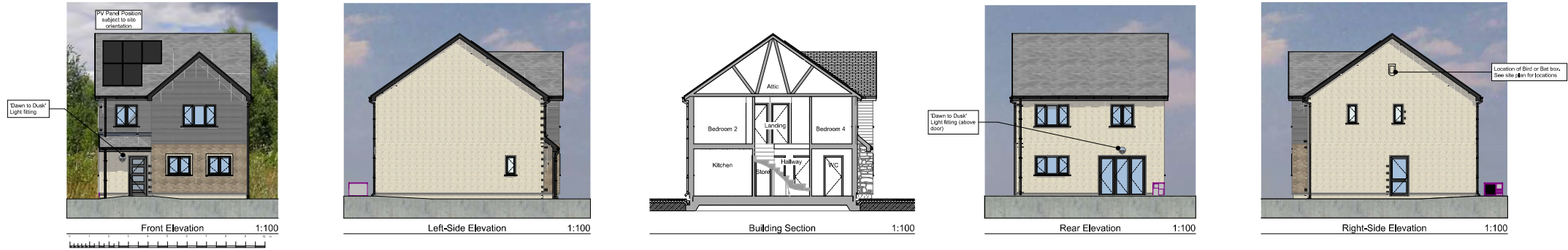
Building Section 1:50

Revisions:	Date:	By:
Rev A - Initial updates following technical design review	29th November '22	RLH
REV B - General Updates	2nd Feb 2023	SE
REV C - Full Planning Issue	16th Mar 2023	SE

Notes:
 1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.

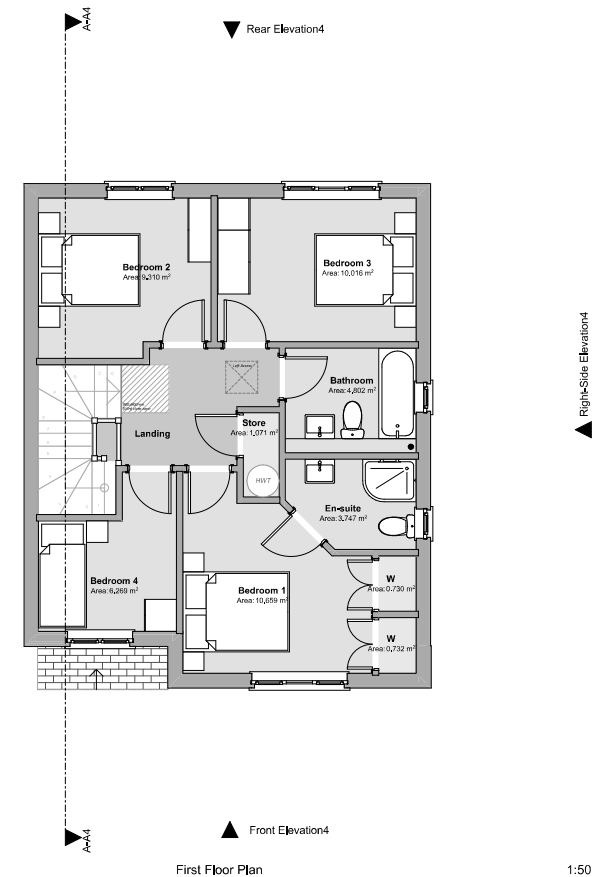
Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

'House Type - E v3' 4 Bedroom Detached House



Floor Areas:

Gross Internal Ground Floor Area = 60.828m² (654.747sqft)
 Gross Internal First Floor Area = 60.828m² (654.747sqft)
 Total Gross Internal Floor Area = 121.656m² (1309.494sqft)

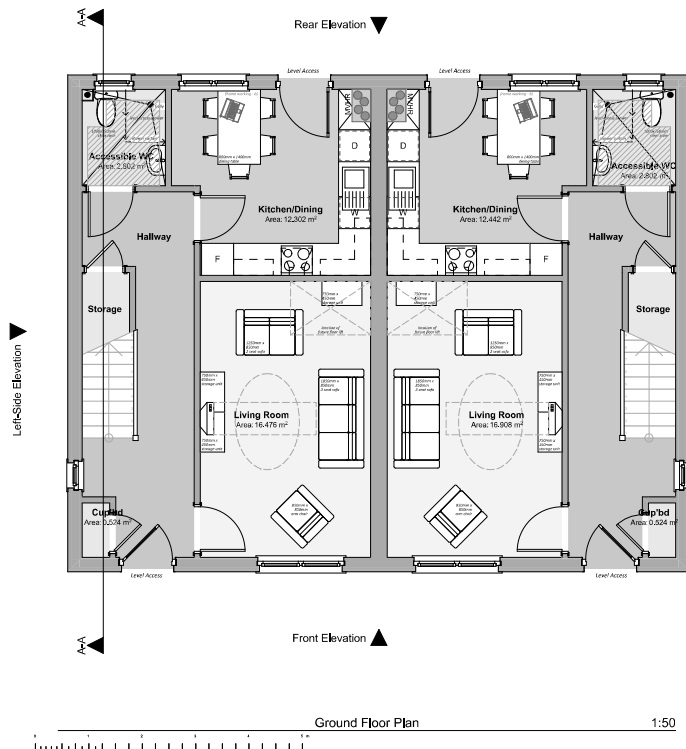
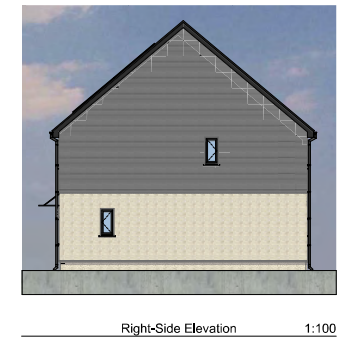
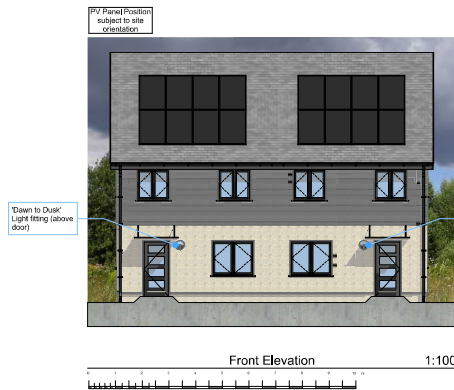


Revisions:	Date:	By:	Notes:
REV A - Initial updates following technical design review	29th November '22	SR	
REV B - General Updates	2nd Feb 2023	SE	
REV C - Full Planning Issue	16th Mar 2023	SE	

1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.

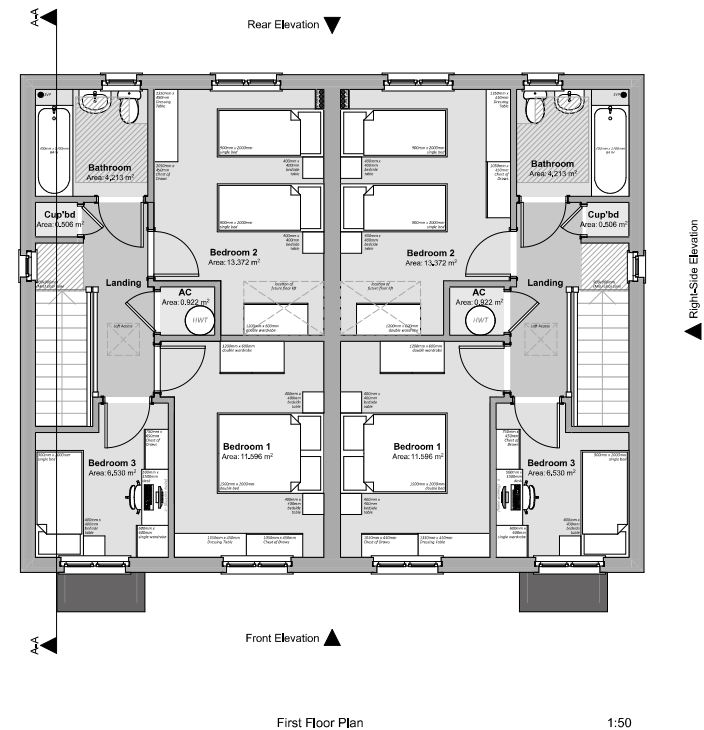
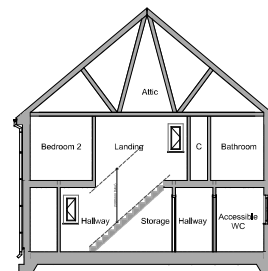
Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

"Planning Drawings" - 5P3B Semi-Detached Affordable House



Floor Areas:
 Total Gross Internal Ground Floor Area = 47.329m² (509.445sqft)
 Total Gross Internal First Floor Area = 47.329m² (509.445sqft)
 Total Gross Internal Area = 94.780m² (1020.203sqft)

Storage Areas:
 [Required Storage Space = 2.5m³]
 Ground Floor Storage Area = 1.63m³
 First Floor Storage Area = 0.97m³
 Total Dwelling Storage Area = 2.60m³

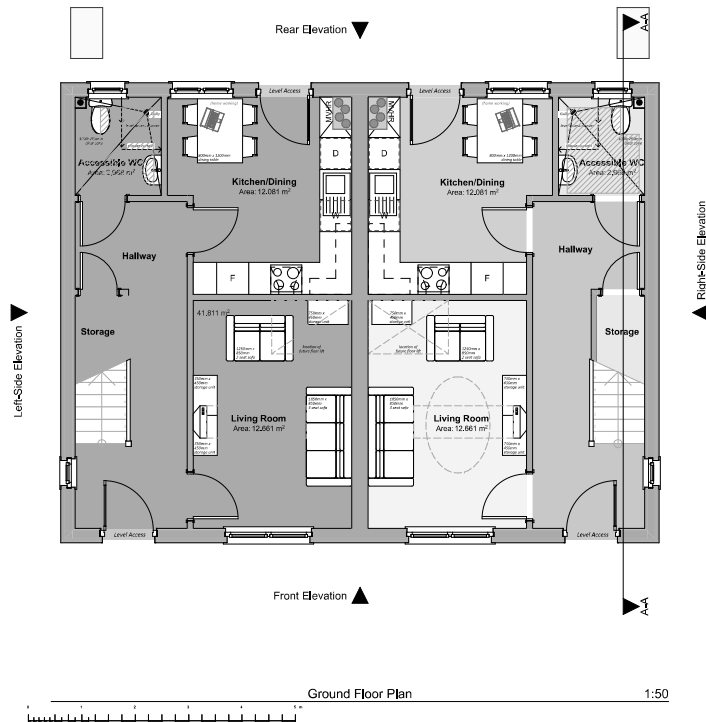
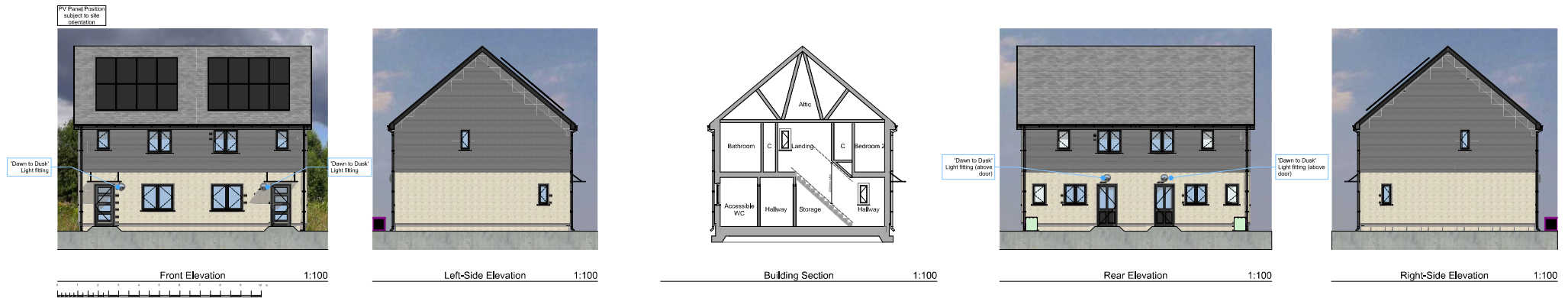


Revision:	Date:	By:
REV A - General Updates	2nd Feb 2023	SE
REV B - Full Planning Issue	16th Mar 2023	SE

Notes:
 1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

"Planning Drawings" - 4P2B Semi-Detached Affordable House - AFH

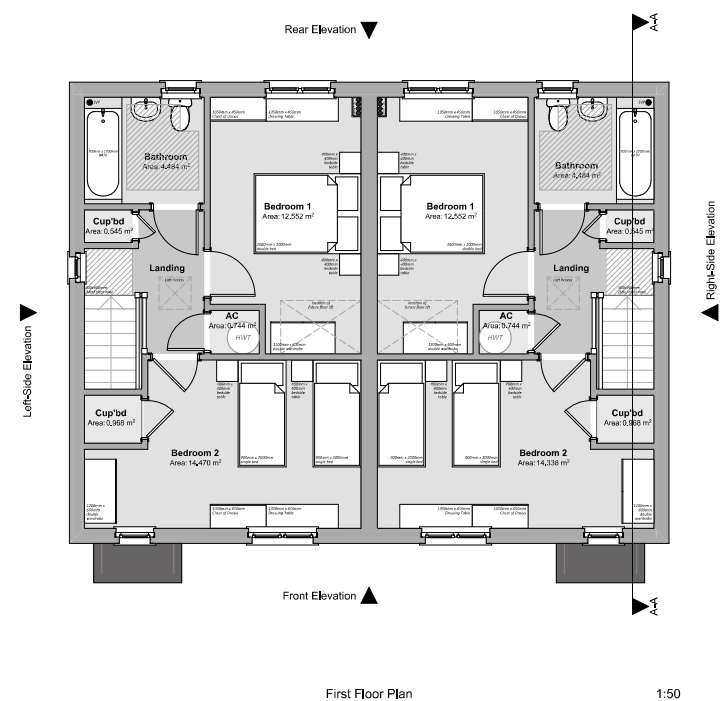


Floor Areas:

Total Gross Internal Ground Floor Area = 41.811m² (450.049sqft)
 Total Gross Internal First Floor Area = 41.811m² (450.049sqft)
 Total Gross Internal Area = 83.622m² (900.099sqft)

Storage Areas:

[Required Storage Space = 2.5m²]
 Ground Floor Storage Area = 0.72m²
 First Floor Storage Area = 2.25m²
 Total Dwelling Storage Area = 2.97m²

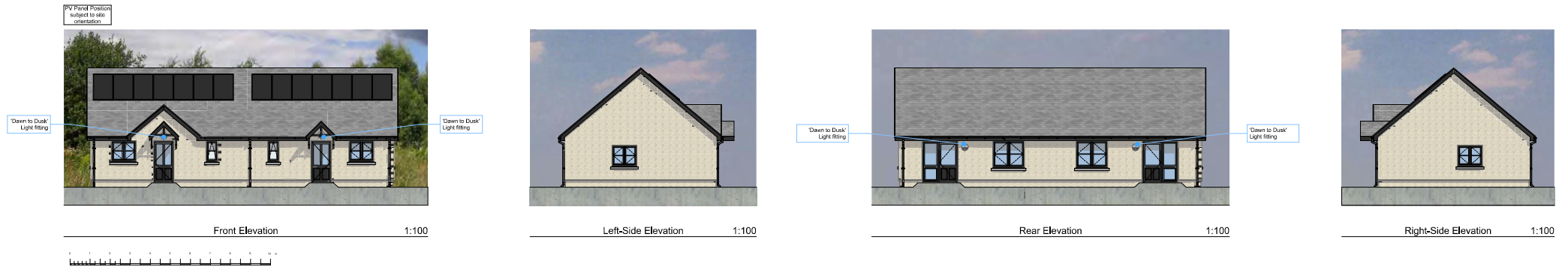


Revision:	Date:	By:
REV A - General Updates	2nd Feb 2023	SE
REV B - Full Planning Issue	16th Mar 2023	SE

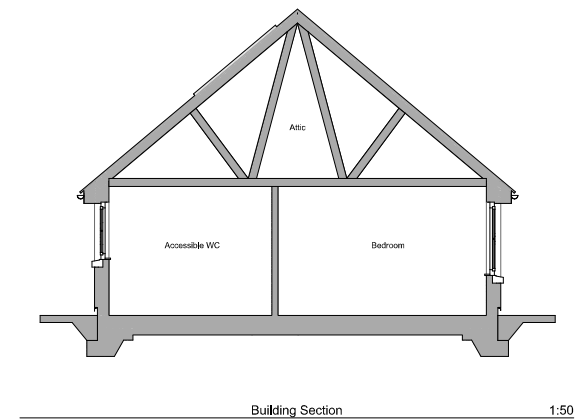
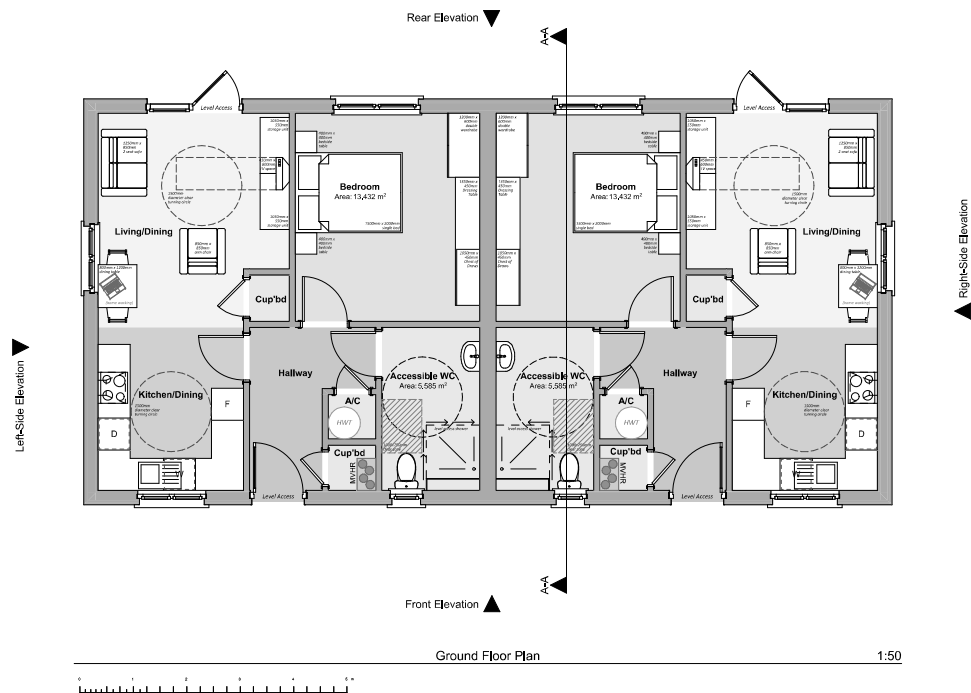
Notes:
 1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

"Planning Drawings" - 2P1B Semi-Detached Affordable Bungalow



Floor Areas:
Total Gross Internal Area = 50.439m ² (542.920sqft)
Storage Areas: (Storage areas highlighted in light green colour)
[Required Storage Space = 1.5m ²]
Total dwelling Storage Area = 1.78m ²



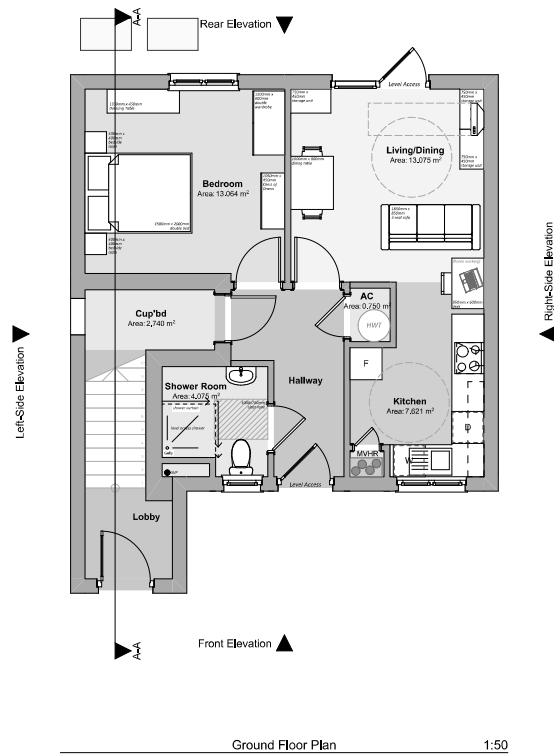
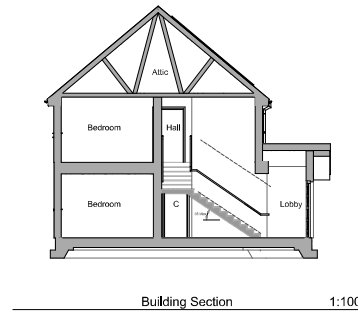
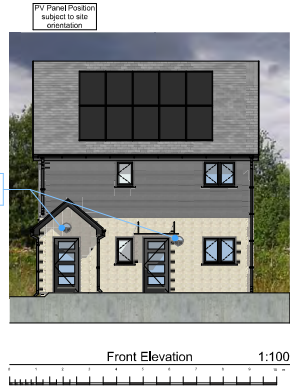
Revision:	Date:	By:
REV A - Full Planning Issue	10th Mar 2023	RL

Notes:

1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.

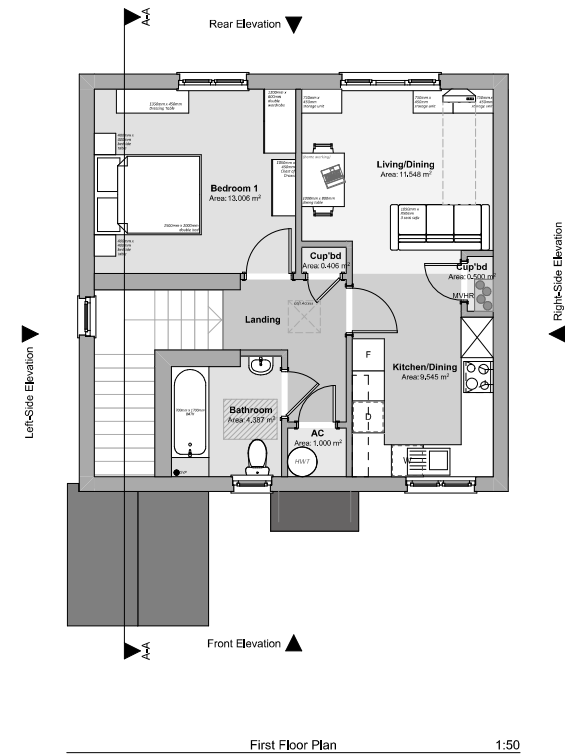
Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

"Planning Drawings" - 2P1B Detached Affordable Flats



Floor Areas: Plots
 Total Gross Internal Ground Floor Areas = 50.789m² (546.688sqft)
 Total Gross Internal First Floor Areas = 56.621m² (609.463sqft)
 Total Gross Average Floor Area = 53.705m² (578.075sqft)

Storage Areas:
 (Storage areas highlighted in light green colour)
 [Ground Floor Flat - Required Storage Space = 1.5m²]
 Ground Floor Storage Area = 3.04m²
 [First Floor Flat - Required Storage Space = 1.5m²]
 First Floor Storage Area = 1.6m²



Revision:	Date:	By:	Notes:
REV A - Incorporated updates to correspond with site plan updates	29th November '22	SE	1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
REV B - General Updates	2nd Feb 2023	SE	2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.
REV C - Full Planning Issue	16th Mar 2023	SE	

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

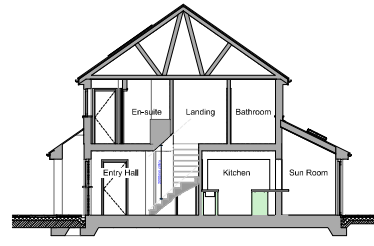
'House Type - E v2' 4 Bedroom Detached House with Single Garage - Plot 1 Only



Front Elevation 1:100



Left-Side Elevation 1:100



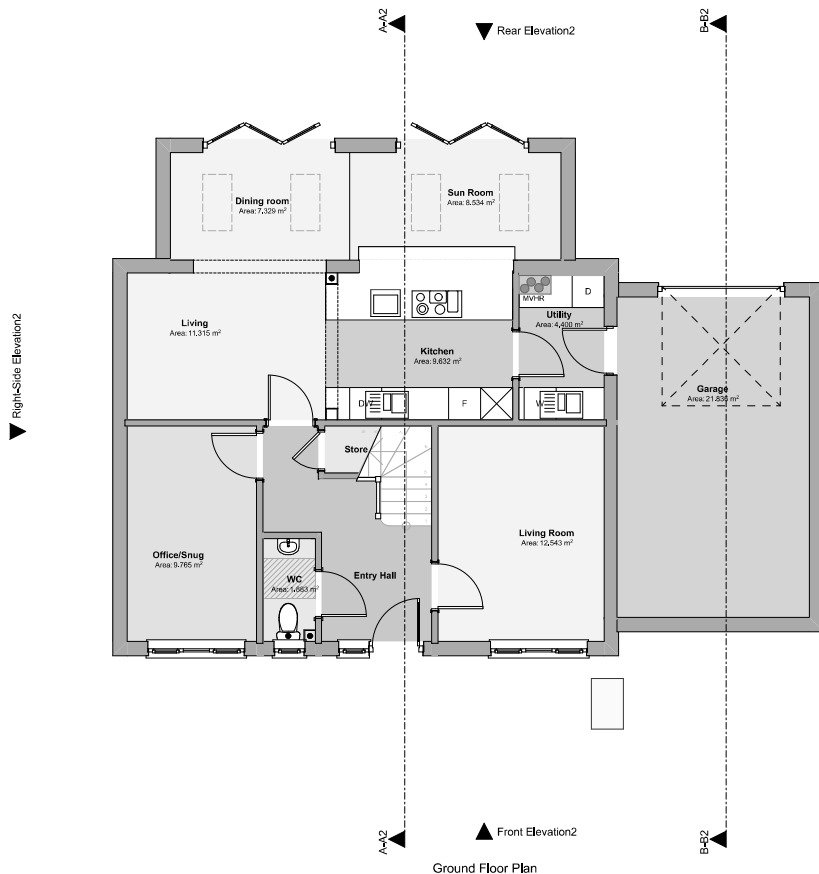
Building Section A-A2 1:100



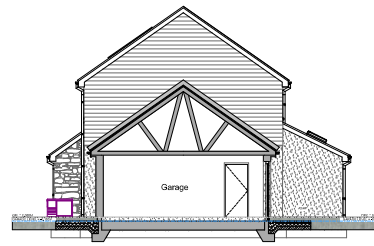
Rear Elevation 1:100



Right-Side Elevation 1:100



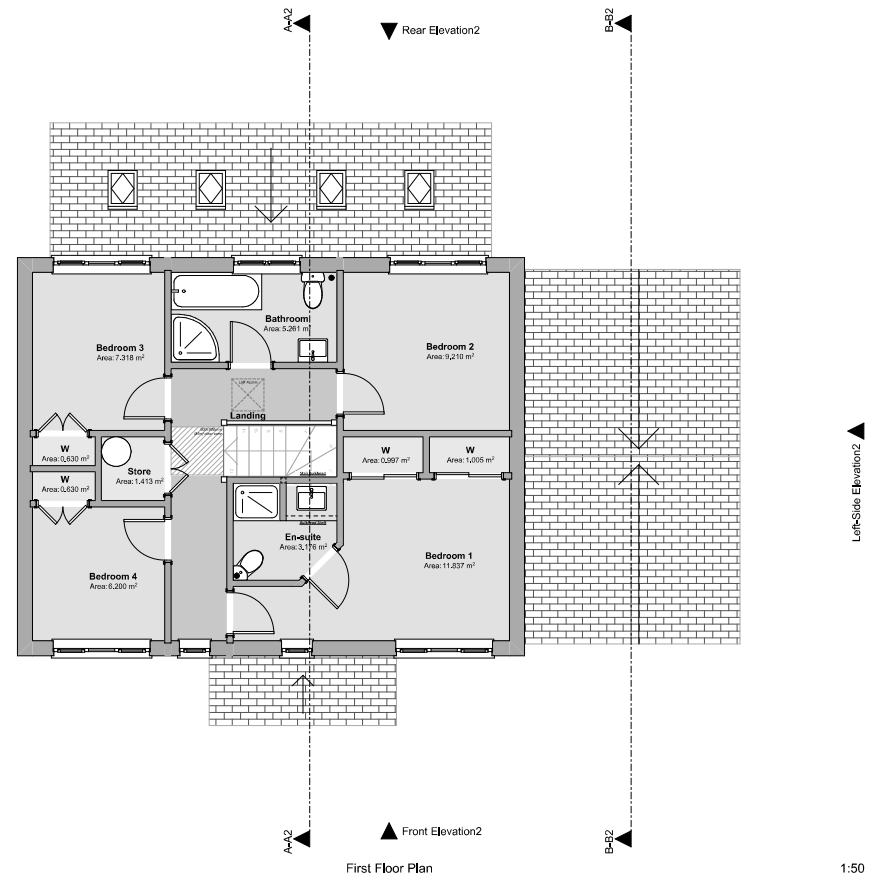
Ground Floor Plan



Building Section B-B2 1:100

Floor Areas:

Gross Internal Ground Floor Area = 78.060m² (840.230sqft)
 Gross Internal First Floor Area = 61.611m² (663.194sqft)
 Total Gross Internal Floor Area = 139.67m² (1503.395sqft)



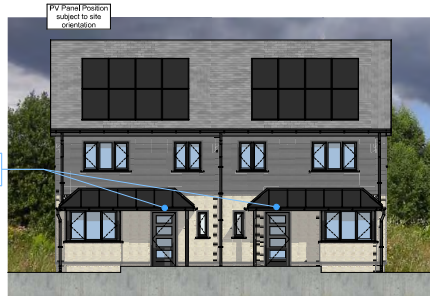
First Floor Plan

Revision:	Date:	By:	Notes:
REV A - Initial updates following technical design review	29th November '22	SR	1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
REV B - General Updates	2nd Feb 2023	SE	2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.
REV C - Full Planning Issue	16th Mar 2023	SE	

1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.



Client: Morgan Construction Wales Ltd	Scale: Noted Date: July '22 By: SR/SE/RH	Drawing Title: PLANNED DEVELOPMENT - H1E V2 Detached House - Floor Plans, Elevations & Section
Drawing Title: Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE		R548-P21-C



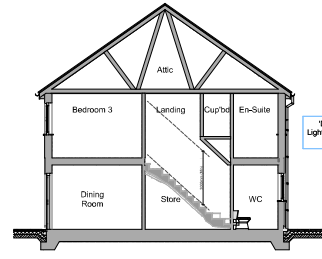
Front Elevation

1:100



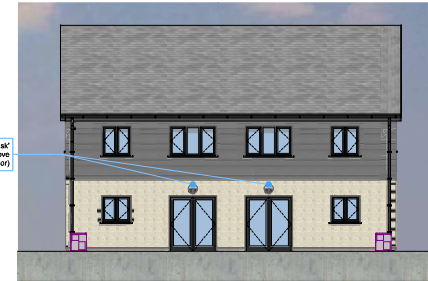
Left-Side Elevation

1:100



Building Section

1:100



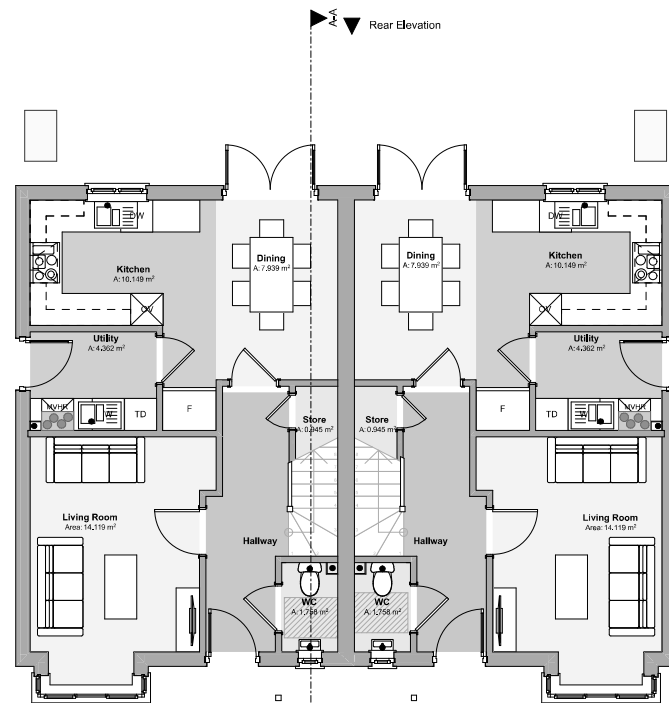
Rear Elevation

1:100



Right-Side Elevation

1:100

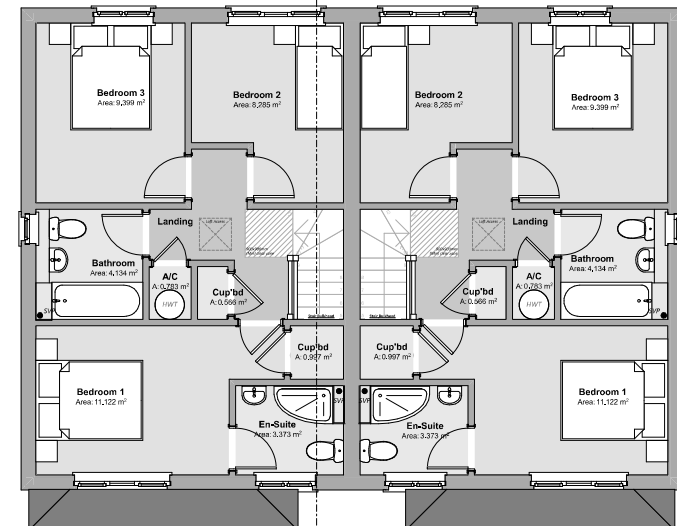


Ground Floor Plan

1:50

Floor Areas:

Total Gross Internal Ground Floor Area = 50,0.34m²
 (538.561sqft)
 Total Gross Internal First Floor Area = 48,031m² (517,001sqft)
 Total Gross Internal Area = 98,065m² (1055.562sqft)



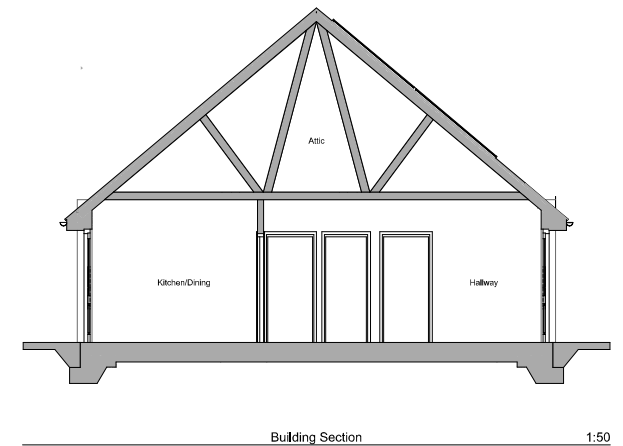
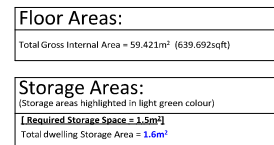
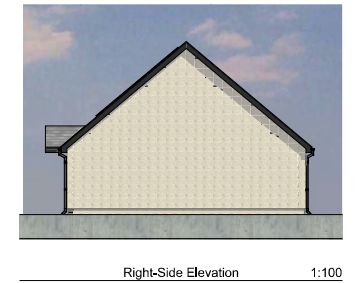
First Floor Plan

1:50

Revision:	Date:	By:	Notes:
REV A - Layout updates following technical design review	29th November '22	SH	
REV B - General Updates	2nd Feb 2023	SE	
REV C - Full Planning Issue	16th Mar 2023	SE	

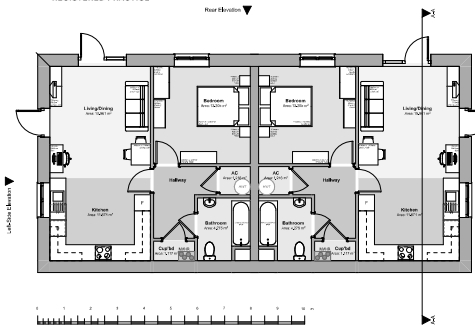
1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.

© RLH Architectural Ltd

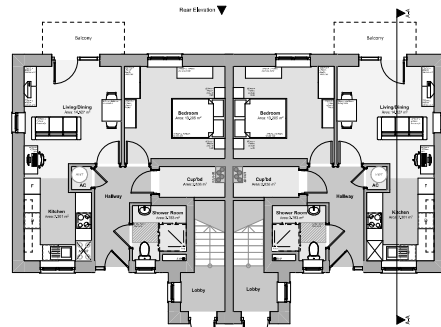


Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

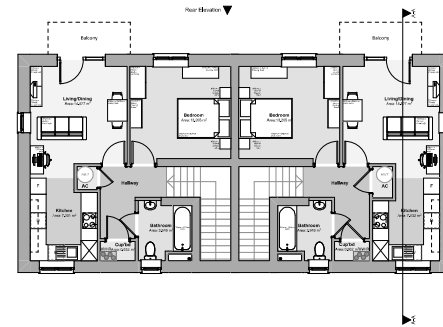
"Planning Drawings" - 2P1B Semi-Detached Affordable Flats (3 Storey)



Lower Ground Floor 1:100



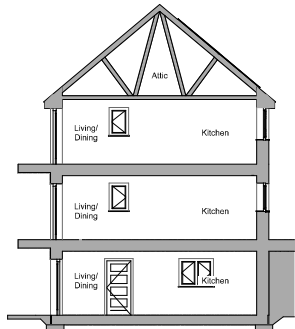
Ground Floor Plan 1:100



First Floor Plan 1:100



Front Elevation 1:100



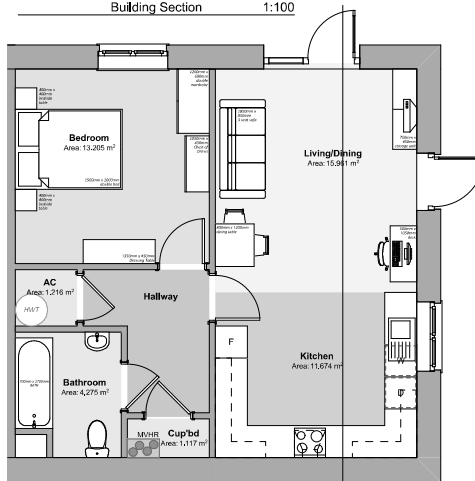
Building Section 1:100

Floor Areas:

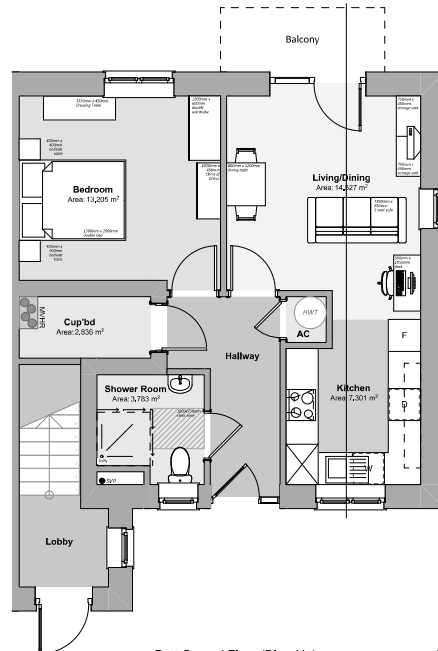
Total Gross Internal Lower Ground Floor Area = 54.67m² (588.463sqft)
 Total Gross Internal Ground Floor Area = 51.23m² (551.327sqft)
 Total Gross Internal First Floor Area = 57.64m² (620.431sqft)
 Total Gross Internal Area = 163.53m² (1760.222sqft)

Storage Areas:

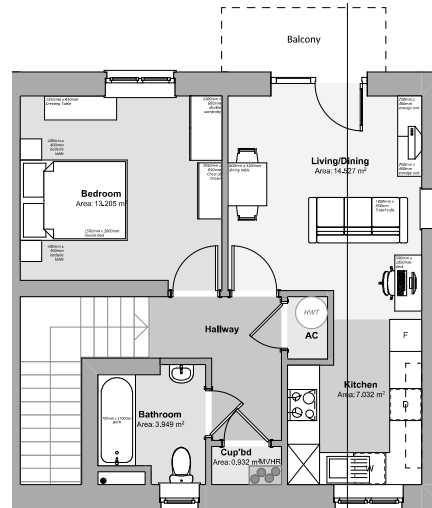
[Required Storage Space = 1.5m²]
 Lower Ground Floor Storage Area = 2.01m²
 Ground Floor Storage Area = 3.11m²
 First Floor Storage Area = 1.50m²



Part Lower Ground Floor (Blow up) 1:50



Part Ground Floor (Blow up) 1:50



Part First Floor (Blow up) 1:50



Right-Side Elevation 1:100



Left-Side Elevation 1:100



Rear Elevation 1:100

Revision:	By:	Date:
REV A - 2018 Initial replacing 2P1B & 3P2B Mock of flats	SE	2nd Feb 2023
REV B - Full Planning Issue	SE	16th Mar 2023

- Notes:**
1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

'House Type - B v2 4 Bedroom Semi Detached House'



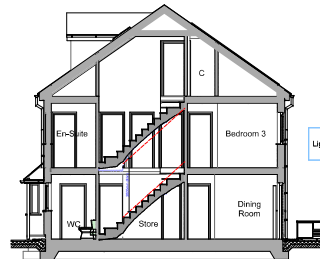
Front Elevation

1:100



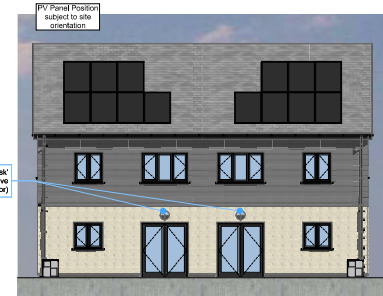
Left-Side Elevation

1:100



Building Section

1:100



Rear Elevation

1:100

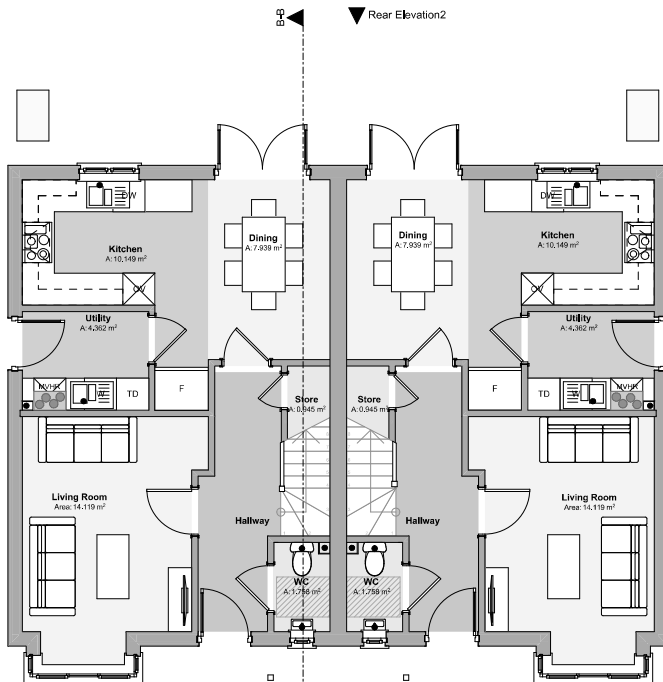


Right-Side Elevation

1:100

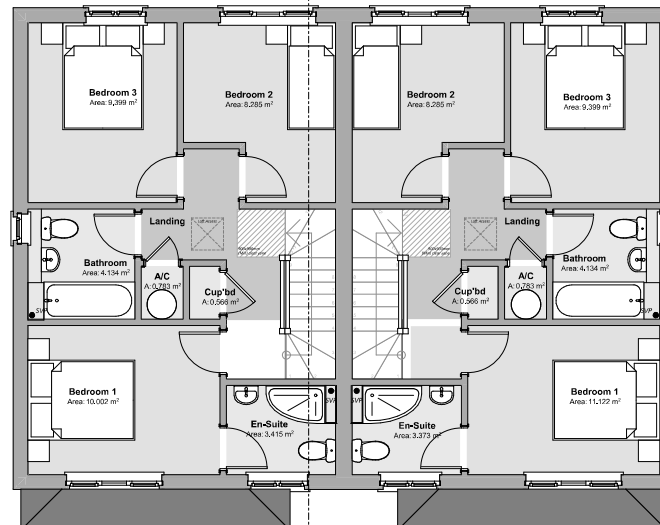
Floor Areas:

Gross Internal Ground Floor Area = 49.78m² (535.82sqft)
 Gross Internal First Floor Area = 48.75m² (524.74sqft)
 Gross Internal Second Floor Area = 23.98m² (258.118sqft)
Total Gross Internal Floor Area = 122.51m² (1318.69sqft)



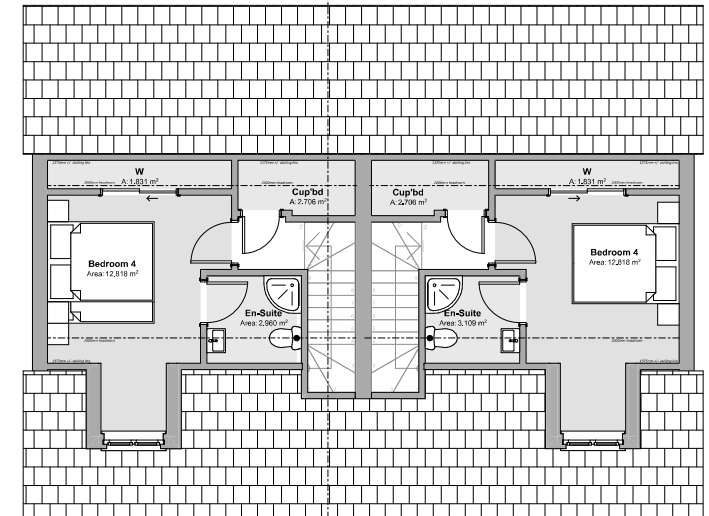
Ground Floor Plan

1:50



First Floor Plan

1:50



Second Floor Plan

1:50

Revision:	Date:	By:
Rev A - Initial updates following technical design review	20th November '22	RLH/MS
REV B - General Updates	2nd Feb 2023	SE
REV C - Full Planning Issue	16th Mar 2023	SE

Notes:
 1. To be read in conjunction with 'proposed house type external finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
 2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.



CIAT
REGISTERED PRACTICE

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE



Product :- UPVC Casement Window
Company:- TBC
Colour:- Anthracite Grey



Product :- Example Composite PAS 24 Front Door
Colour:- Anthracite Grey & Black



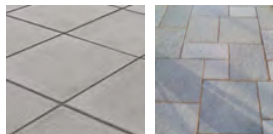
Product :- Horizontal Fibre Cement Cladding.
Colour:- Grey Slate



Product :- Hit & Miss Fencing
Company:- TBC
Colour:- Natural with Concrete Post



Product :- Guttering & Downpipe
Colour:- Black UPVC



Product :- Concrete Paving TBC



Product :- Stone Cladding
Company:- Taylor Maxwell TBC
Colour:- Sahara TBC



Product :- Permeable Block Paving
Company:- Tobermore
Colour:- Bracken, Charcoal & Cedar



Product :- Painted Texture Sand/Cement Render on Render Board
Colour:- Polar White

Revision:	Date:	By:
Revision A - General updates	2nd Feb 2023	SE
Revision B - General updates & Full Planning Issue	16th Mar 2023	SE

Notes:



Client:
Morgan Construction Wales Ltd

Scale: Noted
Date: Jan '22
Drawn: SE/RH

Drawing Title:
PLANNING DRAWINGS -
Proposed House Type
External Finishes Drawing

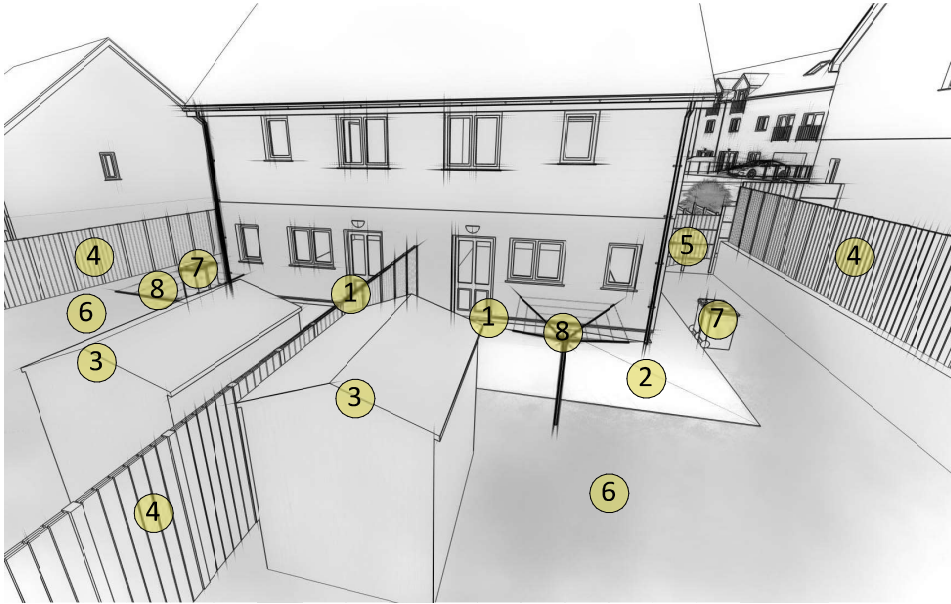
Job Title:
Proposed Development, Land North of
Whitlow, Saundersfoot, SA69 9AE

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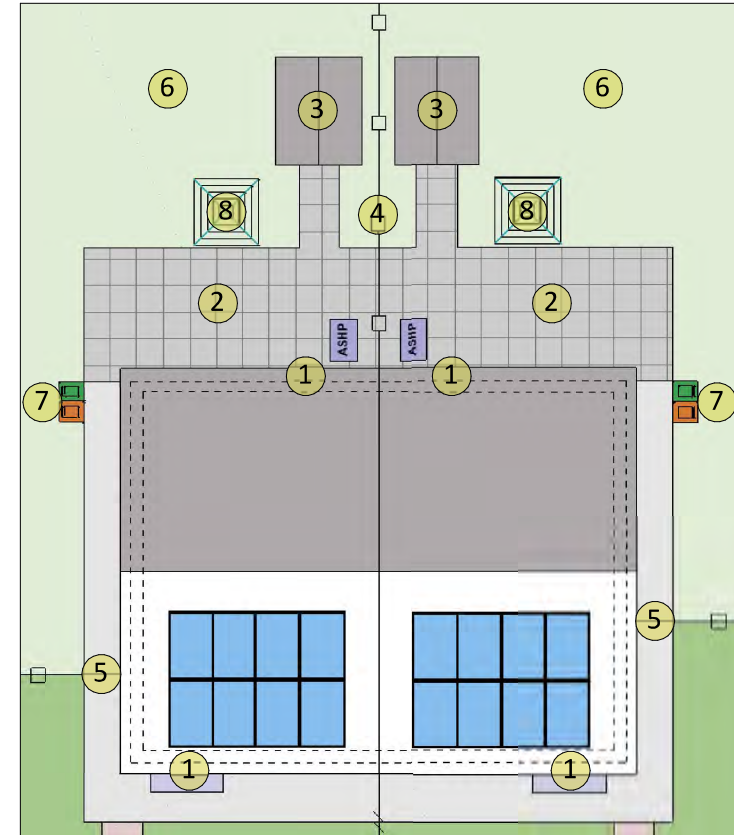
R548 P-08-B

Proposed Development, Land North of Whitlow, Saundersfoot, SA69 9AE

Affordable Units - Plots 14 - 32



1. Level Access
2. 3m x 3m level patio area
3. SBD compliant shed (bike storage, etc.)
4. SBD compliant timber with concrete post fencing
5. Secure/lockable gate access
6. Grass Area (exceed area requirements for houses & bungalows)
7. Bin storage
8. Drying line



Revision:	Date:	By:
Revision A - Full Planning Issue	16th Mar 2023	SE

Notes:
RLH
 architectural

 16 Main Street,
 Fishguard,
 Pembrokeshire,
 SA65 9HJ
 01348 435004/06
 design@rlharchitectural.com
 www.rlharchitectural.com

 Client:
 Morgan Construction Wales Ltd

 Scale: Noted
 Date: Jan '22
 Drawn: SE/RH











 Drawing Title:
 PLANNING DRAWINGS -
 AFH Typical Garden Layout

 Job Title:
 Proposed Development, Land North of
 Whitlow, Saundersfoot, SA69 9AE

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R548 P-27-A

Site Legend:

-  - Indicates Rear Gardens
-  - Indicates Front Gardens
-  - Indicates 2.0m Wide Perimeter Ecological Buffer
-  - Indicates SUDS Infiltration Features. TBC by Engineer.
-  - Indicates Public Open Space (min 400m2) 'POS'
-  - Indicates Retaining walls. TBC by Engineer.
-  - Indicates Patio Areas
-  - Indicates Air Source Heat Pump locations
-  - Indicates Bird box. See Ecologist Report
-  - Indicates Bat box. See Ecologist Report

Note:
For boundary treatment. Refer to R548 P-07
Proposed External House Type Finishes Site Plan

House Type Mix

-  2 x 2P1B Semi-Detached Bungalow, affordable Units - Plots 14 & 15
-  2 x 2P1B Detached Flats, affordable Units - Plots 31 & 32
-  1 x 3P2B Detached Bungalow, affordable Units - Plot 16
-  6 x 4P2B Semi Detached House, affordable Units - Plots 19 - 24
-  2 x 5P3B Semi Detached House, affordable Units- Plots 17 & 18
-  6 x 2P1B 3 Story Flats affordable Units - Plots 25 - 30
-  19 x 1 & 2 Bedroom Apartments, private units - Plots 33 - 51
-  4 x HT B v1 3 Bedroom Semi Detached House, private units - Plots 5 & 6 and 7 & 8
-  4 x HT B v2 3 Bedroom Semi Detached House, private units - Plots 3 & 4 and 9 & 10
-  3 x HT C v1 3 Bedroom Detached Bungalow, private units - Plots 52, 53 and 54
-  2 x HT C v2 3 Bedroom Detached Bungalow, private units - Plots 12 and 13
-  1 x HT E v2 4 Bedroom Detached House, private unit - Plot 1
-  2 x HT E v3 4 Bedroom Detached House, private units - Plots 2 and 11

Total No. Affordable Units = 19 Units**Total No. Market Sale = 35 Units****Total = 54 Units****Total No Car Park Spaces = 99**

1:500

Revision:	Date:	By:
Revision A - Updates to Hedgerow following comments from Ecologist.	9th January 2023	RE
Revision B - General updates & Full Planning Issue	16th Mar 2023	SE

Notes:

1. To be read in conjunction with 'proposed external house type finishes site plan' dwg. no. R548 P-07 for individual plot finishes.
2. To be read in conjunction with 'proposed house type external finishes drawing' dwg. no. R548 P-08.
3. To be read in conjunction with landscaping plan by RDS Landscaping.
4. To be read in conjunction with Ecology Report by Kite Ecology
5. For highway, footpaths, shared surfaces & parking bay finishes to be read in conjunction with engineer's drawings



Client: Morgan Construction Wales Ltd	Scale: Noted Date: 1st 22 DWG: E/RH	Drawing Title: PLANNED DRAWINGS Proposed Block Plan
Page 135 of 170		R548 P-03-B

