



PLANNING STATEMENT

**Residential Development of 41 Apartments
At Former Learning Centre, Dew Street, Haverfordwest,
Pembrokeshire**

**On behalf of
Ateb Group Ltd**

**Our Ref: 1591.b
Date: November 2023
Prepared by: JDE**

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1.0 INTRODUCTION

- 1.1 Evans Banks Planning has been instructed by Ateb Group Limited to submit a full planning application for a Residential Development of 41 apartments (affordable) at and around the former Learning Centre, Dew Street, Haverfordwest. This application follows on from formal pre-application discussions with the local planning authority, with all advice given during that process having been duly considered in the preparation of this planning application.
- 1.2 This Planning Statement therefore forms part of the submissions of the application to be considered by the Authority, and provides information on the following points:
- A brief description of the site and surrounding area
 - A description of the proposed development
 - Consideration of relevant national and local planning policy
- 1.3 This Statement is also accompanied by a wealth of supporting information including a Design and Access Statement, Transport Assessment, Tree Survey Report, a Preliminary Ecological Assessment, a Bat Survey Report, Phase I Preliminary Risk Assessment & Phase II Ground Investigation Interpretative Report, surface water drainage details and a full scheme of drawings.

2.0 SITE DESCRIPTION

2.1 THE SITE

2.1.1 Measuring just over 0.65 hectares, the site (circled in the aerial photograph below) relates to a former Learning Centre with associated parking and circulation areas, located within the existing urban form of the County Town of Haverfordwest.



Photograph 1

2.1.2 As detailed above, the site is presently occupied by an existing building that is largely two storey in nature, of modern construction and has a flat roof, as illustrated below.



Photograph 2

2.1.3 Notwithstanding the above, the building has been vacant now for some years, resulting in its general deterioration and unsuitability for further use.

2.1.4 The core of the site is generally level, with large areas of hardstanding dominating its north, southern and western portions. A wooded bank is positioned along the site's western most boundary, with the boundaries of residential properties positioned just beyond it, as well as along the site's southern and eastern boundaries. The site's remaining northern boundary is then largely open, leading on to further hard standing used for car parking purposes, pictured below.



Photograph 3

2.1.5 As detailed in the accompanying *Preliminary Ecological Appraisal* report, with the exception of the aforementioned wooded bank (which is to remain), the site has very little ecological interest, including the existing buildings currently present on it.

2.1.6 Vehicular access to the site is gained via the aforementioned car park, that then leads past the former library building to the north east (Photograph 4), before then joining Dew Street.



Photograph 4

2.1.7 This point of access also serves pedestrians, with a further point of pedestrian access present from the adjoining Barn Court development positioned to the south west of the site.

2.2 THE SURROUNDING AREA

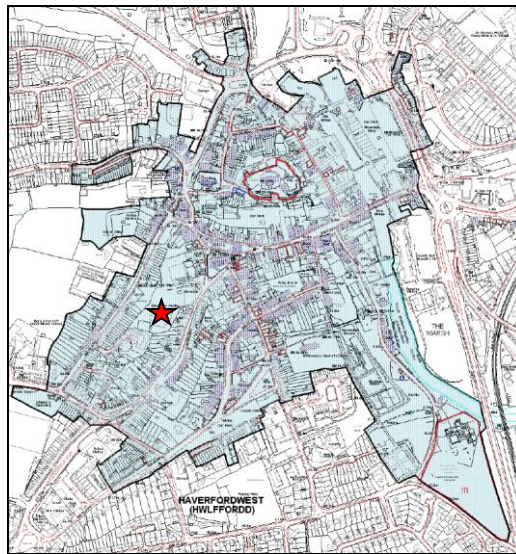
2.2.1 In the immediate sense, the site is adjoined by a mix of uses. To its south east is a housing development (Barn Court) constructed in recent years (Photograph 5), with older stock then located to the west along the A487.



Photograph 5

2.2.2 Further residential development can then be found to the east of the site along Dew Street itself, with a number of properties also having commercial uses at a ground floor level off the street. The final northern boundary of the site then leads on to a further area of car parking.

2.2.3 In the wider sense, as detailed above, the site (indicated by the red star in Plan A) is positioned within the urban form of Haverfordwest and also forms part of its Conservation Area (area shaded blue), as illustrated in the plan below.



Plan A

2.2.4 However, as can be seen from examples of other nearby historic buildings in the Conservation Area shown below, the building present on the site subject of this pre-application enquiry shares little commonality with them in terms of appearance, style or setting.



Photography 6



Photograph 7



Photograph 8

2.2.5 In terms of connectivity, less than 400m to the north east of the site is located the town centre of Haverfordwest with its range of community facilities and local services. At a much shorter distance away however, are bus stops regularly served by a number of services, providing good access to other nearby settlements and areas of the region. The Town also includes a rail station that provides good access to the South Wales region and beyond.

3.0 PRE-APPLICATION STAGE

- 3.1 A pre-application enquiry for the proposed development was submitted to the Authority for consideration on 29th September 2023, assigned Reference No. PR/0306/23 for “*Proposed 41 Affordable Apartments*”, based on the site layout illustrated below:



Plan B

- 3.2 The LPA provided a response to the enquiry on 25th October 2023 and advised the following.
- 3.3 In its initial assessment of the proposed scheme, the LPA recognised that “... *the site is of low biodiversity value and has no discernible heritage or amenity value.*”. It then went on in its response to advise that “*The principle of development as proposed subject to detail, is likely to prove acceptable.*”.
- 3.4 In terms then of the more detailed aspects of the proposed scheme, the Authority recognised that the site lies at a lower level than existing surrounding properties, particularly those of Barn Close. As a result of this, the LPA advised that any detailed planning application submission should include full levels details of the scheme,

including cross sections. In addition, and based on the information submitted, with regards to the relationship of those existing properties at Barn Close and the proposed building, the LPA also advised as follows:

“The rear elevations of properties in Barn Close will face the gable end elevation of the proposed building, they have short rear gardens and habitable room windows that will be overlooked by habitable room windows of what will be a substantial and potentially overbearing building. This relationship needs to be given further detailed consideration before an application is submitted and suitable section drawings should accompany any planning application that is made to demonstrate a satisfactory relationship.”

- 3.5 As a result of the above, further details have been prepared and amendments made to the scheme, which now form part of the final planning application submission.

4.0 PROPOSED DEVELOPMENT

- 4.1 The proposal is for the construction of 41 residential units. The following information therefore provides an overview of the scheme and should be read in conjunction with the accompanying documentation and drawings.

General Siting and Layout

- 4.2 The general layout of the site has been steered by a number of on-site and off-site factors, as well as comments received from the LPA in their pre-application enquiry response.
- 4.3 As a result of the above, the position of the proposed building has now been altered slightly to that shown in Plan C, to secure a greater level of separation between it and those existing residential properties to the south east.



Plan C

- 4.4 In addition and as can be seen from the submitted levels details, these have again given full consideration of the proposed building's relationship with existing buildings and their associated users in all directions, ensuring then that there is no resultant detrimental impact on residential amenity.

4.5 In the wider sense, the overall site layout provides a balance between developed and green spaces, securing a harmonious relationship with those existing spaces adjoining the site in this central urban area. This is secured through the retention and creation of large green spaces, as well as retaining all key existing boundary features (trees and hedgerows). A new SUDS basin in the northern portion of the application site will also form part of the proposed developments green infrastructure, as well as ensuring that the proposal adheres to the SAB legislation.

4.6 Provision within the layout is also made for sufficient off-street parking to serve the needs of both future residents and their visitors. Notwithstanding this, due to the sustainability of the site, sustainable travel patterns will be promoted and so the scheme also includes provision for bike storage and parking.

Scale and Mix

4.7 The proposal primarily relates to the construction of a single three storey building, set with a vertical and horizontal staggered formation to secure aesthetic interest and design variance.

4.8 Within the proposed building will be 41 affordable residential units, which includes the provision for the following mix of unit types:

- 35 One Bed Two Person units
- 6 Two Bed Three Person units

External Finishes

4.9 The finishes of the proposed building and its respective hard and soft landscaping elements have drawn on the local mixed palette of finishes found within the adjoining settlement. The proposed materials palette will therefore include the following:

Walls – Cream and Coloured Render, with elements of Timber Cladding

Roof – Slate Textured Roof Tiles

Fenestration – White uPVC Double Glazed Units

Rainwater Goods – Anthracite uPVC

Access and Parking

- 4.10 The proposal will be served by sufficient off-street spaces, including for visitor parking, in line with local highway authority standards. This will then also be supported by the provision for cycle parking as part of the overall development.

Drainage

- 4.11 All foul water will be disposed of into the main sewer.
- 4.12 In line with current surface water disposal regulations, the application proposal will include a SUDS element. This will consist of a mix of elements, including the aforementioned drainage basin.

Occupancy

- 4.13 As detailed above, all the proposed units will be affordable in nature, as defined by *Technical Advice Note 2: Planning and Affordable Housing*. These units will then be managed by Ateb Group Ltd.

5.0 PLANNING POLICY

5.1 NATIONAL PLANNING POLICY

5.1.1 In the preparation of any planning application, consideration must be given to national planning policy and guidance. At present, this takes the form of Welsh Government's "*Future Wales – the National Plan 2040*" national development framework, setting the direction for development in Wales to 2040, *Planning Policy Wales (Edition 11)* and a series of *Technical Advice Notes (TAN)* that deal with a range of topic areas.

5.1.2 As a starting point, all proposals must where relevant meet or contribute to the seven National Well-Being Goals as outlined in *The Well-being of Future Generations Act*, which are:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of more cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales



Figure 1

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- 5.1.3 At its core, the application proposal seeks to redevelop a brownfield site for the purposes of affordable housing, bringing the site back into beneficial use. This additional level of population, housing in an affordable manner, will therefore clearly contribute in a positive manner to the prosperity of the local economy, as well as the wider 'health' and 'resilience' of the local community.
- 5.1.4 The application site's position and close association with not only the adjoining urban form, but also that of the Town Centre, will also secure a 'cohesive' approach to the future use and development of the site and this area of Haverfordwest.
- 5.1.5 Finally, the Applicant is fully aware of the requirements to manage surface water from developments in a sustainable manner, as well as ensuring that any new proposals or additions must take into account existing biodiversity interests, as well as securing biodiversity net gain. Both these requirements have been given fully consideration and inclusion as part of the final design solution for the site, ensuring the proposed development will be done in a 'globally responsible' manner. All relevant national Well Being Goals are therefore considered to be satisfied by the application proposal.
- 5.1.6 In dealing and advising on new housing sites, PPW indicates throughout Chapter 3 and 4 that new housing developments should be well integrated with and connected to the existing pattern of settlements. The expansion of towns and villages should avoid creating ribbon development, coalescence of settlements or a fragmented development pattern. As detailed above, the proposed residential development is well located to the adjoining existing urban form and is located in close proximity to a range of local services and community facilities, as well as a number of well served bus stops providing access to further such provision.
- 5.1.7 PPW also advises that in determining applications for new housing, local planning authorities should ensure that the proposed development does not damage an area's character and amenity. Increases in density help to conserve land resources, and good design can overcome adverse effects, but where high densities are proposed the amenity of the scheme and surrounding property should be carefully considered.

5.1.8 High quality design and landscaping standards are particularly important to enable high density developments to fit into existing residential areas. The form of the application proposal has been given careful consideration, taking into account the character of not only the built form of the adjoining urban area, but also the range of green spaces found within it. The results of several key investigations – including those dealing with ecological assets – have had a fundamental role in determining and designing the proposed layout, ensuring therefore that the guidance and requirements of PPW have been adhered to in full.

5.1.9 In terms then of the proposed affordable units, TAN2 sets out detailed guidance on what is defined as being an affordable unit and how its occupancy would be controlled. Upon their completion, the Applicant – Ateb Group – will take control of the units and so will ensure that the requirements of TAN2 are met in full in terms of the future occupancy of the proposed units.

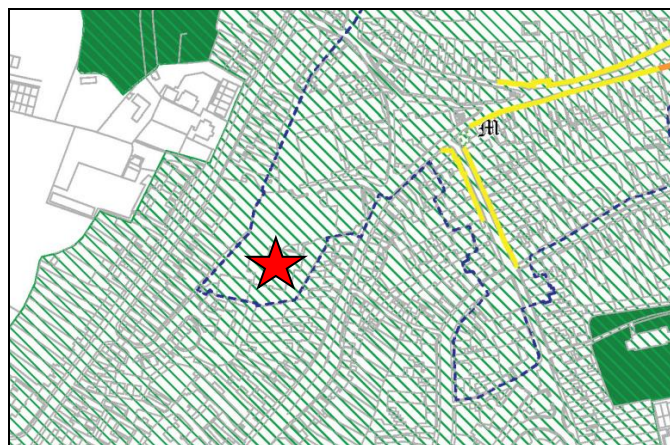
5.1.10 In summary therefore, the principle and detailed aspects of the proposed development are supported by the overarching guidance and principals set by national planning policy in relation to new affordable housing developments.

5.2 LOCAL PLANNING POLICY

5.2.1 The current development plan for the purposes of Section 38(6) of the Planning & Compensation Act 2004 is the *Pembrokeshire Local Development Plan* (LDP), which was adopted in February 2013. All policies of the document have been given consideration in the preparation of this planning application, including the provisions of the following:

- Policy SP 1 – Sustainable Development
- Policy SP 12 -Settlement Hierarchy
- Policy SP 13 – Settlement Boundaries
- Policy SP 14 – Hub Towns
- Policy GN.1 - General Development policy
- Policy GN.2 – Sustainable Design
- Policy GN.3 - Infrastructure and New Development
- Policy GN.12 - Town Centre Development
- Policy GN.26 – Residential Development
- Policy GN.28 – Local Needs Affordable Housing
- Policy GN.33 – Community Facilities
- Policy GN.37 – Protection and Enhancement of Biodiversity
- Policy GN.38 – Protection and Enhancement of the Historic Environment

5.2.2 Under the provisions of the above document, the site subject of this application lies well within the defined Settlement Boundary (Policy SP 13) of Haverfordwest, where the principle of development is therefore deemed acceptable by the LDP's policies. In addition to this, as the extract of the Proposals Map below illustrates, the site (red star) is also designated as forming part of the Town's Conservation Area (Policy GN. 38 - green hatching) and within the defined Town Centre Boundary (Policy GN. 12 – broken blue lines), but is located some distance away from the defined Primary and Secondary Retail Frontages (orange and yellow lines respectively).



Plan B

- 5.2.3 In terms of the site specific policies of the LDP referred to above, all have been given full consideration in the preparation of the scheme subject of this pre-application enquiry. With regards to the provisions of Policy GN. 38, whilst the site clearly lies within the boundaries of the Haverfordwest Conservation Area, its contribution to the historic importance of the Area is low, as recognised by the Authority in their pre-application enquiry response.
- 5.2.4 In fact, the current style and form of the existing building could be said to detract from the Area and the characteristics that led to its designation, were it located in a more prominent position. In contrast, the style, appearance and form of the proposed building is more reflective and sympathetic to the established palette of external finishes, whilst its design approach is more harmonious with the terraced-block form of the properties found within it. All this has been achieved without any direct or indirect impact on the historic interests and character of the wider Conservation Area, ensuring the requirements of Policy GN. 38 are met.
- 5.2.5 With regards then to the provisions of Policy GN. 12, whilst the site does indeed lie within the defined Town Centre Boundary, as can be seen from Plan B, it is very much at its edge and some distance from its core retail elements. In view of this and giving full consideration of the associated criteria of Policy GN. 12, it is clear that the redevelopment of the site will not detract or harm the Town Centre's vitality and viability. In fact, the introduction of additional residential units at such a sustainable location, will in fact make a positive contribution towards it.
- 5.2.6 In more detailed terms, Policy GN.1 and Policy GN.2 of the LDP then goes on to provide more detailed guidance on all forms of development, including residential. The two policies set out a series of criteria against which the details design aspects of proposals must be assessed.
- 5.2.7 Policy GN.1 covers a range of topic areas, detailed in individual criterion. In terms of the requirements of those relevant to the application proposal, it is considered that the form and density (Criterion 1) of the application are appropriate and compatible with existing surrounding forms and types of development. Furthermore, through

modifications to the proposed site layout requested by the LPA at the pre-application enquiry stage, the proposal will categorically have no impact on the amenity of adjoining land users, or the proposed land use of the application site (Criterion 2).

5.2.8 The redevelopment of the brownfield site in question includes provision for a range of green spaces and landscaping, as well as protecting any natural ecological assets it may currently include (Criteria 3 and 4, and in turn Policy GN.37).

5.2.9 As detailed above, the application site is located at a sustainable location with good access to a range of community facilities and local services (Criterion 5). In addition to this, the application proposal also includes provision for parking for both car and non-car modes of transport (Criterion 6). With the proposal including provision for the sustainable management of surface water (Criterion 8), the application proposal is considered to adhere to all relevant requirements of Policy GN.1.

5.2.10 Policy GN.2 then deals with the detailed design of a proposal. This application submission is accompanied by a comprehensive Design and Access Statement, setting out the design evolution of the application proposal, including how reference has been made to the existing surrounding built form and its relevant attributes. The application proposal has also been designed to ensure that it meets all current access requirements for all users, as well as incorporating energy conservation elements wherever possible. These factors, combined with high levels of natural surveillance, ensure then that all relevant aspects of Criterion GN.2 are fully complied with.

5.2.11 As detailed in Section 1 of this Statement, the development of the site in terms of access and traffic generation has already been assessed, the results of which can be found in the accompanying Transport Statement. The assessment looked at the means of access directly into the site, the route of traffic to the core highway network, the level of traffic generated, as well as the sustainable transport opportunities presented by the scheme. In summary, the Transport Statement concludes that the proposed development would have no detrimental impact on the existing local transport network and any of its users, as well as being at a location that promotes

sustainable travel patterns. As a result of the above, the proposed development therefore adheres to all relevant requirements of Policy GN.3.

5.2.12 It is recognised that as a form of residential development, provision must also be made where reasonably required for community contributions, which the Applicant fully supports and appreciates will be subject of further discussion with the LPA as part of any future planning application. Notwithstanding this, Policy GN.28 (*Local Needs Affordable Housing*) sets out targets for the provision of affordable units as part of any larger residential scheme, based on the settlement the site falls within. In the case of the site subject of this pre-application enquiry, the target of provision for sites within Haverfordwest is 10% of all proposed units must be of an affordable nature. As detailed previously in this Statement, the proposal is in fact for 100% affordable units and so the requirements of Policy GN. 28 are more than satisfied.

5.2.13 In summary therefore, it is considered that the principle of the proposed development adheres to all relevant requirements of adopted local planning policy.

6.0 CONCLUSIONS

- 6.1.1 The proposal subject of this application submission is for a scheme of 41 affordable apartments on a brownfield site located at the heart of the County Town of Haverfordwest.
- 6.1.2 The application site forms part of a larger land holding of the Applicant that contains a series of buildings that have long been vacant. Those to the north east of this current application have been identified as being suitable for refurbishment, but in the case of those on the application site, this is simply not feasible. The site's reuse and regeneration for new affordable homes therefore represents the most logical and suitable solution for the future.
- 6.1.3 The proposed development will also benefit from a range of opportunities to promote sustainable transport modes, not least due to the close proximity of a wider range of community facilities and local services. In addition, the accompanying Transport Statement demonstrates that any traffic generated by the development will not lead to any detriment to either existing or proposed highway users.
- 6.1.4 The proposed density, scale, mix and layout of the proposal has given full consideration of on-site factors such as topography, landscape and biodiversity assets, as well as the nearby core of the Conservation Area it forms part of. In addition, the detailed design and finishes of the proposed building has similarly sympathetically drawn on the existing housing stock of the area to ensure that the proposal provides a sensitive and sustainable design solution.
- 6.1.5 The matters of both surface and foul water drainage are representing increasing challenges to the delivery of new development and homes. However, as can be seen from the accompanying submissions, both matters can be dealt with by the proposed development in a manner that fully satisfies all regulatory requirements.

6.1.6 In conclusion therefore, the proposal represents an appropriate and sustainable housing development that adheres to all relevant current planning policy and regulatory requirements.