



Pembrokeshire County Council  
Local Development Plan 2

Gypsy and Traveller Background Paper  
including Sites Assessment

December 2019

## Contents

1. Introduction.....	3
Local Development Plan Review .....	3
2. Legislative and Policy Context .....	3
Legislation .....	3
3. Local Development Plan Policies .....	4
Figure 1.1: PCC LDP1, Policy GN.31 .....	5
Figure 1.2 PCC LDP1, Policy GN.32 .....	5
Figure 1.3 PCNPA LDP1- Policy 46 and; LDP2 - Policy 51 .....	6
4. Gypsy and Traveller Accommodation Assessments .....	7
Gypsy and Traveller Accommodation Assessment (GTAA) 2015.....	7
Table 1.1 : Planning Applications approved since November 2015.....	7
Draft Gypsy and Traveller Accommodation Assessment (GTAA) 2019.....	8
5. Site Assessments.....	8
Methodology.....	10
Figure 1.4: Deposit Draft Policy LDP2 ‘Gypsy and Traveller Sites and Pitches’ .....	10
Table 1.2 : Site for Assessment .....	10
Figure 1.5 : Site Locations .....	11
Candidate Sites .....	11
Figure 1.6 : Candidate Site 148 North East of Pembroke.....	12
6. Conclusions.....	12
7. Recommendations .....	13
Appendix 1 Site Assessment.....	14

# 1. Introduction

## Local Development Plan Review

- 1.1. Pembrokeshire County Council is preparing a replacement Local Development Plan (LDP) – **Local Development Plan 2**. When adopted, it will provide a revised and updated policy framework to guide development outside of the National Park and inform planning decisions taken by the County Council. During the **Review**, the existing Local Development Plan (up to 2021) will remain in place until Local Development Plan 2 (LDP2) is adopted.
- 1.2. The Authority has a duty under the Housing (Wales) Act 2014 to ensure that the accommodation needs of Gypsies and Travellers are properly assessed and that the identified need for pitches is met. This paper sets out the steps the Authority has undertaken to establish the accommodation needs of Gypsy's and Travellers residing in or to its area (including the National Park) and how it has assessed sites to meet this need.
- 1.3. It will set out the approach adopted by the Authority through the Local Development Plan review and evidenced by the revised Gypsy traveller Accommodation Assessment (GTAA) 2019.

# 2. Legislative and Policy Context

## Legislation

- 2.1. The Welsh Government's '[Enabling Gypsies, Roma and Travellers](#)' (June 2018) replaces 'Travelling to a Better Future' [\(2014\)](#) and sets out the Welsh Government's vision for the inclusion of these communities in Welsh society.
- 2.2. *Enabling Gypsies, Roma and Travellers*' includes a commitment from the Welsh Government to work with Local Authorities to deliver new Gypsy and Traveller sites. The assessment of Gypsy and Traveller accommodation needs, and the duty to make provision for sites where the assessment identifies need, became statutory requirements under the Housing (Wales) Act 2014, whilst the [Welsh Government's Sites Capital Grant](#) will help provide investment in Council sites.
- 2.3. Under section 106 of the 2014 Act the Welsh Government published '[Undertaking Gypsy and Traveller Accommodation Assessments Guidance](#)' to assist Local Authorities to produce a robust assessment of Gypsy and Travellers accommodation needs in their area. This GTAA has been produced in accordance with the guidance. A new GTAA must be undertaken at least every 5 years. This GTAA will update the findings of the GTAA 2015, and is being undertaken in 2019 to provide a robust evidence base for the Local Development Plan review.
- 2.4. Other legislation and guidance relating to the provision of Gypsy and Traveller sites includes:
- 2.5. The [Mobile Homes \(Wales\) Act 2013](#) provides additional safeguards for those living on and running local authority Gypsy and Traveller sites.
- 2.6. [Welsh Government Circular 005/2018 'Planning for Gypsy, Traveller and Showpeople Sites'](#) was published in June 2018 and provides an updated guidance on

the planning aspects of identifying sustainable sites for Gypsies and Travellers and how Planning Authorities and Gypsies and Travellers can work together to achieve this aim. It supersedes Circulars 30/2007, 78/91 and 76/94. Welsh Government's [Designing Gypsy and Traveller Sites guidance](#) provides practical advice to assist Local Authorities to ensure their sites are fit-for-purpose. Following this guidance will help Local Authorities and others in the development and improvement of Gypsy and Traveller sites in their area, and will form part of the consideration of the Welsh Government in assessing applications for Sites Capital Grant funding in relation to Gypsy and Traveller sites.

2.7. Once the GTAA has been approved by Welsh Ministers, Local Authorities are subject to a legal duty to exercise their functions to provide mobile home pitches to meet the identified needs. They may do this in a variety of ways - by providing Local Authority Gypsy and Traveller sites, supporting households to develop viable private sites and supporting households to develop viable community led approaches such as Community Land Trusts.

2.8. Should the Council seek to develop additional pitches or sites it can apply for the Welsh Government's Gypsy and Traveller Sites Capital Grant which currently provides £3.5 million per annum for site refurbishment and development purposes. The maximum available per site is £1.5 million and priority is being given to schemes providing additional pitches. There is no guarantee that a bid for funding will be successful. Pembrokeshire County Council has been awarded a grant of £1.42m to assist in the delivery of an extension to Kilgetty Kingsmoor Common Gypsy Traveller site.

### 3. Local Development Plan Policies

3.1. Pembrokeshire has two local planning authorities – Pembrokeshire County Council (PCC) and the Pembrokeshire Coast National Park Authority (PCNPA). Both authorities have adopted Local Development Plans (LDPs). Both LDPs are under review.

3.2. The PCNPA replacement LDP Examination in Public took place in July 2019. The PCC LDP review is underway and it is anticipated that the Deposit Plan will be published for consultation at the end of 2019.

3.3. PCC has two policies within the LDP which reference Gypsy and Traveller development: Policy GN.31 allocates land for Gypsy and Traveller accommodation; and Policy GN.32 sets out the criteria that will be used to determine planning applications for new sites or extensions to existing sites outside settlement boundaries. PCNPA has one policy which is pertinent to Gypsy and Traveller development: Policy 46 which sets out the criteria used to determine planning applications for new sites. This plan is under review, and has been through Examination and the Inspector's report is awaited. The policies are included in Figures 1.1, 1.2 and 1.3, below:

Figure 1.1: PCC LDP1, Policy GN.31

**GN.31 Gypsy Traveller Sites and Pitches Allocation**

Land is allocated for additional Gypsy Traveller accommodation at:

Site Reference	Site Name	Area (ha)	Indicative number of pitches
GT/095/001	Catshole (Castle) Quarry	0.39	8
GT/050/001	Kingsmoor Common, Kilgetty	0.78	15

Figure 1.2 PCC LDP1, Policy GN.32

**GN.32 Gypsy Traveller Sites and Pitches**

Outside of Settlement Boundaries new permanent or transit gypsy traveller sites or extensions to existing authorised sites will only be permitted where it is demonstrated that the proposed development:

1. Cannot be accommodated on an existing authorised site and is to meet locally arising need or the need of families with a local connection;
2. Is accessible to existing community, social, educational and other services; and
3. Is sensitively sited in the landscape and satisfactory landscaping is provided.

Figure 1.3 PCNPA LDP1- Policy 46 and; LDP2 - Policy 51

<p>Policy 46</p>	<p><b>Gypsy Sites</b></p> <p>Proposals for Gypsy and Traveller sites will be permitted where:</p> <ul style="list-style-type: none"> <li>a) evidence of need to locate or provide transitory arrangements in the area has been identified; and</li> <li>b) the site is well located to serve the needs of Gypsy and Travellers including the need to access local services; and</li> <li>c) the site has good access to a public road which is safe and direct; and</li> <li>d) the site is suitable for the development and on site services facilities can be adequately provided; and</li> <li>e) amenity issues for both residents on the site and neighbouring properties are adequately addressed; and</li> <li>f) the proposal does not cause significant visual intrusion, is sensitively sited in the landscape and satisfactory landscaping is provided.</li> </ul>
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LDP2 Policy 51 Gypsy and Traveller and Showpeople Sites (as submitted to the Inspector)

**Gypsy and Traveller and Showpeople Sites**

<p>Policy 51</p>	<p><b>Gypsy Traveller and Showpeople Sites</b></p> <p>Proposals for Gypsy Traveller and Showpeople sites will be permitted where:</p> <ul style="list-style-type: none"> <li>a) <del>The applicant has demonstrated there are no suitable pitches available within existing authorised sites or land available within existing settlement limits.</del> <b>♣</b>; and</li> <li>b) the site is well located to serve the needs of Gypsy and Travellers or Showpeople including the need to access local services; and</li> <li>c) the site has good access to a public road which is safe and direct; and</li> <li>d) the site is suitable for the development and on site services <b>▶ and ◀</b> facilities can be adequately provided; and</li> <li>e) amenity issues for both residents on the site and neighbouring properties are adequately addressed; and</li> <li>f) the proposal does not cause significant visual intrusion, is sensitively sited in the landscape and satisfactory landscaping is provided.</li> </ul>
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1 **♣** and **▶ ◀** denote changes proposed since the Deposit Plan

## 4. Gypsy and Traveller Accommodation Assessments

### Gypsy and Traveller Accommodation Assessment (GTAA) 2015

- 4.1. The GTAA was published in February 2016 following approval from the Welsh Government Minister. Key messages from the GTAA were
- Pembrokeshire has a relatively large resident Gypsy and Traveller population, in comparison to Wales as a whole
  - 118 households completed the survey, giving a response rate of 77%
  - An unmet need for 32 residential pitches, plus two Travelling Showpeople's yard, over the next 5 years (by the end of 2020) has been identified in this assessment.
  - Over the LDP plan period for PCC and PCNPA (up to the end of 2021) this equates to a need for 37 residential pitches and two Travelling Showpeople's yards. The unmet need over the period up to the end of 2031 for the pending PCNPA and PCC Plans is projected to be 101 pitches, plus the two aforementioned yards.
- 4.2. Whilst the Authority identified concerns regarding the GTAA standard survey form provided by Welsh Government, following the GTAA survey, with regards to the robust identification of the need for transit sites within the county.
- 4.3. In response to the identified need within the GTAA, the authority allocated an extension to the existing Kilgetty Kingsmoor Common site for a further 15 pitches, and included criteria based policies which support the development of private sites where they meet the criteria. A significant number of sites have gained planning permission in recent years.
- 4.4. Since the date of the 2015 GTAA survey the Authority has granted planning permission for **12** pitches as part of the Kilgetty Kingsmoor Extension (an application for funding made to the Welsh Government was successful), and a further **19** pitches on private sites, plus a Travelling Showperson's yard, and an additional yard where enforcement. (**2** Travelling Showpersons' Yards).

Table 1.1 : Planning Applications approved since November 2015.

Planning Application	Location	Pitches	/	Date
17/790/PA	Consent for Kilgetty allocation	12		20/12/18
15/0657/PA	Pembroke	5		12/11/15
14/0448/PA	Kilgetty	2		17/2/16
15/1034/PA	Hundleton	1		1/4/16
15/1269/CL	Hundleton	4		11/4/16
16/0475/PA	Cosheston	3		31/3/17
16/1244/PA	Biggin-Hill	2		7/8/17
17/0485/PA	Maiden Wells	1		9/10/17
18/0746/PA	Letterston	1		20/12/18
	Total	31 pitches approved since November 2015		
Planning Application	Location	Yards	/	Date



18/0338/PA	Portfield gate	Travelling showpersons yards (plus 1 where no enforcement action to be taken on long established elements)
	Total	2 yards

## Draft Gypsy and Traveller Accommodation Assessment (GTAA) 2019

- 4.5. The draft Gypsy Traveller Accommodation Assessment, submitted to the Welsh Minister's team mid October 2019, following approval by the Gypsy Traveller Steering Group and endorsement by Council Cabinet. The Minister's response is awaited at the time of the publication of this background paper. The following is an extract from the conclusions of the draft GTAA.
- 4.6. Surveys were undertaken in June and July 2019 for this accommodation needs assessment, following a methodology agreed by the Steering Group. Surveys included residents on Local Authority residential sites; a Local Authority transit pitch; private sites; unauthorised encampments and developments; and tenants in 'bricks and mortar' accommodation.
- 4.7. Pembrokeshire County Council contacted over 200 household addresses as part of the GTAA. 118 households completed the survey, 70 households either refused to take part or were unable to be contacted during the survey. This provides a total figure of 188 Gypsy and traveller households, providing a response rate of 63%. (A further 31 households confirmed they were not part of the Gypsy or Traveller community. Other reasons for not participating within the survey can be found at table 4.3).
- 4.8. An unmet need for 14 residential pitches, over the next five years (by the end of 2024) has been identified in this assessment. Over the Plan period for PCC and PCNPA (up to the end of 2031 and 2033) this equates to an overall need for 56 residential pitches. (Net additional need from 2025-2033 is 42 pitches)
- 4.9. Respondents to the survey also generally identified a need for more transit pitches and sites in Wales. Pembrokeshire County Council considers that the questions within the survey surrounding need for transit pitches/sites are not comprehensive enough to establish meaningful results for this aspect of the survey. It considers that these questions should be improved for future surveys. These concerns will be fed back to Welsh Government.
- 4.10. The Authority has analysed the responses which identified a need for additional accommodation. To help to plan future provision, respondents were asked what area within Pembrokeshire they would like to move to. The general locations identified by people in need are generally within the south of the county with Haverfordwest providing the furthest location to the north.

## 5. Site Assessments

- 5.1. The potential to identify sites for Gypsy and Traveller Accommodation to meet need identified within the GTAA has been through two approaches



- (i) To consider the Council's land register to identify land which is unused or under used in the Council's ownership and located in places where the Gypsy Traveller Community wish to reside
- (ii) To call for Candidate sites and additional candidate sites as part of the Local Development Plan review process.

5.2. This background paper sets out the process undertaken to seek out and identify and assess sites in the vicinity of Pembroke Dock and Pembroke in accordance with the need identified within the 2015 GTAA, and subsequently updated by the draft GTAA 2019.

### **Size and Pitch Requirements**

5.3. In 2015, Welsh Government published 'Designing gypsy and traveller sites' which includes generic guidance and site specific information about site design.

5.4. Key strategic information within the guidance (rather than detailed information about the design and layout of a site) includes -

- New sites should be no larger than 20 pitches<sup>2</sup>
- Councils should consider needs when deciding on the location of a site
- Sites should be close to services
- Sites should have access to good highway and public transport links
- Sites should not be located at hazardous places, such as those liable to flood, or have contamination which cannot be remediated.

5.5. In seeking to identify suitable sites it is necessary to consider the extent of need and the size of site required. No specific guidance is available in relation to the overall site size for a single pitch however it is clear that the site must

- Allow for a static caravan
- Allow for a touring caravan
- Allow for parking of two vehicles
- Utility block
- Allow minimum fire distances of 6 metres between caravans

5.6. In the case of Pembrokeshire Gypsy and Traveller requirements, there is also a known desire for adjacent paddocks for the keeping of horses and added value of amenity and play space for children / families.

5.7. It is considered that a minimum pitch of 17m x 17m (289sq m) is sufficient for all hardstanding activities and that additional space where possible is desirable for

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<sup>2</sup> Circular 005/2018 'Planning for Gypsy, Traveller and Showpeople Sites in Wales' requires that sites should be in proportion to local settled communities.

single family use e.g. horse paddock, outdoor amenity space and potential play space.

## Methodology

- 5.8. This assessment has been undertaken using a desk based exercise for the identification of Pembrokeshire County Council’s land holdings in the vicinity of Pembroke and Pembroke Dock.
- 5.9. A minimum threshold of 2,000 sq. m 0.2 ha (3 pitches) was considered appropriate to allow for single family occupation plus expansion for future need, amenity and play space.
- 5.10. Sites within or closely related to existing residential development and having the potential for safe vehicular, public transport and pedestrian access to services were considered in detail on a sequential basis in line with the requirements of Circular 005/2018.
- 5.11. The Local Development Plan draft criteria based policy was given considerable weight in the acceptability of sites as follows.

Figure 1.4: Deposit Draft Policy LDP2 ‘Gypsy and Traveller Sites and Pitches’

**GN 20 Gypsy and Traveller Sites and Pitches**

Proposals for new permanent or transit Gypsy and Traveller sites or pitches, or extensions to existing authorised sites outside settlement boundaries, will only be permitted where

1. It has been demonstrated that no suitable site or pitches are available within settlement boundaries or closer to settlement boundaries, including at existing authorised and permitted sites;
2. It is sustainably located for access to existing community, social, education and other services;
3. It is sensitively sited within the landscape; and
4. It is appropriate in scale to the local community and would not have a significant adverse impact on local amenity.

- 5.12. A total of 4 PCC owned sites were assessed in detail (see Appendix 1). The location of these sites were :-

Table 1.2 : Site for Assessment

Site Reference	Site Name, Location
1	Pembroke Road, Pembroke Dock
2	Pennar, Pembroke Dock
3	Watery Lane 1
4	Watery Lane 2

Figure 1.5 : Site Locations



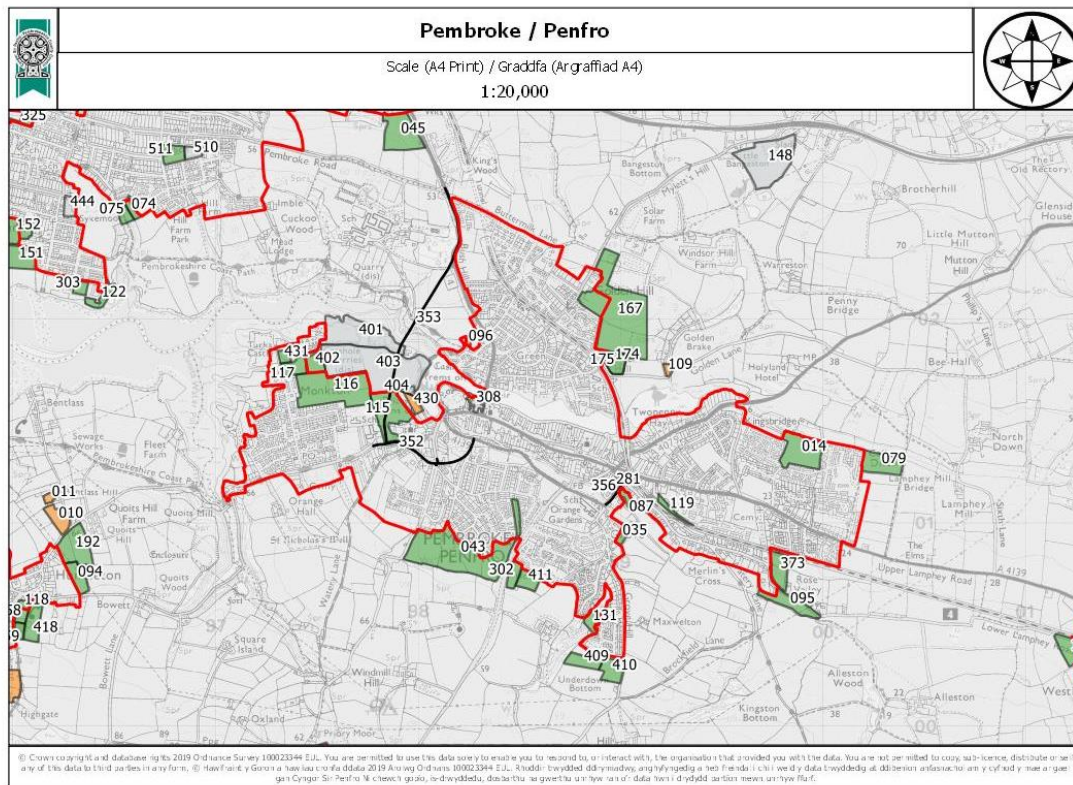
## Candidate Sites

5.13. Pembrokeshire County Council issued a call for Candidate Sites between 22nd March and the 14th August 2018 and between 17th December 2018 and the 4th February 2019. Candidate Sites are sites suggested by the public for inclusion in the LDP. 512 Candidate Sites were received by the Authority for consideration. All sites were published, including maps within the Candidate Sites' Register.

5.14. Following a calls for candidate sites a single site was submitted at Slade Cross, to the east of Pembroke. Candidate Site 148 was submitted as a Gypsy Site, with an initial indication and site layout showing 14 units, on a former insert landfill site at land adjacent to A477, Buttermilk Lane, Pembroke, and at 4.69 hectares. It is shown as site 148 on the following map.



Figure 1.6 : Candidate Site 148 North East of Pembroke



5.15. The site was submitted during the first round of candidate sites and opportunity to comment was made when the Candidate Sites register was published in December 2018 as part of the Preferred Strategy Consultation. No formally submitted comments were received in relation to this site during the LDP2 Preferred Strategy consultation, however numerous informal comments were also submitted for this, and other candidate sites following the closure of the Preferred Strategy consultation. They were received by the authority as informal comments, and were taken into account in the Deposit Plan, but were not registered as formal comments on the Candidate Sites.

5.16. The Candidate site was comprehensively assessed, including a preliminary ecological assessment (site walk over) by the Authority’s ecologist and has not been allocated within the Deposit LDP2. The assessment of the site will be published within the Authority’s Sites Report, alongside the Deposit Plan consultation. The constraints identified in relation to the site raise serious concerns about the deliverability of development. These include highway constraints, ecology, public protection issues and the scale of the proposal.

## 6. Conclusions

6.1. The assessment has shown that whilst the 4 assessed sites (5 options) considered in detail have the scale to accommodate Gypsy and Traveller provision,

they are variously constrained by landscape and visual impact, location and proximity to settlements, access and flood risk.





- 6.2. None of the sites provide a realistic option for allocation for Gypsy and Traveller site accommodation.
- 6.3. The proposed candidate site, as demonstrated above was considered in detail, and serious concerns raised regarding deliverability.
- 6.4. Gypsy and Traveller sites require a significant capital investment, current estimates for the Kilgetty Kingsmoor extension site are £110k per pitch. For this reason and the lack of suitability of land owned by the Authority and Candidate Sites, small self-development sites are considered an appropriate way forward to help address need.
- 6.5. There is the potential for such sites to come forward on privately owned land, and for the Authority to be able to dispose of land to the Gypsy and Traveller Community to enable site development by the community. This potential was muted as a potential option within the Gypsy Traveller GTAA steering group meeting January 2019. It would be for the community to identify potential sites and to establish the ownership.

## 7. Recommendations

- 7.1. Consider planning applications for the development of new or expanded Gypsy and Traveller sites in the light of the existing Local Development Plan criteria based policy, and Local Development Plan2 policy once adopted (approximately 2021/2022).
- 7.2. Local Development Plan policy has a proven track record in the approval of acceptable proposals, and is considered a robust and realistic basis for the assessment of sites. There is no reason to believe that applications will not continue to come forward for private family scale sites within the County.

## Appendix 1 Site Assessment




### Site Name: Pembroke Road

Site Area	2.6 ha (26,000 sq. m)	Site Ref 1
Location Pembroke Road, Pembroke Dock.		
Current Land Use	<p>Horse grazing. Allocated in LDP 1 for residential development. No planning application has been submitted for the site.</p> <p>Adjacent to a multi user hard surface track which follows the route of Pembroke Road. Close to Pembroke School and within walking distance at the edge of settlement.</p>	
Site Assessment	<p>This site forms a sloping site towards a rising skyline location when viewed within close and distant views. Access to the highway would need to cross a multi-user path. The frontage to Pembroke Road is level for several metres and unfortunately slopes away to the north within a relatively short distance limiting opportunities to mitigate any visual impact in the wider landscape, without significant planting and the introduction of strong green boundaries. Any further development at the northern edge of Pembroke Road would require a well-defined</p>	







	sense of separation to ensure that the settlements of Pembroke and Pembroke Dock do not appear to coalesce.	
Known Constraints	Ecology issues in relation to protected species.	
Conclusion	<p>The site has the potential to be prominent in the landscape, unless significant measures are taken to ensure appropriate screening. The steeply sloping area to the north would not be suited for this form of development.</p> <p>The site was allocated for residential development within LDP1 and remains required for development and is allocated within LDP2 for residential development along the road frontage.</p>	

**Site Name: Pennar**

Site Area	1.4 Ha 14,200 sq. m Area with potential 0.39 ha, 3,900 sq. m	Site Ref 3
Location To the south of Grove Street at Pennar, Pembroke Dock		
Current Land Use	Agricultural grazing land, paddocks.	
Site Character	<p>These fields are located at the periphery of Pembroke Dock near the Pembroke River as it flows into the Milford Haven Waterway. Existing uses at the site have introduced animal shelters and small touring caravans which visually, introduce developed elements to the otherwise fenced paddocks. A narrow strip of fields separate these paddocks from the waterway, except to the west, where the land extends into the waterway area.</p> <p>The site forms a bounding with existing residential development at its northern and eastern edges.</p>	





		
<p>Site Assessment</p>	<p>The site is relatively flat and in part sits below the properties fronting onto Grove Street. Suitable separation distances and boundary treatments could enable part of this site to be developed for G&amp;T uses, along with retention of adjacent grazing land for keeping of horses. However, the visual impact and impact on the character of the area would be intrusive.</p> <p>Whilst the site is not subject to flood risk, as shown on NRW public maps land along the Pembroke River water way is subject to risk. The site is only accessible via relatively steeply inclined highways and is at the end of the transportation network in this area.</p>	
<p>Alternative area</p>	<p>The single central field and adjacent paddock.</p>	

		
Known Constraints	Restricted highway access, Proximity to Pembrokeshire Marine Special Area of Conservation, Milford Haven Waterway Site of Special Scientific Interest. Current flood risk, at this coastal location runs outside the south of the site.	
Conclusion	The site does not have sufficient potential for a sizable allocation within the LDP2. Further, this development would urbanise the site, would not relate well to existing built development, and unless well screened would be visually intrusive into the countryside and the Haven beyond.	

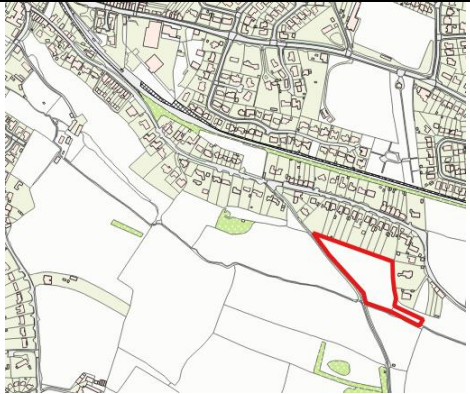



**Site Name Watery lane 1, Pembroke**


Site Area	1.9 ha (19,000 sq. m)	Site Ref 3
Location Watery Lane, south of Lower Lamphey Road Pembroke		
Current Land Use	Agricultural land, including trees and disused quarry mapped.	

<p>Site Character</p>	<p>Linear field bounded by trees and stream culvert along the road way which carries a significant flow and would need to be bridged.</p>	
<p>Site Assessment</p>	<p>This field forms a low lying element of the wider countryside which rises up to the linear development at Lower Lamphey Road and further the ridgeline to the south. Whilst it is not a visually intrusive site, it is clearly separated from the built settlement, along a narrow single track road and fronted the highway by a culvert which at the time of visit was free flowing with water from a nearby pond, and likely feeding into local streams. The potential add on costs to provide appropriate access, the physical separation from the built area and lack of suitable access within the highway network acts against the introduction of this site.</p>	
<p>Known Constraints</p>	<p>Priority protected species recorded close to this site. Access is narrow and crosses fast flowing culvert.</p>	
<p>Conclusion</p>	<p>The site is isolated from the settlement of Pembroke, access constraints are likely and development costs introduced by the need to protect and cross the water culvert. Not allocated for development.</p>	



**Site Name: Watery Lane 2, Pembroke**

Site Area	1Ha 10,000 sq. m	Site Ref 4
Location Watery Lane, south of Lower Lamphey Road Pembroke		
Current Land Use	Currently used as horse grazing and paddock	
Site Assessment	<p>This site sits adjacent to rear gardens and residential dwellings at Lower Lamphey Road. It is generally below the level of development and well contained in the landscape.</p> <p>There are limited numbers of trees at the boundary and it is currently used for grazing.</p>	

	<p>Queries over the potential for access via a short stretch of narrow highway and low lying so potential for flooding.</p>	
<p>Known Constraints</p>	<p>The southern. Lower section, along the roadway, is at risk of flooding and would be where access to the site would be formed. Lies within the HSE major hazard zone.</p>	
<p>Conclusion</p>	<p>Limited potential for development within level areas due to flood risk.. Sloping areas away from the road are not at risk, however mitigation to enable safe access to this land at time of flood would likely significantly alter the character of the access and roadway into this rural lane, and impede access by residents across flood zones. A further study would be required to ensure that flood risk is not increased elsewhere. Not suitable for development.</p>	