

INCLUSIVE DESIGN, ACCESS & SUSTAINABILITY STATEMENT

PROPOSED RESIDENTIAL DEVELOPMENT OF 23 NO. AFFORDABLE HOUSING UNITS. THE APPLICATION IS ALSO TO INCLUDE, INFRASTRUCTURE, LANDSCAPING IMPROVEMENTS; AND ANY ANCILLARY WORKS ON LAND SOUTH OF LLON CARDI BACH, CILGERRAN, CEREDIGION.

Prepared by:

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May 2025 v1

**On behalf of:
Tai Wales & West Housing**

**Status:
Planning Issue**

CONTENTS:

1. Appraisal
2. Accessibility
3. Character (including amount, layout, scale, appearance and landscaping)
4. Community Safety
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6. Movement to, from and within the development

APPENDICIES

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Appendix 2 – Local Authority Pre-Application Response (Highways Department).
Appendix 3 – Tree & Hedgerow Survey/Report by the Arb Team.

1.0 APPRAISAL

- 1.1 RLH Ltd has been instructed by Tai Wales & West Housing, in respect of an application for full planning permission to Pembrokeshire County Council. The application seeks approval for:
- **Proposed residential development of 23 no. affordable housing units. The application is also to include, infrastructure, landscaping improvements; and any ancillary works on land south of Llon Cardi Bach, Cilgerran, Ceredigion**
- 1.2 The principle concept of the scheme is aimed at providing quality, aesthetically pleasing, well designed sustainable homes to meet housing need in the local area. The following Inclusive Design & Access Statement (DAS) has been prepared to support a detailed planning application for the development of 23 affordable housing units on the application site.
- 1.3 The **aim is to provide affordable housing units** which meet the **Welsh Government's criteria** to draw **Social Housing Grant (SHG)** and ensure the scheme development costs can be met. The scheme has been designed in accordance with the Welsh Government's Design Quality Requirements which also include Lifetime Homes Standards, RNIB Standards. Tai Wales & West Housing are the perspective purchasers of the land, for the delivery of **100% affordable housing** to assist in **meeting housing need** for the **Service Village of Cilgerran** and surrounding areas.
- 1.4 ***"Tai Wales & West Housing's vision is to achieve strong, sustainable growth to make a difference to people's lives, homes and communities."***
- 1.5 This DAS should be read in conjunction with submitted plans, supporting documentation and planning application form which are appended to this DAS.
- 1.6 **Design principles and concepts**
This Design and Access Statement should be regarded as a communication tool setting out objectives and principles of good and inclusive design which can grow and be referred to throughout the lifetime of the project.
- 1.7 **Compliance of Planning Policy, Legislation & Guidance**
- Town and Country Planning Act 1990 (as amended)
 - Town and Country Planning (GDP) Order 1995 (as amended)
 - Town and Country Planning (GDP) Wales Order 2009
 - Planning Policy Wales (PPW) Edition 10
 - WAG TAN 12 – Design
 - Disabled Discrimination Act 1995
 - Approved Document 'M', Access and Use of Buildings
 - Approved Document 'K' of the Building Regulations, Stairs, Ramps and Guards
- 1.8 **Pembrokeshire County Council LDP Policies**
- SP 1 (Sustainable Development)
 - SP 9 (Welsh Language)
 - SP 12 (Settlement Hierarchy)
 - SP 13 (Settlement Boundary)
 - SP 14 (Hub Towns)
 - GN.1 (General Development Policy)
 - GN.2 (Sustainable Design)

- GN.3 (Infrastructure and New Development)
- GN.26 (Residential Development)
- GN.28 (Local Needs Affordable Housing)
- GN.37 (Protection and Enhancement of Biodiversity)

1.5 Relevant Supplementary Planning Guidance (SPG)

- Affordable Housing (adopted 14th September 2015)
- Parking Standards (adopted 28th June 2013)
- Development Sites (updated December 2016)
- Biodiversity (adopted May 2021)
- Renewable Energy (adopted 31st October 2016)

1.6 Pre-Application Enquiry/Response with Planning Department

1.7 A pre-application was submitted to Pembrokeshire County Council on 21st July 2020, with the pre-application enquiry being allocated to Mr Ceri Jones (Area Team Leader). As part of the pre application submission an initial design scheme was put forward to the case officer for consideration.

1.8 A written response was received on 4th September 2020 (Ref No. PR/0085/20). The relevant correspondence can be found in **Appendix 1**.

1.7 Public Consultation

1.8 Pre-Application public consultations is being carried out by Amity Planning Consultants. The requirement to undertake pre-application consultation applies to all planning applications for “major” development (full or outline), as defined in article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO), and applications for Developments of National Significance (DNS).

1.9 The report will set out the statutory consultation and engagement undertaken leading up to a formal submission. It describes the steps taken to ensure that the statutory requirements have been met, provides responses to comments made and describes the changes that have resulted from this or the justification for not amending the scheme, where applicable.

2.0 Site and Location

2.1 The site to which this proposal relates, is Land south of Llon Cardi Bach. The site is just outside the settlement limits of Cilgerran and as such is an ‘exception site’.

2.2 The site is located on the settlement boundary of the ‘Service Village’ of Cilgerran which is a large village, located between the main Hub Towns of Cardigan and Newcastle Emlyn. Cilgerran is approximately 6.5 km from Cardigan town centre and 15 km from Newcastle Emlyn. The site is positioned to the south of Cilgerran, immediately joining the settlement boundary. The site is centred on grid reference SN 19627 42706.



Extract taken from LDP2 Candidate Site for Pembrokeshire in green block.

- 2.3 The site itself is crudely rectangular in shape, with the southeast corner, chamfered off. The site has moderate slope from southwest to north-east. The site is predominantly comprised of an undeveloped green field. The main vehicular access gate to the site is located on the west boundary, off the existing C3068 link road between Cilgerran and Crymych. All site boundaries are formed by undeveloped green land and Hedgerow/vegetation, except for part of the north boundary, which is separated from Llon Cardi Bach by an existing post and rail fence and grass verge.



- 2.4 There are no listed buildings or scheduled ancient monuments within the site or within proximity of the site. Cilgerran Castle is approximately 0.5km to the north of the site.

3.0 ACCESSIBILITY

- 3.1 There have been pre-application consultations with Mr Mike Harries (Pembrokeshire County Council Highway Planning Liaison Officer) - The correspondence can be found within **Appendix 2**.
- 3.2 The pre-application response was supportive as detailed in the following extract below:

"I can confirm that the vehicle access, Llon Cardi Bach can now be accepted for the proposal. The carriageway width is 5 metres, there are no obvious defects, and it is not too windy. Each existing dwelling appears to have enough off-street parking, so no need to fill the street with parked cars. Whilst there is no footway, or declared margin, on the south side, as there is an alternative means of achieving safe pedestrian connectivity to the village then there is no requirement to create a footway on the south."

- 3.3 Roads have been designed to adoptable standards with 5.5 metre carriageways and 2.0 metre pavements/service strips. The existing turning head within Llon Cardi Bach will be improved providing visitor parking to Llon Cardi Bach, along with a new pedestrian link to the proposed development. The new site entrance will result in some minor road/verge realignment. Please refer to civil engineering supporting information which accompanies this application.

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- 3.4 The site has been designed to accommodate a minimum of two parking bays per unit and one parking bay per flat. The site has the benefit of providing 4 additional parking spaces to serve the adjacent estate as previously mentioned.
- 3.5 The access to each unit has been suitably designed to allow adequate access for emergency vehicles and any maintenance contractors and equipment. The legibility of principle entrances will be identified by house name/numbers. Visitors will arrive by car or using the public transport.
- 3.6 Lifetime Homes design criteria makes it absolutely clear that with non-communal parking areas the entire parking space should have a firm surface and be level with no gradient exceeding 1:60 and/or no crossfall for drainage exceeding 1:40. This has an impact on sites with even a modest gradient. The gradients associated with the road layouts have been set out in accordance with this guidance, for instance the spur roads have been designed to have a gradient not exceeding 1:15 and the crossfall on the parking bays off the road are at a maximum gradient of 1:40. This pattern is mimicked throughout the site and has almost dictated the site layout. To accommodate the guidance set out in the Lifetime Homes design criteria the levels of the land will be slightly raised to the south of the site and reduced slightly to the north.

4.0 CHARACTER

- 4.1 Cilgerran is characterised by traditional one and two storey residential properties along the High Street, with more recent development on the perimeters of the settlement. The proposed development has a mix of one and two storey residential units located in detached and semi-detached properties. They are to be accessed off an access road running north-south, together with two minor cul-de-sacs roads, with properties orientated towards the highway.
- 4.2 The site is bordered to the east by gently sloping agricultural land and, as such, any development here would not be conspicuous from this direction, albeit it would be visible from residential properties in the immediate vicinity to the north and south, and to the west across the lane. The western boundary of the site, however, is bordered by an existing hedgebank that runs north-south for approximately 130 metres and extensive views are afforded into the site from the adjoining minor rural road. The proposals ensure that the existing hedgebank is preserved and enhanced in order to limit the visual impact.
- 4.3 The **appearance** of the development as a whole has been sensitively considered and agreed by the Authority, to ensure that there are no detrimental effects of the development on the character and appearance of the conservation area. Typically, the external materials have been chosen to match the type and styles of the varied settlement patterns. There has been great consideration of a neutral pallet of materials to form a sympathetic foil to the traditional buildings adjacent, which in turn will enhance the character and appearance of the Area.
- 4.4 The following images indicate the proposed house type and site feature designs across the development:



Typical 5P3B semi-detached houses. The form is traditional to compliment the context of the surrounding area. Modern materials and colours provide a strong identity. The introduction of window bars and brick headers, echo the designs of the surrounding properties.



A 2P1B detached bungalows, shown above, is located in the northern part of the site plan.



2P1B flats – A chimney has been introduced to break up the long ridge line:



5P3B & 4P2B Semi-detached Houses – The building form allows for good surveillance/security looking across to the open space at the site entrance.



Typical 4P2B semi-detached houses. Ground levels have been graded to minimise the use of retaining walls. The ground can be utilised for landscaping to enhance the internal site aesthetics.



5P3B & 4P2B Semi-detached Houses – The building form allows for good surveillance/security looking across to the parking area at the end of the turning head.

- 4.5 The main consideration for the overall **scale of development** was the effective buildability of the proposed site. This is to ensure that the units can be successfully delivered for affordable housing, in addressing the site constraints imposed such as site levels, ecological mitigation & designing to legislative requirements which includes infrastructure to adoptable standards, Lifetime Homes, and Welsh Development Quality Requirements (WDQR 2021) issued by Welsh Government in order to qualify for government funding for social housing. As stated within the initial assessment of the advice given, Policy GN 26 (Residential Development) states, inter alia, that new homes on sites of 0.10 hectares and above will be built at a density of at least 25 dwellings per hectare, rising to at least 30 dwellings per hectare on sites in towns. It adds that in exceptional circumstances evidence of infrastructure or physical constraints may justify a lower density.
- 4.6 Policy GN.26 (Residential Development) states, inter alia, that new homes on sites of 0.10 hectares and above will be built at a density of at least 25 dwellings per hectare. The site area is 0.83 hectares (2.10 acres) and thus, with 23 units proposed, this would equate to a density of approximately 25 units per hectare. This is in accord with the density required by policy GN.26.
- 4.7 With respect to the affordable housing units, the scale of each unit has been designed to meet the notional floor areas as set out in Annex D of Welsh Government Guidance of Acceptable Cost Guidance/On-Costs for use with Social Housing Grant Funded Housing in Wales.

Unit Type	Floor Area – M2
2 person 1 bedroom bungalow	51
2 person 1 bedroom walk-up flats	54
4 person 2 bedroom house	83
5 person 3 bedroom house	94



NOTIONAL FLOOR AREAS (NFAs)

Indicative site section A-A

1. Notional Floor Areas are provided as guidance on the expected floor areas that would be achieved if Welsh Development Quality Requirements (WDQR 2021) were implemented in full for each house or flat type listed.
2. NFAs are not a minimum size as the main criterion should be all designs comply with WDQR and not merely achieve a notional floor area. House or flat designs with full WDQR compliance can be achieved with floor areas below the notional figures.
3. However, the Welsh Government may consider designs significantly larger than the NFAs as not representing value for money. In such instances if an RSL cannot provide a suitable justification for the significant over-sizing then the SHG input may be capped.

- 4.8 The **amount** of accommodation provided by the completed development will include the following:

1. 1 No x 2 person 1 bedroom bungalow
2. 4 No x 2 person 1 bedroom walk-up flats
3. 12 No x 4 person 2 bedroom houses
4. 6 No x 5 person 3 bedroom houses

- 4.9 The unit mix has been prepared by Tai Wales & West Housing based on a need in the immediate area. Tai Wales & West Housing will be operating this development on a choice based letting policy which will ensure people on the housing register with immediate links to Pembrokeshire having priority.

5.0 Design Evolution

5.1 The following plans and text describe a brief design sequence:



5.2 Pre-Application Enquiry: The above layout was issued to PCC Planning & Highways departments. The comments received were favorable. Both the principle of developing this parcel of land as an 'exception site' along with utilising the existing estate road for the proposed site access, we agreed upon.

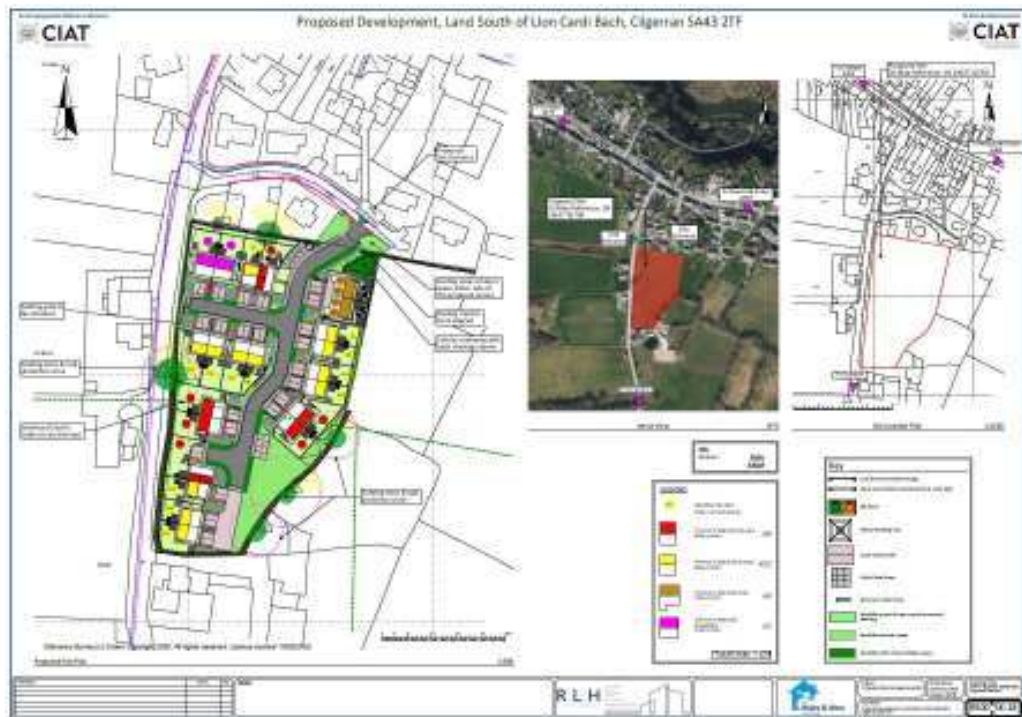
5.3 Following the receipt of detailed Topographic site survey and ground investigation works, the engineers provided the sketch below which highlight the preferred SUDs strategy along with some minor design changes to the highway and layout.



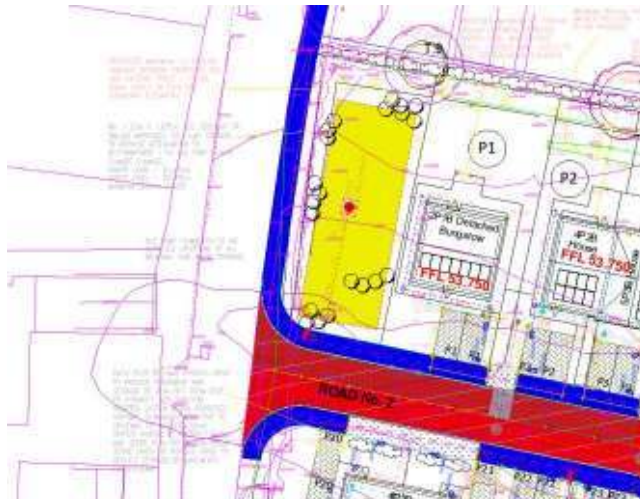
The following changes were suggested:

- The reduced turning head on the initial cul-de-sac to be removed.
- Cellular soakaway/SUDs basin at site entrance.
- Minor adjustment to the road alignment with the existing highway at Llon Cardi Bach.
- Drainage 'depressions' to be used in place of some highway footpath to assist with SUDs strategy.

- 5.4 Following receipt of the engineer's mark-up above, along with further discussions with the client on the proposed unit mix, the layout was revised and the following, updated proposed plan for the site was issued.
- 5.5 Along with the engineering updates as noted above, the changes to unit mix related to the front of the site. These included:
1. Replacing the 2P1B semi-detached bungalows (plots 5 & 6) with 4 no. 2P1B flats.
 2. Replacing the 3P2B semi-detached bungalows (plots 1 & 2) with 2P1B semi-detached bungalows.



- 5.6 The proposed site plan above indicated a development of 24 units. However, following further revision by engineers, it has been advised that larger space is required for attenuation tank. Thus, the scheme was reduced from 24 units to 23 total no. of units.



- 5.7 The site masterplan below indicates a development of **23 units**. The site plan has been adjusted from 24 units to 23 by amending semi-detached bungalow to the detached bungalow type to make space on the proposed site for the attenuation tank. The site entrance has been relocated directly off the highway with a pedestrian link to Llon Cardi Bach. A pedestrian link has also been introduced to the west to link with the sports club.

This is to be considered as 'Concept Site plan' for planning.



- 5.8 In terms of **landscaping**, much of the site is open grass land, which is bound by mature trees and hedgerows. All the existing established boundaries are to remain. There are number of trees that are identified as being retained with root protection areas in place, which excludes any development from taking place up to those areas shown. Enhancements will be made by means of further tree planting.
- 5.9 A tree and hedgerow survey/report has been carried out by the Arb Team.
- 5.10 The proposed development offers the opportunity of pockets of green open areas along the main road of the proposed development site. Low maintenance shrubs and tree planting can be carried out to further enhance the sites distinctiveness. As part of the planning application a landscape masterplan by RDS Landscaping is being submitted to support the application.

6.0 COMMUNITY SAFETY

- 6.1 The development is designed to protect property by allowing for natural surveillance; improving the community's and individual's safety by reducing conflicts in uses; and promoting a sense of ownership and responsibility. Boundary walls and fences define the property line with the rear garden being enclosed.

- 6.2 'Dusk til Dawn' security lighting will be fitted to the front and rear accesses. The windows on the front elevation will provide natural surveillance to the parking area located at the front of the property. Windows will be fitted with locks and doors and will have 5 lever mortise locking systems.
- 6.3 In addition to the above the development as a whole is aiming to achieve and meet the requirements of Secure by Design (SBD) – Gold. Secured by Design works with the industry and test houses to create high level security standards, responding to trends in crime, and has given input on a number of key standards. The principles of the scheme have been proven to reduce the risk of crime and the fear of crime which is incorporated within the proposed development.

Secure by Design certification must be met in order for Tai Wales & West Housing to meet the Welsh Government's criteria to draw Social Housing Grant (SHG) for the proposed scheme.

7.0 ENVIRONMENTAL SUSTAINABILITY

Objectives –

- Achieve efficient use of protection of natural resources
- Enhancing biodiversity
- Designing for change

Achieve efficient use of protection of natural resources, Energy efficiency/carbon reduction, Waste Management

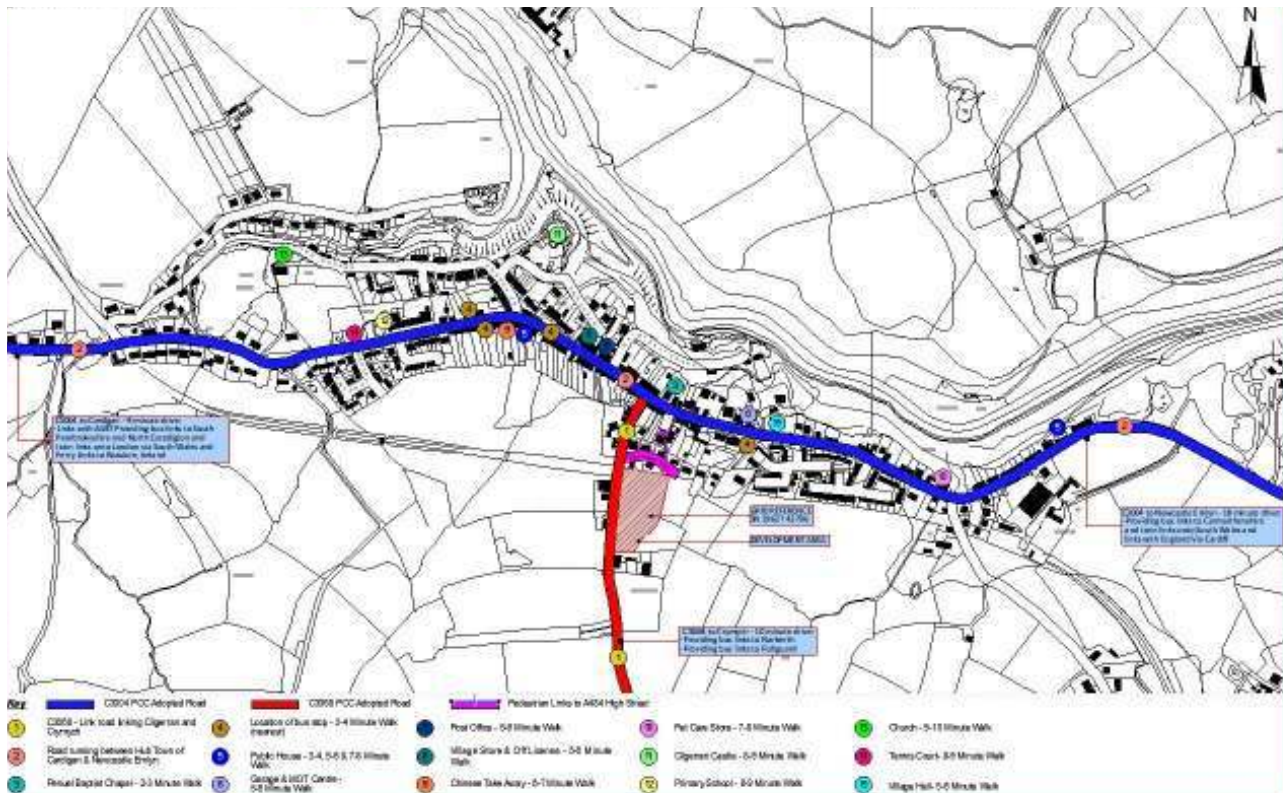
- 7.1 **Energy:** The buildings will be very well insulated and designed to achieve EPC A and comply with guidance set out in Approved Document L1A of the Building Regulations (2022 edition incorporating 2024 amendments For use in Wales*).
- 7.2 Renewable energy sources will be considered in addition to a fabric first approach. It is proposed to use air source heat pumps with solar pv to ensure the required improvement of the dwelling emission rate (DER). The thermal elements will be very well insulated; windows and doors will be double glazed and air tightness a priority in construction techniques.
- 7.3 **Materials and Resources:** The majority of the building materials will be sourced from suppliers locally. The masonry bricks and blocks forming new cavity walls are generally specified from manufacturers which have Environmental Management Systems (EMS) in place for the key process and/or extraction stages of their product in the form of BES 6001 or ISO 14001 Certification. The fibre cement roof slates are manmade and carry BES 6001/ ISO 14001 Certification and all structural timber and finishing timber elements will come from a legal source where harvesting and all relevant activities are carried out in line with relevant forest management laws and codes of practice.
- 7.4 Windows and doors, although proposed in pvc-u will be specified to have an A Rating under the Green Guide and be sourced from a local supplier whose manufacturer has an Environmental Management System (EMS) in place for the key process and/or extraction stages of their product in the form of ISO 14001 Certification.

- 7.5 **Water Use:** Methods of water restrictions to taps, showers and toilets flushing will be implemented to limit water use to 110 litres/head/day, in accordance with the guidance set out under paragraph 2.3 of Amendment to Approved Document G – Sanitation, hot water safety and water efficiency.
- 7.6 **Enhancing Biodiversity:** Front gardens will be formed to maximise soft landscaping areas. The enclosed section of the rear gardens will exceed 40m² for houses and 30m² for bungalows, which is the minimum garden area for properties of this size, as set out in the Welsh Governments Design Quality Requirements. Future maintenance requirements will be adequately considered, and Tai Wales & West Housing will have management programs in place to ensure the maintenance of communal areas will be properly carried out.
- 7.7 Planting will not impede the opportunity for natural surveillance and will avoid the creation of potential hiding places. As a general recommendation, where good visibility is needed, shrubs will be selected to have a mature growth height no higher than 1 metre, and trees will have no foliage below 2 metres, thereby allowing a 1 metre clear field of vision. Rear gardens will be turfed and planting is likely to be considered which will enhance biodiversity.
- 7.8 An ecological survey has been carried out for the site as a whole, full mitigation measures and enhancements have been included on the drawings as per the Ecologists recommendations. See **Appendix 5** for full report.
- 7.9 **Place and Local Distinctiveness:** The drawings provided illustrate the outline building design and layout of the site, which identifies the proposed scale and mass associated with the development. Materials have been considered under Materials and Resources and are intended to be sympathetic to the site's environment.
- 8.1 **Robust Building "Designing for Change":** The buildings will be designed for 'long life' and to cope with climate change, which predicts more severe weather events. The slate roofs laid at a suitable pitch along with the masonry walls ensure the buildings will be robust to the harsh and exposed environment that comes with the site's geographical location.
- 8.2 The buildings have been designed taking account and consideration of the 16 features identified by the Lifetime Homes Standards. Parking will be provided immediately adjacent to the principle entrance. Entrances will be illuminated and have a level access threshold, which are covered. All internal doors will have a structural opening size of 912mm to accommodate 2'9" doors throughout. Switches, sockets, ventilation and service controls will be at a height between 450mm and 1200mm from the floor, suitable for use by all.

9.0 MOVEMENT TO, FROM AND WITHIN THE DEVELOPEMNT

- 9.1 Cilgerran is well served with good transport links to the main towns and surrounding areas. The nearest bus stop to the site is located on the High Street. Regular buses services run from these stops 6/7 days a week.
- 9.2 Although the site sits to the south edge of Cilgerran, it is still within proximity to several local facilities that sit to the northeast and northwest. This includes the following:
1. C3068 Link road between Cilgerran and Crymych
 2. C3004 Link road to Cardigan and Newcastle Emlyn
 3. Penuel Baptist Chapel, approximately 2-3 minutes' walk

4. Bus stops, nearest to site is approximately 3-4 minutes' walk
5. Public House(s), approximately 3-8 minutes' walk
6. Garage & MOT centre, approximately 5-6 minutes' walk
7. Post Office, approximately 5-6 minutes' walk
8. Village Store & Off-license, approximately 5-6 minutes' walk
9. Chinese take-away, approximately 6-7 minutes' walk
10. Pet Care Store, approximately 7-8 minutes' walk
11. Cilgerran Castle, approximately 8-9 minutes' walk
12. Primary School, approximately 8-9 minutes' walk
13. Church, approximately 9-10 minutes' walk
14. Tennis Court, approximately 8-9 minutes' walk
15. Village Hall, approximately 5-6 minutes' walk



The above plan identifies that movement to, from and within the site can be achieved sustainably and promotes good active travel to a number of key facilities that Cilgerran has to offer.

- 9.3 The accommodation and immediate surroundings will achieve disabled access in compliance with guidance set out in Approved Document M of the Building Regulations.
- 9.4 The buildings will benefit from a hard standing adjacent to the principle entrance which will provide disabled access in tandem with a vehicle parking facility.
- 9.5 Parking bays will be finished in a firm and even finish and will lead to a minimum 900mm wide concrete path to the full perimeter of the building, providing a firm and even finish to the principle entrance.
- 9.6 The principle entrances will be served by a ramp which will have an unobstructed width of at least 900mm, have individual flights no longer than 10m for gradients not steeper than 1:15, or 5m for gradients not steeper than 1:12 and will have top and bottom landings and, if necessary,

intermediate landings, each of whose lengths is no less than 1.2m, exclusive of any door or gate which opens on to it.

- 9.7 An accessible threshold will be provided at the principal entrance doors, by means of an approved proprietary threshold system not exceeding 15mm above finished ground/ floor level. All surfaces will be firm and even.

10.0 OTHER MATTERS

- 10.1 **Land Contamination** – The land to which the application relates to is not known to be contaminated.
- 10.2 A Geotechnical and Geoenvironmental Site Investigation Survey was carried out by Terraforma on behalf of the applicants. The report was conducted in accordance with DEFRA and the Environment Agency's Model Procedures for the Management of Land Contamination, CLR 11' and Welsh Local Government Associations 'Land Contamination: A guide for developer's guidance note.
- 10.3 The full report which includes findings, conclusions & recommendations has been submitted with the application.
- 10.4 **Drainage & Sustainable Drainage System** - From 7th January 2019, all new developments of more than 1 property or where the construction area that has drainage implications is 100 square meters 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.
- 10.5 Please refer to supporting engineering information as per their attached drawing issue register, which accompanies this application.

11.0 CONCLUSION

- 11.1 The proposed development will provide suitable affordable housing in Cilgerran, while the overall scheme design is aimed at portraying a modern, environmentally sustainable development, which enhances the streetscape, whilst sitting well within the location.
- 11.2 The development itself will go some way to assisting local businesses, tradesmen, contractors and consultants during the construction period. Thereafter, new families will contribute to the local economy and community.
- 11.3 This Design and Access Statement has explained and justified the design process in compliance with Technical Advice Note (TAN) 12. This demonstrates how the proposals can be accommodated within the site sympathetically to its surrounding environment, in accordance with Policies SP1, SP 9, SP12, SP13, SP14, GN1, 2, 3, 26, 27, 28 & 37 of the LDP for Pembrokeshire County Council.

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Ceri Jones

Dear Rob

Land at Llon Cardi Bach, Cilgerran, Pembrokeshire SA43 2TF
Development of the site for affordable housing
Council reference no. PR/0085/20

Thank you for your enquiry dated 1 July 2020 and I apologise for the delay in responding to you.

You have suggested developing 24 affordable residential units with access, parking and landscaping areas on an agricultural field immediately adjoining the south eastern urban area of Cilgerran. You have also attached correspondence which suggests that the site may be developed by Wales and West Housing Association.

You refer to developing up to 24 affordable residential units on your supporting letter dated 01 July 2020 but all other supporting information relates to 22 units. The commentary below is based on the Proposed Site Plan (drawing no. R500 SK-03A) which shows a development of 22 residential units.

The Proposed Site Plan indicates that the site would be developed as a cul-de-sac serving 22 properties along a north-south access road, with two minor access roads off this to the south and west. The access would be from the north, off a minor residential road known as Llon Cardi Bach, albeit that it is also indicated that access could come from the west off the minor adjoining rural lane.

The development of affordable rented housing would consist of the following:

- 2 no. 1 bedroom bungalows

- 2 no. 2 bedroom bungalows
- 12 no. 2 bedroom houses
- 6 no. 3 bedroom houses

All of the properties would be semi-detached and they would be orientated towards the access road or two minor cul-de-sacs. To date, however, you have not provided any plans and elevations of the proposed housing.

Each property would have its own dedicated parking area and curtilage, and there would be a small area to the south east to accommodate a pumping station and easement. There would be very limited landscaping and no open spaces as such but there would be a 2 metre wide ecological buffer around the site, which would be 5 metres wide to the south west.

There are no details at present with regard to service provisions, such as foul and surface water drainage.

The site

The site is a triangular flat area of land immediately adjoining Cilgerran and covers approximately 0.83 hectares (2.10 acres). Existing residential development to the north consists of modern single storey detached houses whilst to the west, beyond the adjoining lane, and south are detached traditional two storey residential properties. To the south west, again beyond the adjoining lane, is a football playing field whilst to the north west and east is flat agricultural land. There appear to be several large mature trees in the hedgerows immediately adjoining site.

You have also supplied a site services and constraints plan (drawing no. R500 SK-02A) which identifies a 2 metre wide ecological buffer around the site (with a smaller 5 metre wide ecological buffer zone to the south west), and an overhead electric cables crossing the site east-west across the south of the site and along the eastern boundary. You have also provided information from Dŵr Cymru Welsh Water with regard to water supply, Natural Resources Wales with regard to flooding and Western Power Distribution with regard to overhead lines and electricity supply.

Planning history

There is no planning history for the site from the recent past.

Planning policy context

The Local Development Plan (LDP) for Pembrokeshire was adopted in February 2013. The relevant policies are as follows:

SP 1 Sustainable Development
SP 9 Welsh Language
SP 12 The Settlement Hierarchy
SP 13 Settlement Boundaries
SP 15 Rural Settlements
SP 16 The Countryside
GN.1 General Development Policy
GN.2 Sustainable Design
GN.3 Infrastructure and New Development
GN.26 Residential Development
GN.29 Exception Sites for Local Needs Affordable Housing
GN.37 Protection and Enhancement of Biodiversity

The site is not allocated for any site-specific land uses in the proposals map that accompanies the LDP but it is shown as immediately adjoining the settlement boundary for Cilgerran.

The LDP, and the policies contained therein, is available on the Council's website at www.pembrokeshire.gov.uk.

The Council is currently reviewing the LDP. The new Plan, LDP2, reached the Deposit stage earlier this year and full draft of the new Plan was made available for public consultation from 15 January 2020 to 18 March 2020. In response to the current Covid-19 pandemic and Welsh Government guidance, the local planning authority is reviewing the evidence base and timetable for the emerging LDP2. It is hoped that a Focussed Change consultation will be open for further comments in the winter of 2020/2021 with a revised Delivery Agreement for LDP2 in place by the Spring of 2021, although these dates may be subject to change in the current uncertainties. The current LDP will remain in force until LDP2 is adopted or until 31 December 2021, whichever is the sooner.

Supplementary Planning Guidance

The following Supplementary Planning Guidance (SPG) would be given due consideration in the evaluation of any planning application:

Affordable Housing (came into force 14 September 2015)
Parking Standards (came into force 28 June 2013)
Planning Obligations (adopted 12 September 2016)

Any material considerations

It is considered that there are no material considerations over and above those discussed below.

Initial assessment of the proposal

Principle of Development

Policy SP 1 (Sustainable Development) states that all development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised.

The positive social impacts would be the provision of additional affordable housing in the County and the site's development would have positive economic impacts during the construction period. There would be environmental impacts associated with the development and these are discussed below. The proposed development would need to demonstrate that adverse impacts would be minimised to be in accord with policy SP 1.

Policies SP 12 (The Settlement Hierarchy) and SP 13 (Settlement Boundaries) identify Cilgerran as a Rural Settlement Service Village in the settlement hierarchy and settlement boundaries define the areas within which development opportunities may be appropriate.

The site is outside the settlement limit of Cilgerran and in the countryside. Policy SP 16 (The Countryside) states, inter alia, that the essential requirements of people who live and work in the countryside will be met whilst protecting the landscape and natural and built environment. The development would allow a Rural Settlement to expand and meet the needs of people who live and work in a rural area, and it would have a limited visual impact.

Policy GN.29 (Exception Sites for Local Needs Affordable Housing) allows for local needs affordable housing on land that would not otherwise be released for housing in exceptional circumstances. The criteria for these exceptional circumstances are:

1. *The site is within or immediately adjoining a settlement boundary.* The proposed site adjoins the settlement boundary for Cilgerran and thus complies with this criterion.

2. *A local need for affordable housing has been identified.* The County Council produced a Local Housing Marketing Assessment in 2014, which is currently under review. This identified an annual need, in particular for one and two bedroom affordable rented properties, in the Cilgerran Community Council area:

- 8.3 one bedroom affordable rented properties
- 6.9 one bedroom low cost home owner properties
- 2.9 two bedroom affordable rented properties
- 0.9 three bedroom or more affordable rented properties

In your proposal, you have suggested 2 no. 1 bedroom bungalows, 14 no. 2 bedroom bungalows and houses, and 6 no. 3 bedroom houses. This is broadly acceptable but it would be appropriate to increase the number of one bedroom properties accordingly, having regard to the demand identified in the Local Housing Marketing Assessment. You would also need to include evidence of need in an Affordable Housing Statement in support of any planning application, as the local planning authority will require evidence that there is housing need above the levels that would be delivered by extant planning permissions anticipated to be provided by housing allocations within the local area and through a Registered Social Landlord (RSL) programmed schemes.

3 *The community in which the site is located is adequately served with facilities to support the proposed development.* The community in which the site is located is adequately served with facilities to support the proposed development, being a Rural Settlement Service Village as defined by Policy SP 12 (The Settlement Hierarchy).

4 *All the benefits of the affordable housing provision pass to the initial and all subsequent occupants.* As the development would be carried out by a Housing Association it is expected that all the benefits of affordable housing built for the exclusive occupation of local people will pass to the initial and subsequent occupiers. The local planning authority's SPG on Affordable Housing states that exception sites will only be permitted for social or intermediate rented properties and defines the local area as the Community Council and adjoining Community Council areas (for rural areas).

As such, in compliance with the above, it is considered that the proposal would accord with the requirements of policy GN.29.

Residential density

Policy GN.26 (Residential Development) states, inter alia, that new homes on sites of 0.10 hectares and above will be built at a density of at least 25 dwellings per hectare. The site area is 0.83 hectares (2.10 acres) and thus, with 22 units proposed, this would equate to a density of approximately 26 units per hectare. This is in accord with the density required by policy GN.26.

The character of the site and the area

Policy GN.1 (General Development Policy) contains a number of criteria to evaluate applications. Criterion (1) states that development will be permitted where the scale of the proposed development is compatible with the capacity of the site and the area within which it is located.

Cilgerran is characterised by traditional two storey residential properties along the High Street, with more recent development on the perimeters of the settlement. Your

proposed scheme has a mix of one and two storey residential units located in semi-detached properties. They would be accessed off an access road running north-south, together with two minor cul-de-sacs roads, with properties orientated towards the highway. Whilst you have not submitted any plans or elevations to date, your proposed development would be commensurate in nature and scale with other more modern residential development nearby in the village.

The site is bordered to the east by flat agricultural land and, as such, any development here would not be conspicuous from this direction, albeit it would be visible from residential properties in the immediate vicinity to the north and south, and to the west across the lane. The western boundary of the site, however, is bordered by an existing hedgebank that runs north-south for approximately 130 metres and extensive views are afforded into the site from the adjoining minor rural road. Any development, therefore, would need to ensure that the existing hedgebank is preserved and enhanced in order to limit the visual impact. Notwithstanding this, having regard to the flat topography of the immediate area, the nature of the highway network here and the type of development in the vicinity, the proposed development would not be conspicuous. In addition, the indicative layout appears to demonstrate that adequate separation would be maintained from existing dwellings in the vicinity and that acceptable levels of amenity can be provided. As such, it is considered that the proposal would accord with the character of the site and the area within which it is located.

Criteria (5) and (6) of policy GN.1 concern, amongst other things, accessibility and parking provision. Mike Harries, the Highways Planning Liaison Officer, does not object to the scheme subject to pedestrian accessibility and connectivity issues. I would note that you have indicated that the access would be from the north but that an alternative access could be created from the west. This latter option would be a more rational use of land and would free up land to the north east which could accommodate additional units.

Landscaping would be a key element of the scheme but your scheme has very limited planting indicated. You may be able to accommodate additional planting, for example along the access road adjoining plot 4 and plot 22 and, where possible, you could increase the area between the proposed parking spaces to accommodate further planting.

I would note that the access road contains significant areas of hardstanding, with pavements on both side of the access road throughout and adjoining the two turning heads. This could be reduced by having a pavement on one side only by the immediate entrance to the site and by increasing the areas of shared surfaces, which should be achievable having regard to the limited amount of housing proposed. These minor changes would also release additional land that could be used for increased landscaping measures.

Subject to suitable highway and landscaping details, it is considered that the development has been designed in a manner that would be compatible with the character of the site.

Design

Policy GN.2 (Sustainable Design) and states, amongst other things, that development will be permitted where it is of good design and pays due regard to local distinctiveness and it is appropriate to the local character. At present, we do not have any plans and elevations for the proposed residential units but we would be happy to comment on these accordingly.

Planning obligations

Policy GN.3 (Infrastructure and New Development) and states, inter alia, that development should fund any directly related need for new or improved infrastructure. Having regard to the fact that the proposal would be for affordable housing, however, it is not considered appropriate to require other infrastructure contributions in conjunction with the scheme.

Welsh language

The site immediately adjoins Cilgerran, which had a significant Welsh-speaking population of 53% according to the 2011 Census. Technical Advice Note 20 on Planning and the Welsh language (TAN 20) (October 2013) states that in determining individual applications where the needs and interests of the Welsh language may be a material consideration, decisions must be based on planning grounds only and be reasonable (paragraph 4.1.2). Policy SP 9 (Welsh Language) states that development will be managed sensitively where the Welsh language has a significant role in the local community. This may include phasing, signage and / or other appropriate mitigation measures.

Having regard to the size of the application site, the strength of the Welsh language locally and the site's proposed development for affordable housing, it is not considered that the development would have a significant detrimental linguistic impact. It would not be appropriate that a phased approach to development is undertaken having regard to the limited number of dwellings proposed. As such, it is considered that the proposal would accord with the requirements of policy SP9 and TAN 20.

Other matters

With regard to water provision, drainage and electricity provision, there are no obvious constraints to development. Similarly, there are no known issues of archaeological or historic importance associated with the site.

You should, however, have regard to the need for a Sustainable Urban Drainage Approval Body (SAB) consent. You are advised to discuss this matter accordingly in case the layout needs to be altered.

You have indicated that there would be an ecological buffer zone along the boundaries of the site and that mature trees and hedges are to remain. Any ecological, arboricultural or landscape interests here need to be identified in suitable supporting surveys and appropriate mitigation suggested.

Additional information

It is open to you with regard to submitting an application for outline planning permission or for full planning permission.

You would, however, be required to undertake pre-application consultation prior to the submission of any application, in accordance with Article 1 of the Town and Country Planning (Development Management Procedure (Wales) (Amendment) Order 2016 as the development is for more than 10 dwelling houses.

Should you wish to proceed with the proposal, the following information would be required to validate an application:

- An application form;
- Completed owner certificate on the application form;
- Completion of the agricultural holding certificate;
- A site location plan (at a scale of 1:1250 or 1:2500) with the site edged red and any adjoining land in ownership or control of the applicant edged in blue;
- Elevations, floor plans and cross sections, as appropriate, at a recognised scale; and
- A Design and Access Statement.

The fees for any application would depend on whether the application is for outline or full planning permission. On the assumption that an application is submitted for 22 dwellings on a site area of 0.83 hectares:

The outline fee is calculated by the site area

Less than 2.5 hectares = £460.00 for each 0.1 hectares or part thereof

0.83 hectares = £4,140.00 (£460 x 9) = Fee for outline planning application = £4,140.00

The reserved matters fee is calculated by the number of dwellings

Less than 50 dwellings = £460.00 per dwelling

22 dwellings = £10,120.00 (22 x £460) = Fee for reserved matters application (assuming only one such application) = £10,120.00

Total planning fee = £14,260.00

The fee for an application for full planning permission is calculated by the number of dwellings

Less than 50 dwellings = £460.00 per dwelling

22 dwellings = £10,120.00 (23 x £460)

Total planning fee £10,120.00

Any application would not need to be determined by the local planning authority's Planning Committee, due to the size of the site and the number of units proposed, and could be dealt with by officers as a delegated item.

The above comments represent informal advice from an officer of the Council made without prejudice to the final determination of any planning application.

Yours sincerely

Ceri Jones

Ceri Jones

Area Team Leader, Pembrokeshire North

From: Harris, Mike <Mike.Harris@pembrokeshire.gov.uk>
Sent: 20 July 2020 14:40
To: Rob
Subject: FW: Pre-Application Enquiry: PR/0085/20 - Land at Llon Cardi Bach, Cilgerran, Pembrokeshire, SA43 2TF

Rob,

I can confirm that the vehicle access, Llon Cardi Bach can now be accepted for the proposal. The carriageway width is 5 metres, there are no obvious defects, and it is not too windy. Each existing dwelling appears to have enough off-street parking, so no need to fill the street with parked cars. Whilst there is no footway, or declared margin, on the south side, as there is an alternative means of achieving safe pedestrian connectivity to the village then there is no requirement to create a footway on the south.

I can confirm again that achieving the footway link through to the village is an important aspect. There are defects to the surfacing of this footway, as also to the carriageway, including dips and raised manholes and kerbs out. It seems to have been forgotten about. There needs to be a commitment to repairing this so that it is safe, and there should be a Planning condition to ensure this. Works would not be wasted as they could be an important step towards making up enough of this cul-de-sac for full adoption as Public Highway.

Mike Harris,
Highways Planning Liaison Officer / Swyddog Cyswllt Cynllunio Priffyrdd
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