

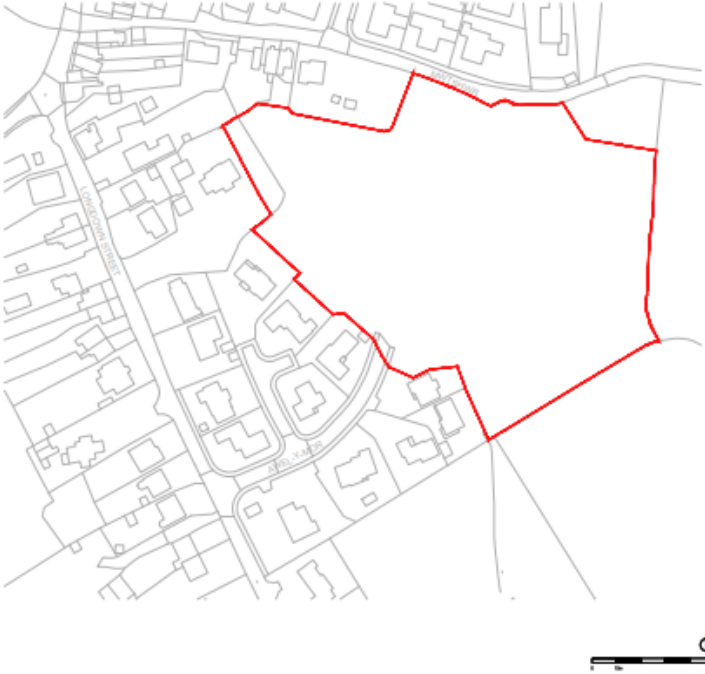
# Planning Statement

Land off Longdown Street  
St Dogmaels

April 2023

amity  
planning consultants



Introduction	
Client	This statement has been prepared on behalf of Obsidian Homes Ltd.
Scope	This statement accompanies the full planning application for residential development of 29 dwellinghouses together with associated works including landscaping scheme, ecology strategy and drainage at land off Longdown Street, St Dogmaels.
Site Details	
Site Address	Land off Longdown Street, St Dogmaels.
Site Location	<p data-bbox="304 667 536 696"><i>Fig.1 Application Site</i></p> 
Site Description	<p data-bbox="304 1464 1538 1711">The Site comprises of approximately 4.13 acres of agricultural land situated towards the south-east of the settlement of St. Dogmaels. The Site is enclosed to the north-west and south-west by existing residential development. To the north-east the Site is bounded by a narrow, dead-end lane called Mwtshwr. To the east and south-east the Site adjoins field parcels which appear to be in agricultural use. An existing adopted hammerhead in the Awel-Y-Mor estate provides vehicular and pedestrian access to the southern Site boundary. This hammerhead was designed to serve the Site as an intended second phase of the Awel-Y-Mor estate.</p> <p data-bbox="304 1749 1538 1921">The Site falls steeply from the Awel-Y-Mor estate to the south to Mwtshwr to the north and is dominated by rough grassland and scattered scrub. There are areas of semi-natural broad-leaved trees and mature hedgerows along the eastern and northern boundaries of the Site. The Site also contains existing private drainage infrastructure, including pipes and a tank, installed as part of the Awel-Y-Mor estate but which has not been adopted by DCWW.</p>

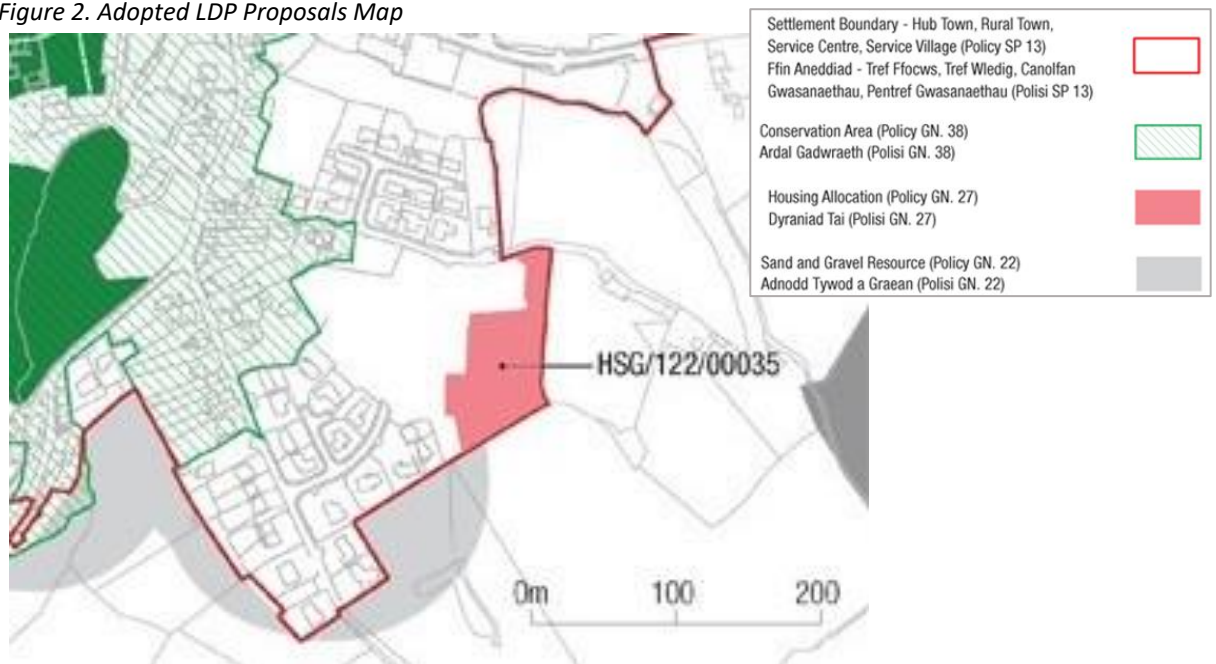
St. Dogmaels is located approximately one mile west of Cardigan, downstream along the River Teifi. The Site lies within walking distance of a range of services and facilities in St Dogmaels village, including convenience shopping, food and drink outlets and a primary school, whilst the nearby market town of Cardigan offers a wider range of services and facilities including supermarkets, leisure facilities and a secondary school.

### Relevant Planning Policy

### Development Plan

In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, development must be carried out in accordance with the development plan unless material considerations indicate otherwise.

Figure 2. Adopted LDP Proposals Map



Following the requirement of the Planning and Compulsory Purchase Act 2004 and the Local Development Plan (LDP) Regulations 2005, Pembrokeshire County Council prepared this LDP for its administrative area and was finally adopted on 28th February 2013. While a Revised LDP is currently being prepared for the period 2018-2033, the Adopted LDP is still in force.

Pembrokeshire County Council Local Development Plan (LDP) sets out the spatial vision for the future of Pembrokeshire (excluding the area within the remit of Pembrokeshire Coast National Park Authority) and a framework for the distribution and delivery of growth and development. It sets out land-use planning policies and proposals which are used in the determination of planning applications and in guiding future opportunities for investment and growth.

The Adopted LDP contains the Proposals Map which shows the policy designations across Carmarthenshire.

In accordance with the LDP Proposals Map, the site and its context have the following designations:

- Settlement boundary for St. Dogmaels (Policy SP13)
- Housing Allocation, Site Ref: HSG/122/00035 (Policy GN 22)
- Conservation Area of St Dogmaels (Policy GN 38)
- Sand and Gravel Resource (Policy GN 22)

The site is within the settlement boundary for St. Dogmaels. The eastern area of the site appears subject to housing allocation (Site Ref: HSG/122/00035) whereas most of the land is unallocated.

The residential properties adjoining the norther-western corner of the site are within the Conservation Area of St. Dogmaels. The neighbouring land further south-west is designated as having Sand and Gravel Resource.

The Adopted LPD contains two types of planning policies:

Strategic Policies: they outline the LDP's strategic direction, which together with the spatial and settlement framework and the strategic policies provides the context for detailed, specific policies.

General Policies: they are detailed policies dealing with specific policy areas and providing general development management policies against which all development proposals within Pembrokeshire will be assessed.

Having reviewed the content of all provisions of the LDP, the following policies have been identified as relevant to the development proposals:

#### SP 1 Sustainable Development

In line with Policy SP1, development proposals must demonstrate how positive economic, social, and environmental impacts will be achieved and adverse impacts minimised. Detailed policies such as General Policies GN.1 to GN.4 and GN.33 to GN.38 of the Plan will be critical in ensuring that this Strategic Policy is met.

#### SP 7 Housing Requirement

Provision is made for approximately 7,300 dwellings in the Plan period, to enable delivery of 5,700 dwellings. New homes will be developed mainly on land allocated specifically for housing and in sustainable locations within defined Settlement Boundaries

#### SP 9 Welsh Language

Development will be managed sensitively in areas where the Welsh Language has a significant role in the local community. This may include phasing, signage and / or other appropriate mitigation measures.

This Policy seeks to maintain the County's bilingual distinctiveness and the policy will apply to development proposals in all community councils defined as 'language sensitive'

#### SP 8 Affordable Housing Target

The need for affordable housing in Pembrokeshire is acute across the whole County and is informed by the Common Housing Register, the Pembrokeshire Local Housing Market Assessment (2012) and the Pembrokeshire Housing Strategy. A minimum of 980 new affordable dwellings will be provided.

#### SP 12 The Settlement Hierarchy

A settlement hierarchy is defined on the basis of functional characteristics and availability of services and facilities.

For the purposes of Policy SP 12, St Dogmaels is identified as 'Service Village' able to accommodate a range of development land uses, including windfall market housing.

### SP 13 Settlement Boundaries

Settlement Boundaries are shown for all settlements and define the areas within which development opportunities may be appropriate. Within Small Local Villages, Settlement Boundaries are defined indicating where local needs affordable housing will be permitted. In Hub and Rural Towns, Service Centres and Service Villages Settlement Boundaries define the physical, functional and visual extent of the settlement and take into account proposed allocations. Local Village Settlement Boundaries are defined more tightly, limiting opportunities to small scale infill and rounding off.

### SP 15 Rural Settlements

Within the Rural Settlements development will encourage sustainable communities and a thriving rural economy by promoting:

1. Development of a scale and nature identified as being appropriate for the settlement.
2. High quality accommodation of tenure(s) appropriate for the settlement.
3. Opportunities for new commercial, retail, tourism, leisure and community facilities.
4. Appropriate land uses which are well-related to a Settlement Boundary.
5. Greater accessibility to existing and new services.

### GN.1 General Development Policy

The purpose of this policy is to provide a framework for evaluation of potential development impacts. This will be used in conjunction with other plan policies to determine whether the proposed development is appropriate.

### GN.2 Sustainable Design

This policy aims to ensure that all new development makes a positive contribution to the local character and distinctiveness of the built and natural environment and the communities within Pembrokeshire. Where no strong local characteristics exist then good, contemporary, sustainable design will be appropriate.

### GN.3 Infrastructure and New Development

Where development generates a directly related need for new or improved infrastructure, services or community facilities and this is not already programmed by a service or infrastructure company, then this must be funded by the development.

In the event that viability considerations indicate that not all the identified contributions can reasonably be required, priority contributions will be determined on the basis of the individual circumstances of each case.

### GN.26 Residential Development

Residential development will be permitted where the proposal is for one or more of the following:

1. Open market housing or affordable housing to meet local needs, located within the Settlement Boundary of a Town, Service Centre, Service Village or Large Local Village as defined in the settlement hierarchy;
2. Affordable housing to meet local needs, located within the boundary of a Small Local Village;

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. In exceptional circumstances evidence of infrastructure or physical constraints may justify a lower density.

### GN.27 Residential Allocations

Policy GN.27 depicts land allocated for residential purposes and is supplemented by the 'Development Sites' SPG (2016).

Fig.3 Residential Allocations

Housing Allocations	Site Reference	Minimum number of Units	Area (ha)	Indicative Affordable Housing Requirement
<b>Service Villages (continued)</b>				
Penally - North of The Paddock	HSG/097/LDP/01	8	0.29	25%
Penally - Penally Heights	HSG/097/LDP/02	11	0.56	25%
Pentlepoir - Land adjacent to Coppins Lodge	HSG/099/LDP/01	35	1.68	25%
Puncheston - Opposite Bro Dewi	HSG/108/LDP/01	6	0.39	Up to 5%
Puncheston - West of Awelfa	HSG/108/LDP/02	12	0.44	Up to 5%
Robeston Wathen - South of Robeston Court	HSG/113/LDP/01	14	0.63	25%
Roch - East of Pilgrim's Way	HSG/114/LDP/01	44	2.19	20%
Rosemarket - Opposite The Glades	HSG/116/LDP/01	13	0.5	15%
Sageston - South of the Plough Inn	HSG/015/00022	31	1.27	Up to 5%
Simpson Cross - East of Hill Lane	HSG/119/LDP/01	11	0.54	20%
Spittal - North West of Wesley Way	HSG/120/00018	22	0.87	15%
St Dogmaels - Awel y Mor Extension	HSG/122/00035	16	0.55	Up to 5%
St. Florence - North of Parsons Green	HSG/123/LDP/01	26	1.17	25%
Templeton - South of the B4315	HSG/132/00030	18	1.21	15%
Templeton - South of the Boars Head Junction	HSG/132/LDP/01	28	1.13	15%
Tiers Cross - North of Bulford Road	HSG/135/00004	23	0.91	Up to 5%
Wolfscastle – opposite Haul y fryn	HSG/149/LDP/01	30	1.2	15%
<b>Service Villages Total</b>		<b>887</b>	<b>44.35</b>	
<b>Service Villages Total as percentage of Total allocations</b>		<b>20%</b>	<b>24%</b>	
<b>All Housing Allocations total</b>		<b>4, 556</b>	<b>187.10</b>	

#### GN.28 Local Needs Affordable Housing

The Site lies within the “Service Village” zone. “Local needs affordable housing will be sought on all housing developments. Indicative targets for provision on allocated sites are set out in Policy GN.27, and on unallocated sites the provision shall be as follows:

1. In Towns, Service Centres and Service Villages 10% of dwellings proposed will be affordable.
2. In Large Local Villages 50% of the dwellings proposed will be affordable.
3. In Small Local Villages all new dwellings must be affordable.”

#### GN.37 Protection and Enhancement of Biodiversity

All development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity. Development that would disturb or otherwise harm protected species or their habitats, or the integrity of other habitats, sites or features of importance to wildlife and individual species, will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures.

Future Wales:  
The National  
Plan 2040

#### Future Wales – the National Plan 2040

It is the national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and



climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

As described above, the Welsh development framework has been designed incorporating the principles of sustainable development at its core. This comes as a result of the Well-being of Future Generations (Wales) Act 2015 ('the Act') that gives a legally-binding common purpose – the seven well-being goals – to the public sector to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals.

In a more detailed level, the National Plan contains 18 strategic and spatial policies. In view of the nature of the development proposals, the policies below have been identified as relevant to the scheme:

- Policy 1 – Where Wales will grow
- Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking
- Policy 7 – Delivering Affordable Homes
- Policy 8 – Flooding
- Policy 9 – Resilient Ecological Networks and Green Infrastructure
- Policy 11 – National Connectivity
- Policy 12 – Regional Connectivity

Figure 4. The Seven Goals of the Well-being of Future Generations (Wales) Act 2015



Planning Policy Wales

**Planning Policy Wales (11th Edition, February 2021)**

Planning Policy Wales (PPW) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions.

Paragraph 2.8 acknowledges that “planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales” and “the most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making planning policy and decision making”.

As per Paragraph 2.9.PPW defines placemaking as a “holistic approach to the planning and design of development and spaces, focused on positive outcomes”. This approach “considers the context, function and relationships between a development site and its wider surroundings” and “adds social, economic, environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary”.

Figure 5. PPW Themes Collectively Contribute to Placemaking (extract from PPW Edition 11)



In light of the nature of the development proposals and their location, the following themes and policy topic areas are identified as relevant.

### 1. STRATEGIC & SPATIAL CHOICES

Effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the development of specific proposals, or when formulating a development plan.

#### Good design

Good design is one of these fundamental choices to creating sustainable places where people want to live, work and socialise. PPW 11 sets out five key aspects of good design which are essential to make placemaking happen:

#### 1) Access and Inclusivity

This can be achieved “making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children” (Paragraph 3.6) and through measures and features that “enable easy access to services by walking, cycling and public transport” and “encourage people to meet and interact with each other”.

#### 2) Environmental Sustainability

Paragraph 3.7 states that “developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement (Paragraph 3.7)” and be resilient through “an integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, the adaptability of buildings and site treatment”

Paragraph 3.8 highlights that “landscape and green infrastructure considerations are an integral part of the design process” and, in a similar manner, addressing land contamination, instability and flood risk and providing for biodiversity benefits should be part of the design.



### 3) Character

Paragraph 3.9 highlights that “the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations”. It goes on to say that “the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials” will be particularly important in areas recognised for their particular landscape, townscape, cultural or historic character and value.

### 4) Community Safety

Paragraph 3.11 establishes that “crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions”

### 5) Movement

Paragraph 3.12 states that good design in this matter means “minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys”. It also remarks that “existing infrastructure must be utilised and maximised, wherever possible”.

### Previously Developed Land

Paragraph 3.55 emphasises the preference of previously developed land as opposed to greenfield sites. It advises that “previously developed (also referred to as brownfield) land [...] should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome”.

The PPW definition of previously developed land is land “which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure”.

## **2. ACTIVE & SOCIAL PLACES**

### Transport

Paragraph 4.1.11 sets out that “development proposals must seek to maximise accessibility by walking, cycling, and public transport, by prioritising the provision of appropriate on-site”. In this respect, “the sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications” as per Paragraph 4.1.14. The Welsh Government policies set out the sustainable transport hierarchy which is, in this order, from walking and cycling, public transport, ultra-low emissions vehicles to other private motor vehicles.

Active travel is a cornerstone of the transport policies in Wales. Paragraph 4.1.31 confirms that “planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling”.

With regards to vehicle parking, Paragraph 4.1.50 advises that a design-led approach should ensure that “appropriate level of car parking is integrated in a way which does not dominate the development”. Paragraph 4.1.35 requires new development to “provide appropriate levels of secure, integrated, convenient and accessible cycle parking”.

### Housing

Paragraph 4.2.1 advises that “new housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of

	<p>identified housing needs and contribute to the development of sustainable and cohesive communities”.</p> <p>Paragraph 4.2.17 acknowledges the potential on brownfield sites to deliver further housing when saying that “maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites”.</p> <p><b>3. DISTINCTIVE &amp; NATURAL PLACES</b></p> <p><u>Green infrastructure</u></p> <p>Paragraph 6.2 defines green infrastructure as “the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places” and “at smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks”.</p> <p>Paragraph 6.2.5 acknowledges the role of green infrastructure in enhancing the design quality of the built environment. It goes on to state that “with careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places”. It is also advised that “there are multiple ways of incorporating green infrastructure, dependent on the needs and opportunities a site presents”.</p> <p>Paragraph 6.4.21 establishes that “planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible”.</p>
<p>Technical Advice Notes (TANs)</p>	<p>Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs:</p> <ul style="list-style-type: none"> <li>• TAN 2: ‘Planning and Affordable Housing’ (June 2006);</li> <li>• TAN 5: ‘Nature Conservation and Planning’ (September 2009);</li> <li>• TAN 10: ‘Tree Preservation Orders’ (October 1997);</li> <li>• TAN 12: ‘Design’ (March 2016);</li> <li>• TAN 15: ‘Development and Flood Risk’ (2004)</li> <li>• TAN 18: Transport (2007).</li> </ul>
<p>Supplementary Planning Guidance (SPG)</p>	<p>The local planning policies are supplemented by Supplementary Planning Guidance (SPG). The following SPGs have been identified as most relevant to the development proposals:</p> <ul style="list-style-type: none"> <li>• Biodiversity SPG (May 2021)</li> <li>• Development Sites (December 2016)</li> <li>• Affordable Housing (September 2015)</li> <li>• Parking Standards (June 2013)</li> <li>• Planning Obligations (September 2016)</li> </ul>
<p><b>Planning History</b></p>	
<p>Planning History</p>	<p>The site has one historic planning application for residential development (2008).</p>

## Pre-Application

### Pre-Application Advice

On the 10th of July 2022, a pre-application enquiry was submitted on behalf of the proposed development, and it was assigned to Case Officer Mark Hyde. Subsequently, a meeting took place on the 6th of December 2022 to discuss the written response received. The feedback received was generally supportive of the proposed scheme, with a few main considerations to be addressed, as outlined below:

- **Pedestrian Connectivity:** It was recommended that the development incorporates a pedestrian link connecting the site to Mwtshwr. This addition aims to enhance pedestrian connectivity and accessibility in the area.
- **Landscaping:** The inclusion of a suitable Landscaping Scheme was advised. This scheme should encompass the planting of trees in the front gardens of the properties, aiming for a ratio of 1-2 trees per every two properties.
- **Welsh Language Impact Statement:** It was requested that a Welsh Language Impact Statement be included as part of the application submission. This statement should assess and address the potential impact of the proposed development on the Welsh language and provide appropriate measures to support its preservation and promotion.
- **Housing Mix:** It was desirable to deliver the housing mix of the scheme in line with the most recent Local Market Housing Assessment for the ward.

Subsequent to receiving these recommendations, the necessary revisions have been made to the scheme where suitable. The development has been evolved to align with the aspirations and requirements of the Local Authority.

### Community Engagement

To ensure the continued evolution of the scheme, as well as to gather insights from the local community regarding the proposed development, a community engagement event took place on the 16th of March 2023 at Lamphey Village Hall.

The following matters were raised and discussed at the event:

- Ecological mitigation
- Overlooking impacts from the Southern boundary
- New pedestrian access to Mwtshwr
- Traffic Generation
- Density of new development
- Problems with the existing drainage system

During this event, various matters were discussed, and the feedback received has influenced the design and layout of the scheme. Particular emphasis was placed on considering the needs of elderly and disabled residents who will rely on pedestrian links to and from the site. A ramped access has been provided within the scheme at the desired location. This focus on accessibility aims to ensure that the development is inclusive and caters to the needs of all residents. As an outcome of the community engagement session, the St. Dogmael's local community footpath group presented a comprehensive plan showcasing the wider footpath network in St. Dogmael's.

This presents a valuable opportunity for collaboration and coordination between the developer and the footpath group. One potential initiative that emerged from this collaboration is the creation of informative leaflets outlining the pedestrian routes. These leaflets can be distributed to prospective residents, encouraging them to engage in active travel and discouraging excessive reliance on private vehicles for shorter journeys.

	<p>In further direct response to the valuable feedback from the local community, there has been amendments to the scheme's layout, ensuring greater consideration for the existing properties along the southern boundary. Furthermore, the development will now prioritise the upgrade of the existing private drainage system through the proposed SAB scheme, addressing numerous issues that have been causing significant disturbances to the residents. These adjustments reflect the commitment to actively engage the local community.</p>
<p><b>Analysis</b></p>	
<p>Land Use Planning</p>	<p>The site falls within the settlement boundary for St Dogmaels and the eastern is allocated for housing under the Adopted LDP.</p> <p>St Dogmaels is identified as Service Village which is one of the rural settlements of the County. As such, this village has a “good provision of services and facilities to meet the day to day needs of their population but plays a more limited role for the wider population” as per supporting text of Policy SP15. Furthermore, the site within a reasonable walking distance from the services and facilities in St Dogmaels, and the village has a close relationship with the town of Cardigan. For these reasons, the site is considered to be sustainably located in line with the local spatial strategy set out by Policies SP12, SP13, SP15 and GN26.</p> <p>The Pembrokeshire Joint Housing Land Availability Study 2018 indicates 2874 units which are either allocated or have planning permission and are considered available within the 5-year plan supply for Pembrokeshire. On this basis, the housing provision is made for approximately 7,480 dwellings in the Plan period, to enable the delivery of 6,800 dwellings (425 per year) for the period 2017-2033 in accordance with the Deposit of Replacement LDP that provides the latest updated data in this regard.</p> <p>In view of these figures, there is a well-established housing trajectory towards delivering further housing to meet the shortage of permanent residential accommodation in Pembrokeshire. In this context, the proposed development positively contributes to meet this housing need. Obsidian Homes are fully aware and committed with this objective and, in line with that, the proposed scheme acknowledges the high sustainability profile of the site.</p> <p>The proposed development will consist of a varied range of housing types, from 2 bedroom houses to 5 bedroom houses. In doing so, the scheme will provide a wide range of options to cater the housing needs of different types of householders.</p> <p>In terms of non-market housing, Policy GN28 stipulates that a contribution to affordable housing will be required on all housing allocations and windfall sites. It is also stated that that development within the Service Village of St Dogmaels requires 5% of proposed housing to be affordable housing. The proposed site layout includes 2 affordable housing units out of 29 which is in excess of the minimum 5% contribution.</p> <p>On balance, the development positively contributes to further housing supply in highly sustainable locations and meet the local housing trajectory. It also commits to the delivery of affordable housing as per LDP requirements. The proposals therefore accord with Policies SP12, SP13, GN26, GN28 and SPG Affordable Housing.</p> <p>The inclusion of the site within the remit of the urban settlement clearly indicates that the site is strategically acceptable for development subject to addressing appropriately other key planning material considerations. Moreover, pre-application engagement, and a subsequent meeting has confirmed the site’s suitability in land-use planning terms.</p>

A wide range of site-specific surveys and assessment have been undertaken for the preparation of this planning application. It is demonstrated that any loss of habitats and biodiversity would be appropriately mitigated and compensated to achieve a net gain.

On balance, it is evident the high sustainable credentials of the site and nature of the development in terms of therefore local spatial strategy and therefore the proposed residential scheme is in line with Policy SP3 and GP2.

### Housing need

Throughout the pre-application process, careful consideration was given to the proposed housing mix. Initially, the Local Authority aspired for the development to align with the house types identified as having the highest demand according to the Pembrokeshire Local Market Housing Assessment (LMHA) 2021. However, after receiving valuable advice from local agents at 'Countrywide,' who provided insight into the realities of the current market conditions, it became evident that a more tailored approach was necessary. To supplement this, a Covering Letter prepared by 'Countrywide' has been appended to this statement.

*Fig.6 Proposed Housing Mix*

Site Coverage								
Unit code	Type	Storey Height	Number	Percentage %	Floor area (sqm)	(sqft)	Total coverage (sqm)	(sqft)
<b>Private</b>								
Type A	5B	3 Storey	2	7	174	1,870	347	3,740
Type A (Custom)	5B	3 Storey	1	4	174	1,870	174	1,870
Type B	5B	3 Storey	3	11	176	1,894	528	5,682
Type C	4B	2 Storey	5	19	142	1,528	710	7,640
Type D - Split Level	3B	2/3 Storey	8	30	121	1,305	970	10,440
Type E - Split Level	3B	2/3 Storey	8	30	118	1,271	945	10,168
<b>Total</b>			<b>27</b>	<b>100</b>			<b>3,673</b>	<b>39,540</b>
<b>Affordable 10%</b>								
Type G	2B	2 Storey	2	100	84	899	167	1,798
<b>Total</b>			<b>2</b>	<b>100</b>			<b>167</b>	<b>1,798</b>
<b>Total</b>			<b>29</b>				<b>3,840</b>	<b>41,338</b>
						Net Developable (ha)	Net Developable (acres)	Site Coverage (sqft per acre)
						0.901	2.228	18,554

The discussions held with the Local Authority during the subsequent phases of pre-application have concluded that the proposed mix of housing types is acceptable to meet the diverse demands and preferences of potential homeowners or tenants.

### Design and Character

A site and context analysis has been carried out by Roberts Limbrick Architects. The area has been identified to be urban residential in nature, with mainly detached housing on surrounding streets. As mentioned above, the site is well located to a range of amenities that are accessible by foot, bicycle or driving. Creating a low-density housing development has been chosen to create a vibrant and active infill urban block with private open space (POS).

The scheme will also encourage healthier lifestyles as it will be well-linked with the existing network of pedestrian infrastructure that leads to the bus and railway services nearby; provides good standards of amenity enjoyment by way of both private and communal gardens; and make appropriate provision of car parking for the new dwellings.

The site and context analysis has identified a range of opportunities and constraints that have an impact to the design of the development.

- The residential properties abutting the site to the west and north need to be carefully considered for the design of house types and plot siting.
- The existing site access on Awel-Y-Mor will be retained for the new development and improved to respond to the anticipated vehicular and pedestrian movements.
- The views from the site to the surroundings are identified generally from south to north
- The existing woodland and mature hedges are identified and will form part of the landscaping strategy for the development.
- A reptile area on the site and the likely presence of other species and habitats.

The development will comprise 29 dwellings within a 0.8 ha site which is in line with the density ratio of at least 25 dwellings per hectare as per Policy GN26. From the point of access on Awel-Y-Mor, the adopted highway will be extended into the site in the form of a spine road. Two private driveways will stem from this road and provide access to most of the plots.

The siting, orientation, and height of the residential buildings have been carefully designed to provide legible development and a sense of continuity with the cul-de-sac layouts in the neighbouring land. Furthermore, the site layout responds to the sun path to maximise opportunities for the daylight enjoyment and energy efficiency performance of the buildings.

The existing green infrastructure will be retained, preserved for its lifetime and enhanced for the purpose of visual quality and ecology network. A comprehensive ecology strategy will be designed to protect legally protected and notable species and habitats in addition to habitats and biodiversity enhancement. New open spaces will be provided for communal use and the green areas will also play a significant role for the SUDS-based drainage scheme for the development.

The mix of housing will be highly varied. There will be a balance of two-storey and three-storey houses. Whilst most of the house types are detached and semi-detached house, there will be one row of three terrace houses. The house footprints and roof layouts will be diverse to the extent that rhythm will be perceived across the street scenes. Likewise, the materiality will provide a moder appearance to the houses without being at odds with the established character in the area.

The gross internal floorspace of each unit will ensure good living conditions to the future occupiers. In particular, the affordable housing units will be fully compliant with Welsh Development Quality Requirements 2021 (WDQR).

In light of the considerations above, the development proposals ensure good design given the site itself and its context and therefore accord with LDP Policies SP1, GN1, GN2 and GN26.

Residential amenity

The residential development has the appropriate density given the net site area. The site layout is deemed to effectively balance the sufficient landscaping areas, highway infrastructure, car parking provision and residential plots.

The plot arrangement is such that neither overlooking effect nor overbearing effect would occur to the future occupiers. By reason of separation distances, no adverse effect is anticipated between the existing properties adjoining the site and the nearest new houses. Through the pre-application process, a proving layout has been issued to confirm this. Furthermore, the layout initially proposed for community engagement has been revised in direct response to concerns raised by neighbouring occupiers to the Southern boundary of the development, who felt that the proposals had an overbearing impact to their homes. The revised scheme responds directly to address this issue.



	<p>The house types for the residential scheme have been designed to provide good standard of amenity for future occupiers of the dwellings. All habitable rooms will have an acceptable standard of light, outlook and privacy and their amenity spaces sufficiently private and usable and appropriate for family-sized dwellings such as those that are propose.</p> <p>In conclusion, the design of the development will ensure good levels of residential amenity in accordance with LDP Policies SP1, GN1, GN2 and GN26.</p>
Ecology	<p>A Preliminary Ecological Appraisal (PEA) of the site was undertaken by Wyndrush Wild Ltd. The aim of the survey is to provide baseline data on habitat and species, both on and adjacent to the site, and to investigate potential impacts that may occur during construction and post-construction stages. An assessment is also made of any potential impact on protected sites or species in the area.</p> <p>The areas of grassland, scrub and woodland have been identified to support breeding birds including species of conservation concern. No rare plant species are present, but the vegetation will support a range of insect species. These in turn could support foraging bats, and further survey work is proposed to assess the significance of the site to local bat populations. Reptiles could also be present and further survey was subsequently carried out to ascertain their presence or absence.</p> <p>As a result of the findings above, a Reptile Survey was undertaken also by Wyndrush Wild Ltd. The conclusion is that a significant population of slow worms is present on the western part of the site, together with a small population of barred grass snake. A precautionary approach has been taken to prevent their harm or even death during the construction works. A suitable site has been identified to carry out a translocation of the slow worms.</p> <p>The proposed landscaping strategy has addressed the existing ecology conditions on the site and its surroundings. New planting is proposed with the aim of maximising biodiversity by the use of native species appropriate to the setting.</p> <p>In summary, the proposals demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity. Where harm has been identified to any specie or other habitat, appropriate mitigation has been designed. The development therefore complies with LDP Policy GN37.</p>
Trees	<p>In respect of the trees, a Tree Survey including a Tree Constraint Plan was undertaken by Treescene. The tree quality of each tree on the site has been assessed and management recommendations have been proposed where applicable.</p> <p>As it stands, the site is covered in dense low level trees and shrubs and is surrounded by a woodland buffer to the east and north incorporating larger, significant trees. These trees will be retained, buffered and protected throughout the building stages.</p>
Drainage	<p>A detailed Drainage Strategy has been produced for the Site and full technical details will be submitted for approval under a SAB application.</p> <p>In regard to storm runoff, the primary objective of any surface water drainage strategy is to mimic the drainage characteristics of the existing site as far as practicable in the future development. The previous development phase storm system served off Awel y Mor was intended to be adopted and maintained by DCWW. As the application was not completed, the system is currently privately maintained which includes a concrete attenuation tank and flow control device located within this application development phase.</p>

	<p>As part of this application, it is the intention to divert the existing drainage system within the proposed development highway layout and propose new storage structures which would become adopted by the Local Authority under the Schedule 3 of the Flood and Water Management Act SAB requirement.</p> <p>Due to limited information received on the previous phase surface water system, the design calculations could not be validated, however the proposed system which will serve the proposed and existing development phases will be designed to store surface water runoff up to 100yr return period including 30% for climate change discharging at 5.5lit/sec which is equivalent to the development site greenfield runoff rate into an adjacent surface water culvert. As green SuDS features such as detention basins are proposed, this will encourage groundwater recharge throughout the development site, reducing the volume of surface water discharging offsite.</p> <p>As part of the previous development, an existing watercourse was culverted through the site. As part of the diversion works required based on this development layout, a section of the watercourse will be opened. This will provide additional capacity withing the existing system. Diversion of the existing watercourse will be subject to a Ordinary Watercourse Consent.</p> <p>In regard to foul water, an existing public sewer currently bisects this application site. Under a S185 agreement, the public sewer will be diverted via the proposed adopted highway, providing a simpler system to maintain by DCWW. The preferred method for managing foul water disposal on this application site will be gravity connections into the diverted sewer which discharges into Mwtshwr Rd.</p> <p>The final DCWW treatment works serving St Dogmaels discharge point is classed as a tidal connection, as such phosphate treatment is not an issue for this application site.</p>
<p>Highways Impact and movement</p>	<p>Planning Policy Wales recognises the differences between development in different areas and the need to consider local context, with paragraph 4.1.17 stating “Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances.”</p> <p>A Transport Statement has been prepared for the scheme by Apex Transport Consulting, including swept path analysis. This report has been prepared to provide the necessary information for the Local Highway and Planning Authorities to consider the merits of the proposals in terms of location, connectivity, highway safety, parking, access and the impact of on the local highway network.</p> <p>The site is accessed from Awel-Y-Mor and currently comprises of undeveloped open space. The proposed development consists of 29 residential dwellings accessed via a continuation of Awel-Y-Mor.</p> <p>Car parking will be provided in accordance with standards with 2-3 spaces per dwelling and appropriate turning areas provided to accommodate refuse vehicle entering and exiting the site in forward gear. The proposed parking provision of 2-3 spaces per dwelling is considered appropriate when considering the car ownership levels in the surrounding area and is in line with parking standards.</p> <p>The site is situated in a location where journeys by sustainable modes are a realistic alternative to the private car. The site offers the potential for access by walking, cycling and public transport. There are facilities, services, schools, and employment areas situated within suitable walking, cycling, and public transport distances via appropriate and safe routes, reducing the need to travel by car. The site is connected to Awel Y Mor to the south which provide suitable routes to the surrounding area.</p>

	<p>As aforementioned within this statement, pedestrian connectivity is at the heart of the scheme, with plans for a collaborative effort with St Dogmaels Footpath Group. A new pedestrian link will also be formed from the site onto Mwtshwr, which through both pre-application engagement with the Local Authority, and community engagement with local residents has been requested as being desirable.</p> <p>The obtained road safety data does not indicate an existing safety issue which would be exacerbated by the proposals and there is no accident issue on the key walking routes. Furthermore, trip generation analysis shows that the proposed residential use is forecast to generate a maximum of one vehicle on the local highway network every four minutes, on average, during peak hours. This would not have a material impact on the operation of the highway.</p> <p>Data does not indicate a road safety issue which would be exacerbated by the proposals. The development would not have an unacceptable impact on road safety and the access arrangements and pedestrian routes will provide safe and suitable access for the proposed residential use.</p> <p>In summary, it has been demonstrated that the development proposals will ensure highway safety to all road users, encourage active travel, and provide appropriate car parking provision in accordance with LDP Policies GN1 and GN2, TAN18, PPW11, and the Active Travel Act.</p>
<p>Conclusion</p>	<p>The site has been identified highly appropriate for such use in light of its partial strategic allocation and central location in St. Dogmaels, as well as its close relationship with Cardigan. The provision of housing accords with the housing trajectory and targets in Pembrokeshire. The provision of affordable housing will be demonstrably justified and in line with the policy provisions in this matter.</p> <p>At the first stages of the design process, there has been engagement with the local community and the Local Authority, and their feedback have been taken into consideration for subsequent revisions of the proposals.</p> <p>The impact of the development of the site upon habitats and biodiversity is an essential material consideration that compromise the viability of the development. A set of comprehensive surveys have been conducted at this stage of the planning process. The relevant species and habitats have been identified as well as any harm upon them by reason of the development. This harm is not significant and proposals for appropriate mitigation and enhancement have been outlined to provide a net benefit for biodiversity.</p> <p>The form and appearance of the development will respond to the character of the area and ensure good standards of residential amenity. Sustainability in transport is feasible given the availability of services and facilities nearby, active travel infrastructure and moderate car parking provision.</p> <p>For these reasons, it has been demonstrated that placemaking has been put into practice through the design of the scheme. The considerations above also reveal to what extent the residential development adheres to the provisions of National policy in the form of PPW and all relevant TANs. Furthermore, the scheme also accords with the key policies of Pembrokeshire LDP and the guidance contained within the adopted SPGs.</p> <p>In conclusion, the proposed development is committed with sustainable development and is fully consistent with the planning policy framework.</p>