

[REDACTED]

From: [REDACTED]
Sent: 16 December 2024 12:27
To: Thomas, Kane
Cc: LDP - For Enquiries
Subject: RE: Deposit LDP 2 Representations - 4 x WWHA Sites

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: D Rep

EXTERNAL EMAIL – Exercise care with links and attachments E-BOST ALLANOL – Byddwch yn ofalus wrth agor dolenni ac atodiadau.

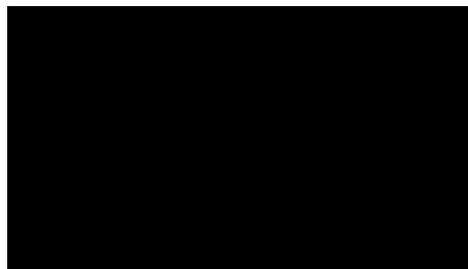
Hi Kane,

Here are new WeTransfer links to the supporting information for the four sites.

1. Land adjacent to Bro'r Dderwen, Clunderwen, Pembrokeshire, SA66 7NE
<https://we.tl/t-LImZVWAhxx>
2. Land at Nant Y Ffynnon, Letterston, Pembrokeshire, SA62 5SX
<https://we.tl/t-tA1lVX7MIA>
3. Land at Golwg Y Llan, Eglwysrwrw, Crymymch, Pembrokeshire, SA41, 3UP
<https://we.tl/t-eBLes7BlqB>
4. Land adjacent to Maes Merydd, Llandissilio, SA66 7TG
<https://we.tl/t-yfQ6EUujMQ>

Thanks,

Mike



[REDACTED]

Subject: Deposit LDP 2 Representations - 4 x WWHA Sites

Morning Kane,

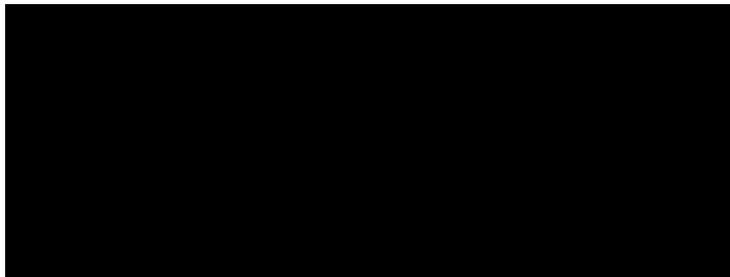
I hope you are well.

Last Friday we submitted representations on behalf of Wales & West HA for the following 4 sites that we have discussed in recent weeks. I'm conscious all the supporting documents were included on individual WeTransfer links but there is only a fairly short window to download the information. Could you let me know if you can access the links ok and have managed to download the documents or whether you need fresh links?

1. Land adjacent to Bro'r Dderwen, Clunderwen, Pembrokeshire, SA66 7NE
2. Land at Nant Y Ffynnon, Letterston, Pembrokeshire, SA62 5SX
3. Land at Golwg Y Llan, Eglwysrwrw, Crymch, Pembrokeshire, SA41, 3UP
4. Land adjacent to Maes Merydd, Llandissilio, SA66 7TG

Thanks,

Mike





Hoffem gael eich barn am y Cynllun Datblygu Lleol ac ar ddogfennau sy'n cefnogi'r Cynllun Datblygu Lleol. Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. sylwadau neu wrthwynebiadau) Mae fersiynau nodiadau cyfarwyddyd ar gael o <https://www.sir-benfro.gov.uk/adolygur-cynllun-datblygu-lleol/adneuo>.

*Sylwch: **Ni fydd** sylwadau a wneud ar Gynllun Adneuo 2020 yn cael eu symud ymlaen ac mae angen gwneud sylwadau newydd ar y Cynllun Adneuo presennol hwn.*

Os ydych yn cyflwyno copi papur, atodwch dudalennauychwanegol lle bod angen. Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Yr Arolygiaeth Gynllunio.

Mae'n rhaid derbyn eich sylwadau erbyn hanner nos Rhagfyr 16eg 2024. Dychwelwch ffurflenni at: ldp@pembrokeshire.gov.uk neu Y Tîm Cynlluniau Datblygu, Neuadd y Sir, Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

We would like your views on the Local Development Plan (LDP) and also on documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at <https://www.pembrokeshire.gov.uk/local-development-plan-review/deposit>

*Please note: Representations made on the 2020 Deposit Plan will **not** be taken forward and it is necessary to make new representations on this current Deposit Plan.*

If you are submitting a paper copy, attach additional sheets as necessary. This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received by midnight 16 December 2024. Please return forms to: ldp@pembrokeshire.gov.uk or The Development Plans Team, County Hall, Freeman's Way, Haverfordwest, Pembrokeshire SA61 1TP

RHAN A: Manylion cysylltu

PART A: Contact details

Eich manylion/manylion eich cleient
Your / your client's details

Manylion yr asiant (os ydynt yn berthnasol)
Agent's details (if relevant)

Enw Name		REDACTED
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		Amity Planning (on behalf of Wales & West Housing Association)
Cyfeiriad Address		Suite 212, Creative Quarter, Cardiff. CF10 1AF
Rhif ffôn Telephone no		REDACTED
E-bost Email address		REDACTED
Llofnodwyd (gallwch teipio) Signed (can be typed)	REDACTED	
Dyddiad	13/12/2024	



Date		
RHAN B: Eich sylw		
PART B: Your representation		
Eich enw / sefydliad Your name / organisation	Wales & West Housing Association	
1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau? 1. Which part(s) of the Plan (or supporting documents) are you commenting on?		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	Policy SP7 (Settlement Boundaries) GN16 (Residential Allocations)	
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	Page 50, Paragraph 4.32 Pages 124-130, Paragraphs 5.102-5.105	
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	Proposal Map (PM5) Eglwyswrrw (Inset Index Map 42)	
Os yw eich sylw yn perthyn i ddogfen ategol (e.e. y Gwerthusiad o Gynaliadwyedd), rhowch yr enw(au) a'r cyfeiriad(au) i mewn yma. If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.	No specific document.	
2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol. <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> 2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. <i>For more information on soundness and procedural requirements, see the guidance notes.</i>		
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.		
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed.	x	
Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. I think that the procedural requirements have not been met.		
3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?		



Ticiwch bob un sy'n berthnasol.

3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

Dyraniad safle newydd

New site allocation

X

Polisi newydd

New policy

Paragraff neu destun ategol newydd

New paragraph or supporting text

4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel y safle cais? Os felly, a fyddoch cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).

4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).

Enw'r safle

Site name

This is proposed as an alternative site allocation.

The site is known as:

'Land at Golwg Y Llan, Eglwyswrrw, Crymych, Pembrokeshire, SA41, 3UP'

Cyfeiriad y cais

Site reference

N/A

Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Rhestrwch eich sylwadau isod.

Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i



gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/profion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

This representation is accompanied by the following drawings and documents:

- Site Representation Statement (240096SRS-01)
- Site Location Plan (R585-SK-03)
- Existing Topographical Survey (R585-S-01)
- Development Site Constraints Plan (R585 SK-02)
- Feasibility Site Layout (R585 SK-01A)
- Agricultural Land Classification Survey (April 2024)
- Landscape Character & Visual Impact Assessment (TDA2993LC&VIARhC08.24)
- Preliminary Ecological Appraisal (April 2024)
- Transport Statement (1737-ACS-ZZ-XX-RP-T-241-B)
- Sustainability Appraisal (December 2024 – Rev 2)

Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.

Tick here if you are submitting additional material to support your representation.

X

6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer hefyd y bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol ar gyfer darparu ar gyfer y rhain sydd eisiau rhoi tystiolaeth lafar.

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written



comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

Rwyf am siarad mewn sesiwn gwrandawriad.

I want to speak at a public hearing.

x

Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

We would be grateful to reserve the right to participate at the relevant hearing session(s).

9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.

9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

Rwy'n dymuno cael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

Rwy'n dymuno cael fy nghlywed yn Saesneg.

I wish to be heard in English.

x



Nodiadau cyfarwyddyd

Guidance notes

Caiff Cynllun Datblygu Lleol Cyngor Sir Penfro ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.

'Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:

1. Ydy'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)
2. Ydy'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)
3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)

Darperir rhagor o wybodaeth am y profion cadernid a gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.

Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.

Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio am fwy nag un newid i'r

The Pembrokeshire County Council Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.



Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.

Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid nodi cynrychiolydd y grŵp (neu'r prif ddeisebydd) yn glir.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.

Site Representation Statement

Land at Golwg Y Llan, Eglwyswrrw, Crymych,
Pembrokeshire, SA41, 3UP

December 2024

Document Reference: 240096SRS-01

amity
planning consultants



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Figure 1: Site location Plan

Figure 2: Extract from Land Registry Map Search

Figure 3: Extract from second Deposit Local Development Plan (2017 – 2033) Proposals Map

Figure 4: Extract from NRW Flood Map for Planning

Figure 5: Extract from Historic Wales Map

Figure 6: Compliance Assessment of Welsh River SACs against Phosphorus Targets (Source: Data Map Wales)

Appendices

Appendix 1: Illustrative Site Layout Plan/Masterplan

1. Introduction	
Client	Wales & West Housing Association (WWHA)
Purpose	<p>This statement has been prepared, on behalf of WWHA, in response to the statutory consultation being carried out by Pembrokeshire County Council (PCC) in respect of the second Deposit Local Development Plan (LDP) 2 2017 – 20233 (hereafter ‘the Plan’).</p> <p>This consultation provides an opportunity to suggest different sites or changes to boundaries to those included in the second Deposit Plan. Accordingly, WWHA hereby submit the land adjacent at Golwg Y Llan in Eglwysrwrw as an ‘alternative site’ to be developed for residential purposes.</p> <p>The site subject to this representation has not previously been submitted to the Council for consideration in conjunction with the Plan preparation process and has not been identified in the Deposit Plan 2 as one for development purposes. It is on this basis we propose this ‘alternative site’ as an objection to the Plan, since it is unsound in its current form on the grounds it will under-deliver housing (i.e. Test 3: Will the plan deliver?).</p>
Statement Structure	<p>This statement seeks to demonstrate the acceptability of the proposed alternative site for residential purposes in the context of relevant planning policy, taking into account the context of the site and the surrounding forms of development. The remainder of the statement is, therefore, structured as follows:</p> <ul style="list-style-type: none"> ▪ Section 2 provides an explanation of the context of the site, including site details and a description of the proposals; ▪ Section 3 sets out the site’s opportunities and constraints; ▪ Section 4 provides commentary on the site’s environmental considerations; ▪ Section 5 analyses the deliverability of those proposed housing allocations within WWHA’s catchment area; ▪ Section 6 considers the primary planning matters applicable to the residential development of the site; ▪ Section 7 provides an overview and concludes the statement.
Supporting Information	<p>In addition to this statement, this representation is supported by the following plans and technical reports:</p> <p><u>Plans</u></p> <ul style="list-style-type: none"> ▪ Site Location Plan (R585-SK-03) ▪ Existing Topographical Survey (R585-S-01) ▪ Development Site Constraints Plan (R585 SK-02) ▪ Feasibility Site Layout (R585 SK-01A) <p><u>Technical Assessments & Documents</u></p> <ul style="list-style-type: none"> ▪ Deposit LDP 2 Representations Form ▪ Agricultural Land Classification Survey (April 2024) ▪ Landscape Character & Visual Impact Assessment (TDA2993LC&VIARhC08.24) ▪ Preliminary Ecological Appraisal (April 2024) ▪ Transport Statement (1737-ACS-ZZ-XX-RP-T-241-B) ▪ Sustainability Appraisal (December 2024 – Rev 2)

2. The Site: Location, Extent & Rationale

Site Address Land at Golwg Y Llan, Eglwysrwr, Crymych, Pembrokeshire, SA41, 3UP.

Site Location The extent and location of the site is shown on the site location plan below.

The area shaded blue comprises an existing housing allocation (LDP Reference SG/033/00035), which is termed ‘phase 1 - Land at Heol Yr Eglwys, Eglwysrwr’ and has extant planning permission (LPA Reference 21/0871/PA), granted on 22 March 2022, for 23 affordable dwellings, subject to a local lettings policy. This development has been constructed and is known as Golwg Y Llan.

The area shaded red denotes the proposed alternative site (the phase 2 land) that is the subject of this representation.

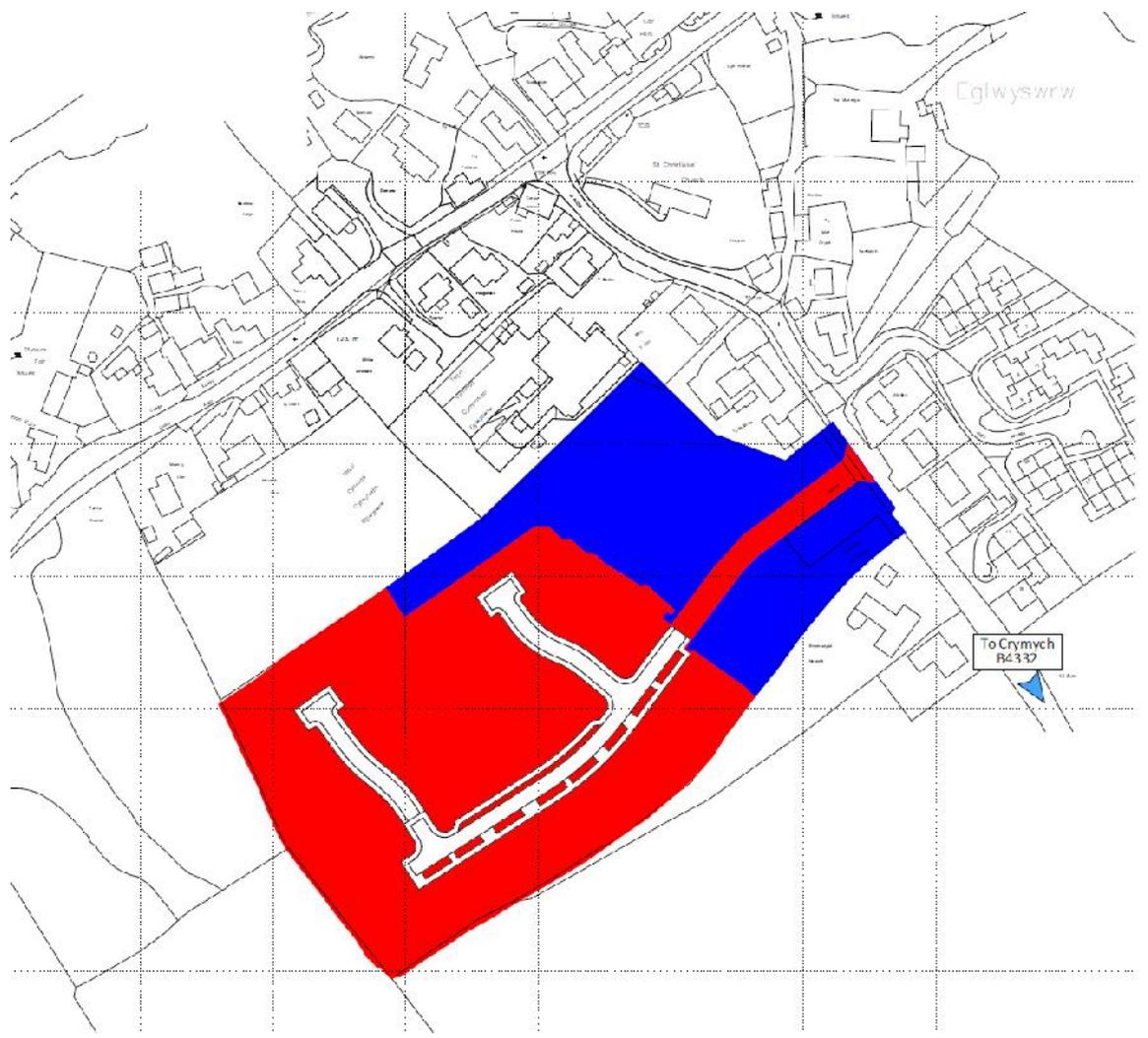


Figure 1: Site Location Plan

Site Description The site extends to 1.9 hectares (4.7 acres) and comprises agricultural land located to the southwest of an existing residential development known at Golwg Y Llan, which is accessed from the B4332 that leads into Eglwysrwr, connecting to the A487.

The entire site constitutes greenfield land that is devoid of buildings and consists of the remains of an undulating grassland field defined by mixed native hedgebanks to the south,

	<p>west and north. The eastern boundary is formed by those rear gardens of the adjacent residential development.</p> <p>The site shares its northern and eastern boundaries with the settlement limits, as defined by the Proposals Map accompanying the second Deposit LDP 2.</p> <p>The site will be accessed by extending the existing Golwg Y Llan estate road. This is a recently constructed road designed to current recommended standards. It provides a 5.5m wide carriageway and 2m wide footways on both sides.</p> <p>The immediate character of the area to the north and east is residential. To the south and west are agricultural fields divided by established hedge banks.</p>
<p>Existing Use</p>	<p>Agricultural land.</p>
<p>Proposed Use</p>	<p>It is proposed to develop the site for residential purposes (Use Class C3).</p> <p>It is anticipated this will comprise a mix of open market and general needs affordable homes.</p> <p>An illustrative site layout plan has been prepared in support of this representation to provide an indication of how the site could be developed with residential dwellings. The illustrative layout/masterplan demonstrates how 42 dwellings (22 dwellings per hectare) could be provided on the site, together with open space provision, Sustainable urban Drainage Systems (SuDS) and an ecology buffer with the adjacent agricultural land. The layout is included at Appendix 1 of this statement.</p> <p>Since the Site Promoter is WWHA, it would not be appropriate for land to be identified in the Plan as a self-build/custom build site for housing.</p> <p>WWHA recently obtained planning permission for a 92-unit scheme on an allocated housing site in Narbeth known as ‘land west of Bloomfield Gardens and north of Adams Drive and Highfield Park’. It is proposed to bring forward this alternative site in the same manner as the Bloomfield site; offering a mixed tenure scheme, inclusive of WWHA’s bespoke Low Cost Home Ownership (LCHO) dwellings.</p> <p>WWHA may be open to discussion about the site being identified for 100% affordable housing. This will likely be determined based on the housing need in the area at the time of delivery.</p>
<p>Land Ownership</p>	<p>The entirety of the site forms part of a wider land holding covered under one title deed (WA981789) that includes the land on which the Golwg Y Llan development has been constructed. The entirety of the site falls within the ownership of WWHA.</p> <p>The site can be accessed by extending the existing turning head that terminates Golwg Y Llan, which is adopted highway. There is no ransom strip that may otherwise affect the deliverability and viability of the site’s future development.</p>

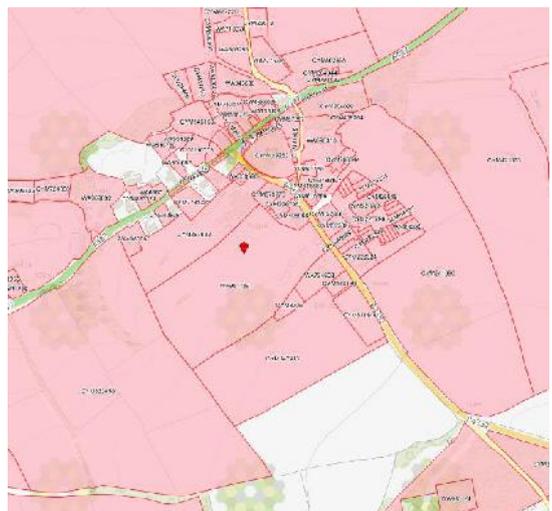


Figure 2: Extract from Land Registry Map Search

Planning History	<p>Based on the Council’s online planning history records, there have been no previous planning applications at the site.</p> <p>The adjacent site (known as the Phase 1 land) was granted planning permission (LPA Reference 21/0871/PA) on 22 March 2022 for the development of an existing housing allocation (LDP Reference HSG/033/00035), for 23 affordable dwellings.</p>
Rationale for Housing Allocation	<p>The Deposit Plan 2 sets out a housing requirement of 5,840 dwellings over the Plan period (i.e. 2017 - 2033). This equates to 365 dwellings per annum.</p> <p>Whilst the emerging Plan makes provision for 6,425 dwellings, which includes a 10% flexibility allowance, based on the analysis of housing delivery reported in the Annual Monitoring Reports (AMRs) over the first six years of the emerging Plan period (i.e. 2017 to April 2023), there has been an under-delivery of 336 dwellings per annum. Accordingly, the housing requirement has been adjusted to 382 dwellings for the remaining 10 years of the Plan period (i.e. April 2023 to 2033).</p> <p>The Deposit Plan 2 suggests new homes will be developed mainly on land allocated specifically for housing and in sustainable locations within defined settlement boundaries. However, many of the proposed allocated sites are based on historic allocations that have been rolled-on from the adopted LDP and later historic Plans. It is evident that key housing sites are not being delivered as anticipated, which suggests the need for additional site allocations.</p> <p>The proposed alternative site, subject to this representation, is located adjacent to the settlement boundary and is served by existing infrastructure. The site presents a sustainable, realistic and deliverable opportunity to provide much-needed new homes in Pembrokeshire. The proposals have the ability to comply will all aspects of planning policy and will not result in any detrimental environmental impacts that cannot be mitigated for. It is on this basis this representation has been prepared, which demonstrates there is clear justification for securing the allocation of this land in the LDP 2 for housing purposes.</p>

3. Opportunities & Constraints

Planning Constraints	<p>The site falls outside of the settlement boundary for Eglwysrwr and is not allocated for any specific land use purpose, as defined by the proposals map which accompanies the second Deposit LDP 2 (2017 – 2033).</p>
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- Settlement Boundary / Ffin Aneddiad (SP 7)
- Main Town / Pŵl Drol (SP 8)
- Service Centre / Canolfan Gwasanaethau (SP 9)
- Service Village / Pentref Gwasanaethau (SP 10)
- Cluster Local Village / Pentref Gwasanaethau (SP 11)
- Local Village / Pentrefi Lleol (SP 12)
- Community Facility / Cyllestr Cymuned (GN 30)
- Employment / Cyflogoth (GN 9)
- Mixed Use / Defnydd Cymysg (GN 10)
- Strategic Employment / Cyflogoth Strategol (SP 14)
- Specialist & Supported Accommodation / Llety Arbharigol a Chefnogol (GN 23)
- Solar Array / Arwyddwr (GN 5)
- Green Space / Tiriogaeth Ffrwythlon (GN 24)
- Strategic Employment / Cyflogoth Strategol a Odlleir (SP 15)
- Residential Allocation / Dynodiad Preswyl (GN 16)
- Residential Strategic Allocation / Dynodiad Strategol Preswyl (GN 16, 19, 19B)
- Residential Commitment / Ymrwymiad Preswyl (GN 17)
- Armenly Open Space / Man Agored Mwyndd (GN 12)
- Recreational Open Space / Man Agored Hamddenol (GN 51)
- Green Wedge / Molem Las (GN 48)
- Mineral Allocation / Dynodiad Mwynnau (GN 37)
- Existing Quarry Site / Safle Chwera Presennol (GN 31)
- Existing Wharf / Glanfârn Hen (GN 38)
- Sand and Gravel Areas Of Search / Ardaloedd Chwilio Tywod a Graen (GN 37)
- Mineral and Quarry Sites Buffer / Clustoga Safondd: Mwynnau a Chwera (GN 40)
- Town Centre Boundary / Ffin Canol Tŷ (GN 32)
- Primary Retail Frontage / Blaen Adwerthu Cymuned (GN 31)
- Secondary Retail Frontage / Blaen Adwerthu Eiddod (GN 31)
- Port and Energy Related Development / Port a Datblygu Cysthedeig (SP 13)
- Brandy outside wire / Brandy tu allan i'r wifren (GN 7)
- Brandy within wire / Brandy o fewn i'r wifren (GN 7)
- Hard Rock Resources / Ad-dod Craig Goleu (GN 38)
- Sand and Gravel Resources / Ad-dod Tywod a Graen (GN 39)
- Transport Safeguarding / Diogelu Cludiant (GN 36)
- Adjoining Local Planning Authority Area / Ardal Awdurdod Cymlynio Lleo Cytffind

Figure 3: Extract from second Deposit Local Development Plan 2 (2017 - 2033) Proposals Map

The site is not covered by any statutory or non-statutory ecological or landscape designations. However, it is greenfield and three of the peripheries are marked by hedgerows interspersed with trees.

Under the current Technical Advice Note 15 (Development & Flood Risk) (July 2004), the site falls within Zone A (i.e. considered to be at little or no risk of fluvial or coastal/tidal flooding), as defined on the Development Advice Map (DAM). Under the revised TAN 15 (currently suspended due to further consultation) Flood Map for Planning, the site falls outside of an area at risk of flooding from rivers or seas or surface water and small watercourses.



Figure 4: Extract from NRW Flood Map for Planning

In terms of heritage features, there are no listed buildings or Scheduled Ancient Monuments (SAMs) on the site. Whilst the site is not within a conservation area, it is adjacent to the Eglwysrwr conservation area boundary. There are some listed buildings in the village and there is a SAM to the northwest of the site (on the opposite side of the A487). This SAM (Cadw Ref: PM171 – Castell Eglwysrwr) comprises the remains of a motte and bailey castle. This is divided from the site by established vegetation and intervening buildings.

- NMRW (RCAHMW)
- HER (Welsh Archaeological Trusts)
- Listed Buildings (Cadw)
- Scheduled Monuments (Cadw)
- Designated Wrecks (Cadw)
- Great Britain Boundary
- Historic Mapping (Ordnance Survey 6"/mile ca.1888)

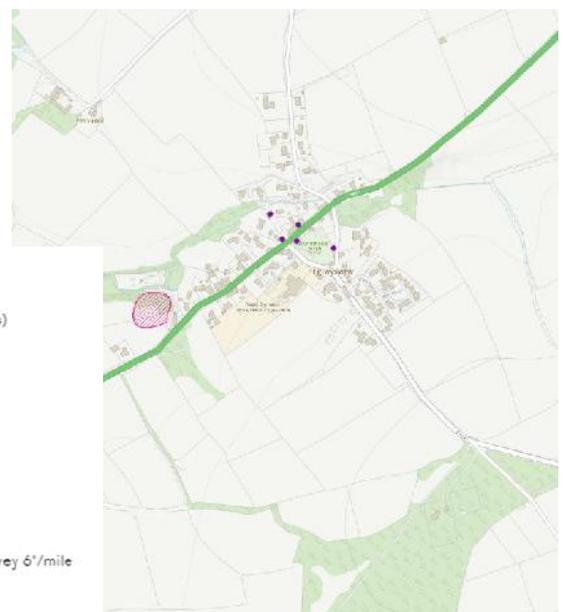


Figure 5: Extract from Historic Wales Map

The site does not fall within an archaeologically sensitive area.

Utilities

The proposed housing can be feasibility connected to the existing infrastructure in the area:

- Electricity Supply
- Landline Telephone
- Broadband

	<ul style="list-style-type: none"> ▪ Foul Sewerage ▪ Water Supply
Water Connection	The proposed housing can be connected to the existing water main located in the B4332 carriageway.
Drainage	<p>Foul water discharges will be conveyed to the existing public sewer located in the B4332 carriageway, into which the Phase 1 development connects.</p> <p>It is intended to deal with surface water via a sequential approach in accordance with Part H of the Building Regulations. The last resort would be to discharge surface water to the mains sewerage system, which would need to be sanctioned by Dwr Cymru / Welsh Water. The site offers sufficient potential for the inclusion of Sustainable urban Drainage Systems (SuDS), subject to feasibility.</p>

4. Environmental Considerations

Is the site located within or adjacent to a mineral buffer zone?	No.
Is the site located within a Mineral Safeguarding Area?	No.
Is the site within or immediately adjacent to an AQMA?	The site is not located with a designated Air Quality Management Areas (AQMA), the only such areas within the County being in Haverfordwest and Westgate Hill by Pembroke Castle.
Does the site contain high carbon soil e.g., peatlands?	No.
Does the site contain high quality agricultural land (grade 1, 2, 3a)?	<p>Planning Policy Wales (Edition 12) requires that the Best and Most Versatile (BMV) agricultural land (i.e. Grades 1, 2 and 3A of the Defra Agricultural Land Classification System) should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable.</p> <p>The Welsh Government’s Predictive Agricultural Land Classification (ALC) Map (Version 2 - published in 2020) categorises the site as subgrade 3a agricultural land. The guidance note that accompanies the ALC Map (May 2021) sets out that where land is shown on the predictive map as potentially of Grades 1, 2 and 3a an ALC Survey is required.</p> <p>Accordingly, an ALC Survey has been undertaken and supports this representation. The survey concludes 1.8 hectares of the site is subgrade 3a land, whilst the remaining 0.1 hectares in non-agricultural land.</p> <p>The site forms part of a larger field, with the land to the east having obtained planning permission for non-agricultural development. The remaining field is a relatively small area,</p>

	<p>suitable only to grassland uses due to the size and slope of the parcel. Based on the land quality within the area, the historic use of the site, minimal economic farming benefits of its use and the small area of BMV land involved, only limited weight should be given to the loss of the small area. Further detail and justification is provided in the accompanying ALC Survey.</p>
<p>Is the site located within or immediately adjacent to any RIGs?</p>	<p>Regionally Important Geological and Geomorphological Sites (RIGS) are locally designated sites of local, regional, and national, importance for geodiversity.</p> <p>These sites may provide cultural, educational, historical and aesthetic resources, and are protected from development as a material consideration through the planning system by the Town and Country Planning Act 1990.</p> <p>The site is not within nor immediately adjacent to any RIGS.</p>

<p>Is the site within or adjacent to a phosphate sensitive SAC catchment?</p>	<p>The site and its wider area are not within any phosphate sensitive SAC catchment as shown in Figure 6 below.</p>
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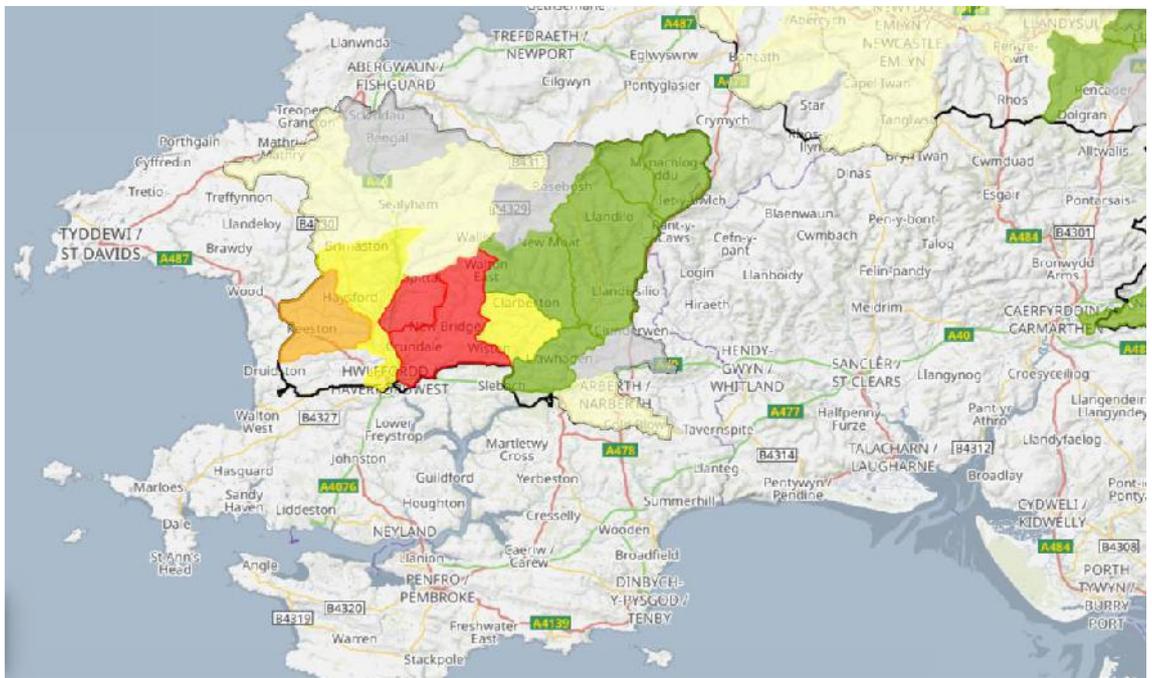
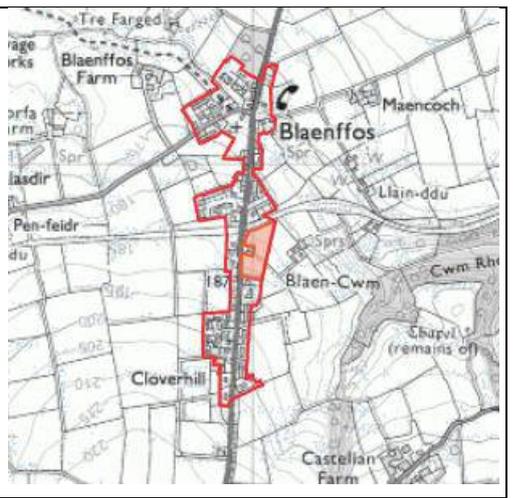
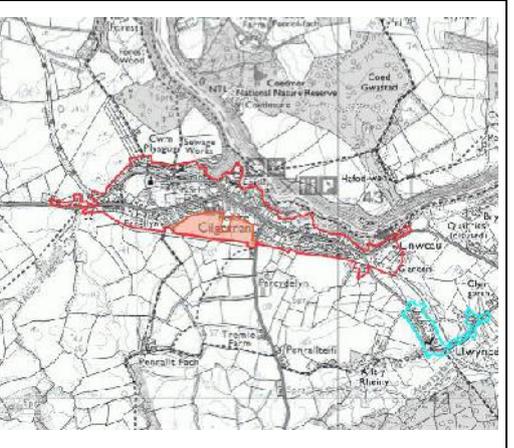


Figure 6: Compliance Assessment of Welsh River SACs against Phosphorus Targets (Source: Data Map Wales)

5. Analysis Of Second Deposit Plan LDP 2 Housing Allocations

<p>HSG/030/LDP/01 (Crymych)</p>	<p>‘Land east of Waunaeron’</p> <p>This proposed housing allocation has been transferred from a historic allocation in the adopted LDP (Ref: HSG/030/LDP/01) which has failed to be delivered. Deliverability is, therefore, questionable.</p>	
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<p>HSG/0006/0003 (Blaenffos)</p>	<p>‘Land adjacent to Hafod’</p> <p>This proposed housing allocation has been transferred from a historic allocation in the adopted LDP (Ref: HSG/006/00003) which has failed to be delivered. Deliverability is, therefore, questionable.</p>	
<p>HSG/020/LDP2/1 (Cilgerran)</p>	<p>‘Land at Tan Ffynnon Fields’</p> <p>We understand this site may be subject to deliverability issues.</p>	

6. Alternative Site Assessment

<p>Principle of Development</p>	<p>The alternative site falls outside the settlement boundary for Eglwysrwr, but is directly adjacent to it on two sides and the curtilages of existing dwellings.</p> <p>The emerging LDP 2 identifies Eglwysrwr as a ‘service village’ (2b), designated in settlement hierarchy under Policy SP6. The matrix accompanying Policy SP6 identifies ‘service villages’ as being acceptable locations for housing allocations, windfall market housing, local need affordable housing and exception sites for affordable housing. Furthermore, emerging Policy SP9 (service centres and service villages) defines ‘service villages’ in the County as offering good provision of services and facilities to meet the day-to-day needs of their population. The policy goes on to state that housing allocations for market and affordable housing will be identified in Service Villages, with the precise number for each village varying according to their location, service provision and capacity to accommodate development. The settlement hierarchy and associated definitions contained within emerging policy have been transferred from the adopted policy and clearly accept the principle of housing allocations in and adjacent to this service village.</p> <p>Moreover, the site is not within open countryside and is adjacent to an established settlement; being on the urban fringe, opposite existing dwellings, served by existing infrastructure associated with the surrounding housing development and can be integrated easily into the neighbouring built-up area. The site, therefore, presents a sustainable, realistic and deliverable opportunity to provide much-needed new homes for a specific housing need; representing a logical extension of an established and well served key settlement. It is on this basis the site is being promoted for the inclusion as a housing allocation in the LDP 2.</p>
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	<p>The key material planning considerations associated with the development of the site for housing purposes are discussed below.</p>
<p>Visual & Landscape Impact</p>	<p>The site is not located within or adjacent to any local or national landscape designations. Nevertheless, given the site is greenfield and the proposals represent an extension to the settlement boundary, a Landscape Character and Visual Impact Assessment (LCVIA) has been prepared by Tirlun Design Associates (TDA) and supports this representation.</p> <p>From a visual and sensory perspective, LANDMAP has located the site within the ‘Mynydd Crogwy’ aspect area. This aspect area is classified as being of moderate overall value, comprising a large aspect area which forms the contextual setting for the Preseli Hills. It is characterised by an upland area of rolling farmland with occasional wooded valleys and areas of grazing, having a moorland "feel" on more exposed hill tops. Whilst the topography varies the landscape has a similar characteristic throughout. Open borrowed views of the Preseli Hills to the west and further borrowed views northwards to the coast add to the sense of place within the aspect area.</p> <p>Pembrokeshire County Council has undertaken an extensive landscape character assessment of the County. The results of this study are summarised by the ‘Pembrokeshire County Landscape Character Assessment’, produced by White Consultants, 2019 (updated 2022). This landscape assessment describes the overall character of ‘Boncath’ as an area of rolling pastoral farmland to the north of the Preselis with a few areas of grazed moorland and a conifer plantation on the exposed hilltop of Frenni Fawr. The area is incised with small steep sided wooded valleys with watercourses feeding into the Afon Taf and Afon Cych. Settlements are generally linear in character with some having industrial origins.</p> <p>The LCVIA has been produced in accordance with the ‘Guidelines for Landscape and Visual Impact Assessment (3rd Edition)’ produced by The Landscape Institute and Institute of Environmental Management & Assessment (2013). The significance of the development’s impact upon existing views from areas accessible to the public has been assessed using significance criteria for visual impact contained within the 2013 Guidelines. A visual appraisal has been undertaken based on a series of photo viewpoints. This concludes the site’s visual envelope is generally restricted and that the site is predominantly screened by intervening topography, existing built form and field boundary hedgerows.</p> <p>The visual appraisal has established the site is not visible from any of the 8 viewpoints. They are well screened by the natural topography of the area, existing built form and field boundary / roadside hedgerows. Whilst any proposed development would change the character of the site itself, it would have no discernible impact upon the wider landscape character of the area. The proposed development does not have a significant detrimental impact on local amenity in terms of visual impact, does not adversely affect landscape character, quality or diversity, respects and protects the natural environment and maintains and, where possible, would enhance biodiversity.</p> <p>Overall, the LCVIA concludes the site can accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape in which it is located.</p>
<p>Welsh Language</p>	<p>TAN 20 (Planning and the Welsh Language) seeks to safeguard and promote the interests of the Welsh language through development proposals.</p> <p>In accordance with this policy context, the impact of the proposed residential use of the site on linguistic character of the surrounding area is a material consideration.</p>

	<p>The development proposal will provide new homes (including the policy compliance level of affordable housing (as a minimum)) in an area where there is an identified need for housing to meet local needs. The provision of new homes will, therefore, enable Welsh speakers to remain in the area. Given the affordable tenants will come from the general locality, it is envisaged they will already use the existing services and facilities in the area (including the local schools). As a matter of course, any signage to be provided within the development will be bilingual. Accordingly, the residential use of the site will not have a detrimental impact upon the needs and intensity of the Welsh language and will, in fact, ensure Welsh speakers can remain in the area.</p>
<p>Highways Safety and Movement</p>	<p>The subject site is located within walking distance of all Eglwysrwrw’s services and facilities. A short distance to the southwest is Ysgol Cymunedol Eglwysrwrw (primary school) and the village’s church. A wider range of services and facilities can be accessed in Cardigan (10km to the northeast) and Fishguard (20km to the southwest). The nearest bus stops are located on the A487, some 300m walk.</p> <p>A Transport Statement has been prepared in support of this representation to consider the means of access to the site, the impact of the proposals on the highway network and the need for active travel measures.</p> <p>It is proposed to access the site by extending the existing Golwg y Llan estate road. This is a recently constructed road designed to current recommended standards. It provides a 5.5m wide carriageway and 2m wide footways on both sides. Golwg y Llan is accessed from the B4332, which connects with the A487 trunk road approximately 150m to the north.</p> <p>The potential trip generation of the proposed development has been estimated by reference to the TRICS trip rate database. The TRICS data suggests the proposed development will generate around 20 to 24 peak hour vehicle movements. The TS states this volume of traffic will not have a significant impact on the operation of the surrounding highway network.</p> <p>Overall, the TS concludes the site is an appropriate location for housing that is safely accessible by all forms of transport. Moreover, the impacts of the development on the continued operation and safety of the surrounding highway network would be acceptable or can be suitably mitigated.</p>
<p>Ecology</p>	<p>The site is not subject to any statutory or local ecological designation. Nevertheless, a Preliminary Ecological Appraisal (PEA) has been undertaken, by I&G Ecological Consulting, and supports this representation. This report includes a description of the site’s ecological conditions, the ecological context and an appraisal of the site’s ecological value. The content of the report is based on the findings of an Extended Phase 1 Habitat Survey and site inspection.</p> <p>The PEA concludes the site predominantly consists of semi-improved grassland with a hedgerow boundary and several trees. The site has a moderate local ecological value, with the hedgerow and trees forming part of an intricate series of wildlife corridors within the wider area. These areas would largely be retained as part of the any development of the site. The land adjacent to the proposed point of access is open and not restricted by hedging or trees. The concept layout also includes the provision of wildlife buffers with surrounding land/development to retain vegetation and promote connectivity. The dominant habitat on the remainder of the site comprises semi-improved grassland of low local ecological value.</p> <p>The PEA set out the following conclusions and recommendations:</p> <ul style="list-style-type: none"> ▪ Preparation of a Construction Ecological Management Plan (CEMP) to consider sensitive areas of the site and detail strategies and measures to mitigate and minimise the potential negative impacts on the environment.

	<ul style="list-style-type: none"> ▪ Mitigation for loss of habitat may, in part, take the form of improved management for biodiversity on the remaining areas of land within ownership ▪ Retention and protection of the on-site trees and associated features to be managed as a landscape feature. ▪ A number of trees on site were assessed to have moderate bat roosting potential and with the hedgerow providing flightlines for migrating species, as such a bat survey would be needed if any trees are to be removed. ▪ Preparation of a lighting scheme of the site during construction, and after, to avoid disturbance of bats, and will be designed to maintain dark corridors for bats and other nocturnal animals. ▪ Vegetation clearance should be planned outside the nesting bird season. ▪ A potential badger sett entrance was observed at the base of a tree to the southwest of site. As such, it is recommended a Phase II badger survey take place to determine if the sett is active. <p>The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty) requiring Local Authorities to maintain and enhance biodiversity in the exercise of their functions. The residential development of the site can suitably incorporate measures to ensure net enhancement of biodiversity. This could take the form of new native planting and provision of artificial habitats such as bat bricks/boxes.</p>								
<p>Viability and Deliverability</p>	<p>It is our view that the subject site represents a viable and deliverable opportunity for housing purposes that is accessible to key transport routes, adjoins a well-served existing service centre and represents a logical rounding off of this existing and established settlement.</p> <p>WWHA undertake comprehensive due diligence when site finding. As part of this exercise, viability is tested, factoring in all known costs, revenue, the potential for abnormal costs resulting from site constraints and analysis of market conditions. This exercise has been undertaken in respect of this alternative site, which is determined to represent a viable development proposition. In addition, there is potential for this scheme to obtain Social Housing Grant (SHG), which would support site viability.</p> <p>The site is not encumbered by any known legal constraints / covenants and our client is the landowner. As such, its development could be delivered within the emerging Plan period and would make a significant contribution to the housing land supply for the County.</p> <p>It is anticipated that a planning application could be submitted within 6 months of securing sufficient confidence through the LDP process an allocation is forthcoming. Based upon the current LDP timescales, and assuming the LPA would not accept an early application, it is anticipated that a planning application would be submitted in 2026. If the opportunity exists to bring forward an application on the site in advance of this, then the Site Promoter would be happy to consider this.</p> <p>We have sets out below an indicative delivery schedule for the dwellings proposed on the site.</p> <table border="1" data-bbox="325 1675 1473 1794"> <thead> <tr> <th>2026/2027</th> <th>2027/2028</th> <th>2028/2029</th> <th>2029/2030</th> </tr> </thead> <tbody> <tr> <td>20</td> <td>-</td> <td>22</td> <td>-</td> </tr> </tbody> </table>	2026/2027	2027/2028	2028/2029	2029/2030	20	-	22	-
2026/2027	2027/2028	2028/2029	2029/2030						
20	-	22	-						
<p>7. Conclusion</p>									
	<p>The evidence prepared and submitted as part of this representation demonstrates there has been an under-delivery of housing within the County over the adopted Plan period, which has continued into the emerging Plan period. It is evident that key housing sites are not being</p>								

delivered as anticipated, which suggests the need for additional site allocations. We, therefore, object to the Deposit Plan 2 and propose the land adjacent land at Golwg Y Llan in Eglwysrwrw as an 'alternative site', since it has the potential to deliver a viable housing scheme adjacent to an established settlement.

The development of the site forms a logical extension, and rounding off, of the settlement and is suitable for housing development; making best and most effective use of this vacant and underutilised site, in a sustainable location, that is suited only to grassland uses due to the size and slope of the parcel, and will deliver economic, social, and a range of community benefits. This is in addition to the provision of affordable housing. Furthermore, the site is capable of being delivered within the Plan period.

These considerations provide clear and material justification for the site's allocation in the LDP 2 for housing development, which will contribute to the performance of the emerging Plan by providing a genuinely sustainable residential development opportunity.

Appendix 1

Illustrative Site Layout Plan/Masterplan

Proposed Housing Development, Heol Yr Eglwys, Eglwysrwr, Crymych, Pembrokeshire, SA41 3UP



●	2 Person 1 Bedroom Walk-Up Flats	53.0sq.m.	AFH	x4
●	2 Person 1 Bedroom Bungalows	53.0sq.m.	AFH	x2
●	4 Person 2 Bedroom Houses	83.0sq.m.	AFH	x2
●	5 Person 3 Bedroom Houses	94.0sq.m.	AFH	x4
Total No of Affordable Housing =				x12
●	2 Bedroom House	65.0sq.m.	LCHO	x7
●	3 Bedroom House	80.0sq.m.	OM	x14
●	3 Bedroom House	94.0sq.m.	OM	x4
●	4 Bedroom House	127.0sq.m.	OM	x5
Total No of Open Market/LCHO =				x30
Total No of Units =				x42
■	PROPOSED RAINGARDEN / SWALE (SOFT SUDS FEATURE..TBA)			
■	PROPOSED RETAINING WALL (TBA)			
■	POS 'PUBLIC OPEN SPACE' (TBA)			

Legend:
 - Indicates Application Site Boundary
 - Indicates other land in applicants ownership

Proposed Roof/Block Plan

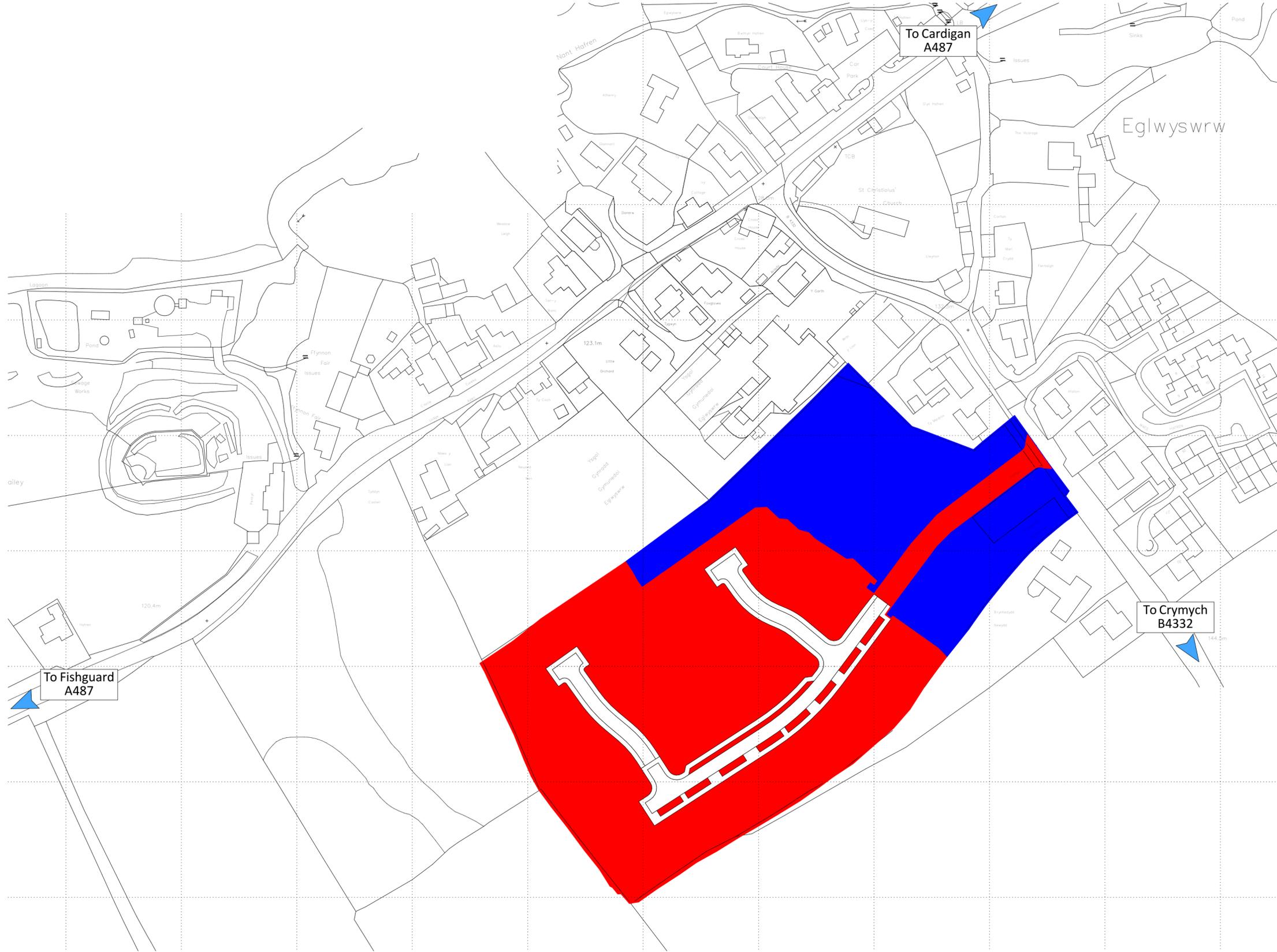
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Revision:	Date:	By:	Notes:
Rev A - Red & blue boundary line added to layout.	27th April 2023	SE/RH	



Client: Tal Wales & West Housing Association	Scale: Noted Date: Nov '23 Drawn: SE/RH	Drawing Title: FEASIBILITY DRAWINGS - Sketch Scheme/Concept Site Plan (Phase 2)
Job Title: Proposed Housing Development, Heol Yr Eglwys, Eglwysrwr, Crymych, Pembrokeshire, SA41 3UP	R585-SK-01A	

Proposed Housing Development, Heol Yr Eglwys, Eglwyswrw, Crymych, Pembrokeshire, SA41 3UP



Site Location Plan

1:1250

Revision:	Date:	By:	Notes:



Client:
Tai Wales & West
Housing Association

Scale: Noted
Date: Nov 23'
Drawn: SE/RH

Drawing Title:
FEASIBILITY DRAWINGS -
Site Location Plan

Job Title:
Proposed Housing Development, Heol Yr Eglwys,
Eglwyswrw, Crymych, Pembrokeshire, SA41 3UP

R585-SK-03

Proposed Housing Development, Heol Yr Eglwys, Eglwysrwr, Crymych, Pembrokeshire, SA41 3UP



●	2 Person 1 Bedroom Walk-Up Flats	53.0sq.m.	AFH	x4
●	2 Person 1 Bedroom Bungalows	53.0sq.m.	AFH	x2
●	4 Person 2 Bedroom Houses	83.0sq.m.	AFH	x2
●	5 Person 3 Bedroom Houses	94.0sq.m.	AFH	x4
Total No of Affordable Housing =				x12
●	2 Bedroom House	65.0sq.m.	LCHO	x7
●	3 Bedroom House	80.0sq.m.	OM	x14
●	3 Bedroom House	94.0sq.m.	OM	x4
●	4 Bedroom House	127.0sq.m.	OM	x5
Total No of Open Market/LCHO =				x30
Total No of Units =				x42

Legend:

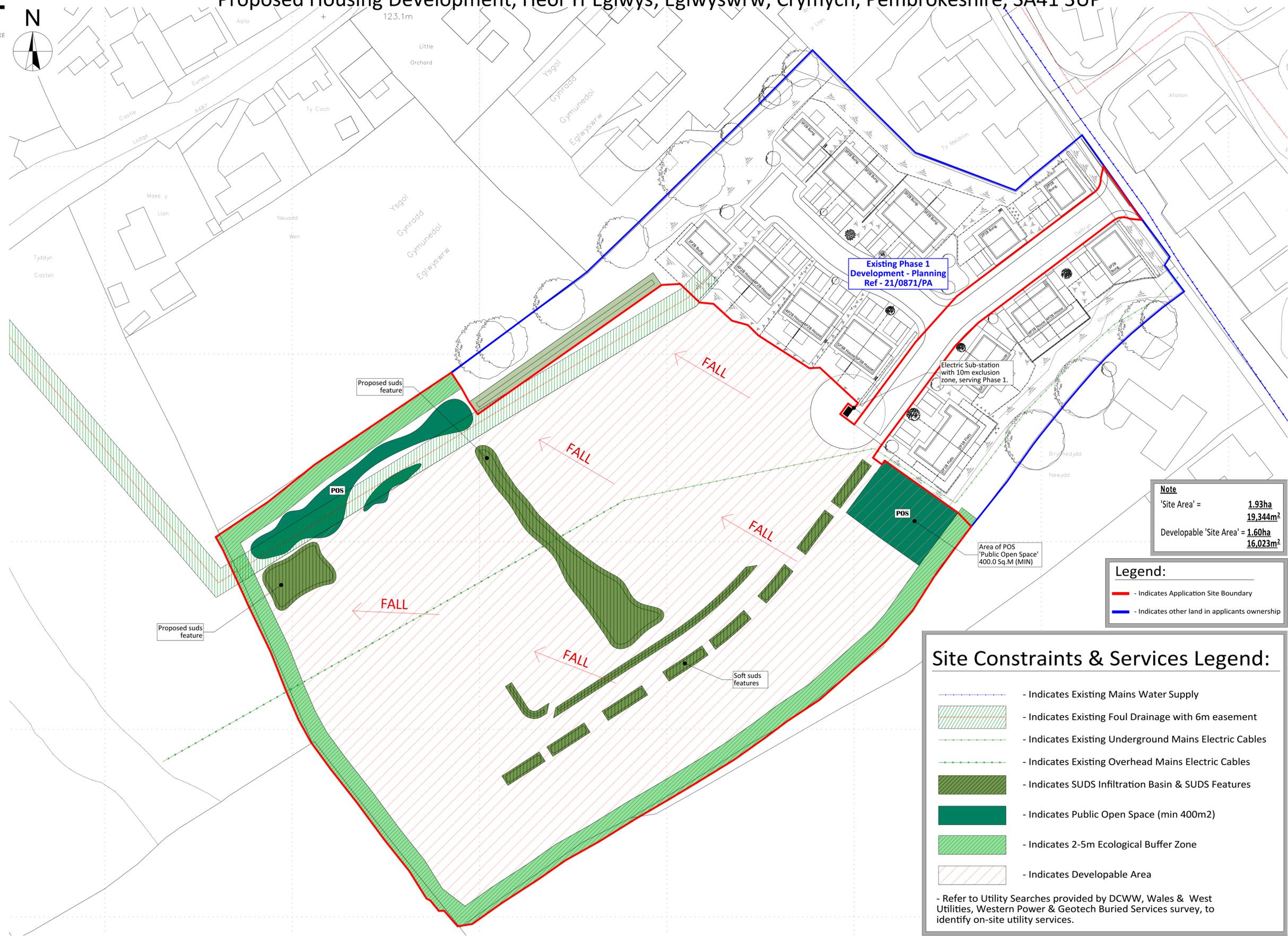
- Indicates Application Site Boundary
- Indicates other land in applicants ownership

Proposed Roof/Block Plan

1:500

Revision:	Date:	By:	Notes:
Rev A - Red & blue boundary line added to layout.	27th April 2023	SE/RH	

Client: Tal Wales & West Housing Association
 Scale: Noted
 Date: Nov '23
 Drawn: SE/RH
 Job Title: Proposed Housing Development, Heol Yr Eglwys, Eglwysrwr, Crymych, Pembrokeshire, SA41 3UP
 Drawing Title: FEASIBILITY DRAWINGS - Sketch Scheme/Concept Site Plan (Phase 2)
R585-SK-01A



Existing Phase 1 Development - Planning Ref - 21/0871/PA

Electric Sub-station with 10m exclusion zone, serving Phase 1.

Note
'Site Area' = 1.93ha
19,344m²
Developable 'Site Area' = 1.60ha
16,023m²

Legend:
- Indicates Application Site Boundary
- Indicates other land in applicants ownership

Site Constraints & Services Legend:

- Indicates Existing Mains Water Supply
- Indicates Existing Foul Drainage with 6m easement
- Indicates Existing Underground Mains Electric Cables
- Indicates Existing Overhead Mains Electric Cables
- Indicates SUDS Infiltration Basin & SUDS Features
- Indicates Public Open Space (min 400m²)
- Indicates 2-5m Ecological Buffer Zone
- Indicates Developable Area

- Refer to Utility Searches provided by DCWW, Wales & West Utilities, Western Power & Geotech Buried Services survey, to identify on-site utility services.

Site Constraints Plan

1:500

Revision:	Date:	By:	Notes:



Client: Tai Wales & West Housing Association
Scale: Noted
Date: Nov '23
Drawn: SE/RH
Job Title: Proposed Housing Development, Heol Yr Eglwys, Eglwysrwr, Crymych, Pembrokeshire, SA41 3UP
Drawing Title: FEASIBILITY DRAWINGS - Development Site Services & Site Constraints Plan
R585-SK-02



Legend:

- - Indicates Application Site Boundary
- - Indicates other land in applicants ownership

Existing Topographical Site Plan

1:500



Site Location Plan

1:2000

Revision:	Date:	By:	Notes:



Client:
Tal Wales & West
Housing Association

Scale: Noted
Date: Nov '23
Drawn: SE/RH

Drawing Title:
SURVEY DRAWINGS -
Existing Topographic Site Plan

Job Title:
Proposed Housing Development, Heol Yr Eglwys,
Eglwysrwr, Crymych, Pembrokeshire, SA41 3UP

R585 S-01



Landscape Character and Visual Impact Assessment of Land off Heol Eglwys, Eglwysrwr

Text, Plans, Photographs & Appendices

Prepared for Wales & West Housing Association

August 2024

TDA/2993/LC&VIA/RhC/08.24



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Plans

TDA/2993/01	Location of Photo Viewpoints
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Appendices

Appendix 1	LCA 15 'Boncath'
Appendix 2	Significance Criteria for Visual Impact. Extract of 'Guidelines for Landscape and Visual Impact Assessment produced by The Landscape Institute and Institute of Environmental Management & Assessment.

Section 1

INTRODUCTION

- 1.1 Tirlun Design Associates (TDA) have been instructed to undertake a landscape character and visual impact assessment of a proposed development site on land off Heol Eglwys, Eglwysrwrw ('The Site'), and assess the general visual and landscape character impacts a proposed new residential development would have upon its surrounding landscape.
- 1.2 Desktop research and site surveys were carried out in April 2024 and their findings are contained herein.
- 1.3 The primary question asked within this document is:

Can the proposed site at Eglwysrwrw accommodate a residential development without adverse impacts upon the character and visual amenity of the site's surroundings.

- 1.4 The document has been set out as follows:
 - **Section 2 - Qualifications & Experience** introduces the member of staff dealing with this assessment on behalf of TDA and highlights their qualifications and experience relevant to this study.
 - **Section 3 - Eglwysrwrw: Planning Context & Landscape Character** introduces the site, its planning context and landscape character.
 - **Section 4 - Landscape Mitigation & Enhancement** outlines the structural landscape strategy for the residential development
 - **Section 5 - Visual Appraisal & Landscape Assessment** is a visual appraisal and landscape assessment of the site.
 - **Section 6 - Summary & Conclusion** provides a summary of the study and presents a conclusion to the question raised within paragraph 1.3.

Section 2

QUALIFICATIONS & EXPERIENCE

- 2.1 This assessment has been carried out on behalf of TDA by Rhodri Crandon and Andrew Perrigo.
- 2.2 Rhodri's qualifications include an honours degree in Landscape Architecture gained from Cheltenham & Gloucester College of Higher Education (CGHE) and a Post Graduate Diploma in Landscape Architecture also from CGHE.
- 2.3 Mr. Crandon is the director of TDA, a landscape consultancy practice based in South Wales, and has 21 years professional practice experience within the field of landscape architecture. Over this period, he has undertaken many projects relevant to this development which have dealt with issues relating to landscape design, landscape planning and landscape & visual assessment.
- 2.4 Mr. Crandon has worked as an expert witness in relation to landscape character and visual issues on many relevant projects both in the private and public sector, including Monmouthshire County Council during their Unitary Development Plan Inquiry in 2004.
- 2.5 Andrew's qualifications include an honours degree in Psychology gained from Cardiff Metropolitan University, a City & Guilds Level 2 in Computer Aided Design and a Post Graduate Diploma in Landscape Architecture from the University of Gloucestershire.
- 2.6 Mr. Perrigo is the Senior Landscape Architect at TDA, and has 18 years professional practice experience within the field of landscape architecture. Over this period, he has undertaken many projects relevant to this development which have dealt with issues relating to landscape design, landscape planning and landscape & visual assessment.

Section 3

EGLWYSWRW: SITE, LANDSCAPE, PLANNING CONTEXT AND LANDSCAPE CHARACTER

Site Context

- 3.1 The proposed development site is located on the western side of the B4332, on the southern edge of Eglwyswrw.
- 3.2 The northern, western and southern boundaries are defined by field boundary hedgerows. The eastern boundary is defined by a partially constructed development of residential properties.
- 3.3 TDA drawing no. TDA/2993/01 – Location of Photo Viewpoints (refer to Plans section of this document) clearly illustrates the site and its context.

Landscape & Planning Context

- 3.4 The site is made up of one parcel of greenfield land, located outside of (but immediately adjacent to) the settlement boundary.
- 3.5 The site is not located within a conservation area and is not covered by any local or national landscape designations. The site is adjacent to the Eglwyswrw Conservation Area boundary.
- 3.6 The site is surrounded by a number of public footpaths, byways & other routes public access. Refer to TDA drawing no. TDA/2993/01 – Location of Photo Viewpoints.
- 3.7 Based upon the study of up-to-date mapping provided by Sustrans there are no local or national cycle routes adjacent to, nor within close proximity of the site.
- 3.8 The site does not contain any tree preservation orders, listed buildings or scheduled ancient monuments.

Adopted Local Plan Policies

Policy GN.1 – General Development Policy (Pembrokeshire County Council Local Development Plan 2013)

- 3.9 Policy GN1 (General Development Policy) states that:

“Development will be permitted where the following criteria are met:

1. The nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and the area within which it is located;

2. It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels;

3. It would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park⁶³ and neighbouring authorities;

4. *It respects and protects the natural environment including protected habitats and species;*
5. *It would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network;*
6. *Necessary and appropriate service infrastructure, access and parking can be provided;*
7. *It would not cause or result in unacceptable harm to health and safety"*

Policy GN.37 – Protection & Enhancement of Biodiversity (Pembrokeshire County Council Local Development Plan 2013)

3.10 Policy GN.37 (Protection & Enhancement of Biodiversity) states that:

"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".

3.11 Consequently, from a landscape perspective, providing the development:

- Does not have a significant detrimental impact on local amenity in terms of visual impact
- Does not adversely affect landscape character, quality or diversity
- respects and protects the natural environment
- Maintains and, where possible, enhances biodiversity

Then it is consistent with the planning policies listed above.

Landscape Character

LANDMAP – The Countryside Council for Wales

- 3.12 The Countryside Council for Wales, now Natural Resources Wales, has undertaken an extensive landscape character assessment of Wales using the LANDMAP information system.
- 3.13 LANDMAP is a GIS (Geographical Information System) based landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated into a nationally consistent data set.
- 3.14 Specialists collect LANDMAP Information in a structured and rigorous way that is defined by five methodological chapters, the Geological Landscape, Landscape Habitats, Visual & Sensory, Historic Landscape and Cultural Landscape. Each of these elements and how they assess the site and its surroundings (including principal management recommendations and long-term guidelines) are further explored below:

Geological Landscape

- 3.15 LANDMAP has located the site within the 'Mynydd Crogwy - Tegrn' aspect area.
- 3.16 It states that the aspect area, which is classified as being of moderate overall value, comprises an extensive area of undulating terrain with a stream-dissected platform-like character. Rounded, domed hills are typical and valleys are only incised along the northern and eastern margins of the area.
- 3.17 The principal management recommendations and long-term guidelines for the aspect area are to ensure that no features or natural systems of geological or geomorphological significance in the area are lost or damaged.

Landscape Habitats

- 3.18 LANDMAP has located the site within the 'N.E. of Mynydd Preseli' aspect area.
- 3.19 It states that the aspect area, which is classified as being of moderate overall value, comprises an undulating agricultural landscape close to the Preseli Mountains. The area predominately comprises of improved grassland with arable land also being frequent.
- 3.20 The principal management recommendations or guidelines are to encourage landowners to participate in agri-environmental schemes and leave overgrown area around the margins of arable fields for the benefit of wildlife.

Visual & Sensory

- 3.21 LANDMAP has located the site within the 'Mynydd Crogwy' aspect area.
- 3.22 It states that the aspect area, which is classified as being of moderate overall value, comprises a large aspect area which forms the contextual setting for the Preseli Hills. It is characterised by an upland area of rolling farmland with occasional wooded valleys and areas of grazing, having a moorland "feel" on more exposed hill tops. Whilst the topography varies the landscape has a similar characteristic throughout. Open borrowed views of the Preseli Hills to the west and further borrowed views northwards to the coast add to the sense of place within the Aspect Area.

3.23 The principal management recommendation and guidelines are to Retain the upland grazing character of the area.

Historic Landscape

3.24 LANDMAP has located the site within the 'Eglwyswrw' aspect area.

3.25 It states that the aspect area, which is classified as being of outstanding overall value, comprises a multi-period landscape containing important evidence dating from the prehistoric era onwards, including the Neolithic/early Bronze Age hengiform site of Castell Mawr, a series of probable medieval defensive sites, including Castell Llainfawr, Castell Dyffryn Mawr and Castell Eglwyswrw, and evidence of an early medieval ecclesiastical presence.

3.26 The assessment does not contain any principal management recommendations or guidelines.

Cultural Landscape

3.27 LANDMAP data for the cultural landscape at Eglwyswrw is unavailable.

Pembrokeshire County Landscape Character Assessment (2019- updated 2022)

3.28 Based on the LANDMAP information system methodology above, Pembrokeshire County Council has undertaken an extensive landscape character assessment of the county. The results of this study are summarised by the 'Pembrokeshire County Landscape Character Assessment', produced by White Consultants, 2019 (updated 2013).

3.29 Using this methodology Pembrokeshire is divided into 29 landscape character areas. The site falls within Landscape Character Area 15 'Boncath' (Refer to Appendix 1).

3.30 The landscape assessment describes the overall character of the 'Boncath' as:

"An area of rolling pastoral farmland to the north of the Preselis with a few areas of grazed moorland and a conifer plantation on the exposed hilltop of Frenni Fawr. The area is incised with small steep sided wooded valleys with watercourses feeding into the Afon Taf and Afon Cych. Settlements are generally linear in character with some having industrial origins such as Crymych, with others having a more rural historic character such as Eglwyswrw. There is a strong historic character in parts with some prehistoric and medieval interest as well as some registered parks and gardens".

3.31 The key landscape guidelines the LCA are listed as follows:

- **Conserve and enhance the heathland and moorland character of Frenni Fawr and Frenni Fach whilst managing access.**
- **Conserve and enhance traditional field boundaries including hedgebanks and hedgerows retaining strong tree cover where appropriate.**
- **Ensure longer term woodland management is appropriate, including replacement of conifers with broadleaves especially at edges and along riparian corridors.**
- **Retain settlement pattern and appearance of traditional buildings and conserve historic landscape elements particularly in farm complexes, avoiding the development of new scattered rural dwellings.**
- **Locate and manage camping and caravan sites in line with County guidance.**

- **Locate and plan wind and solar energy developments in the least sensitive landscapes at an appropriate scale especially avoiding the setting of the National Park and avoiding prominent skylines and slopes.**
- **Reinforce Welsh culture with retention of Welsh place names.**

3.32 Following our own, more detailed, site-specific visual appraisal and landscape assessment carried out in April 2024 (refer to Section 4), we can confirm that the summaries made by LANDMAP and the council's landscape character assessment are a broadly accurate description of the landscape which defines and surrounds the site.

3.33 The site sits within a small rural settlement, within an undulating network of agricultural fields defined by traditional field boundary hedgerows.

Section 4

LANDSCAPE MITIGATION & ENHANCEMENT

4.1 Landscape mitigation and enhancement proposals will be developed to sensitively integrate the development into the landscape (refer to TDA.2993.02 for details). Proposals will include:

- The retention of all existing field boundary hedgerows and associated hedgerow trees wherever possible.
- The infilling of any gaps / thin spots within existing hedgerows to conserve and enhance existing landscape features
- Allowing selected superior hedgerow plants to grow on as hedgerow trees.
- New native tree planting to improve the site's arboricultural character.
- New multifunctional public open spaces for residential amenity and ecological enhancement.

The primary function of the landscape proposals will be to enhance biodiversity and to maintain and enhance links to the wider green infrastructure network.

Section 5

VISUAL APPRAISAL & LANDSCAPE ASSESSMENT

Assessment Methodology

- 5.1 The following section has been produced in accordance with the 'Guidelines for Landscape and Visual Impact Assessment (3rd Edition)' produced by The Landscape Institute and Institute of Environmental Management & Assessment (2013).

Desktop Assessment

- 5.2 In addition to the research undertaken to establish the site's landscape/planning context and landscape character described in Section 3, a desktop assessment of the site was undertaken to identify local visual receptors.
- 5.3 Drawing no. TDA/2993/01 – Location of Photo Viewpoints, located in the Plans section of this document, clearly identifies local visual receptors (including areas accessible to the general public.)

Visual Appraisal

- 5.4 As a consequence of the assessment described above, photo viewpoints were carefully selected to represent the development's possible impacts upon visual receptors located within surrounding area.
- 5.5 For document clarity and ease of interpretation views are categorised according to their distance from the site as follows:
- Short-range – 0-0.5 kilometres from the nearest site periphery.
Mid-range – 0.5-1.0 kilometres from the nearest site periphery.
Long-range – 1.0+ kilometres from the nearest site periphery.
- 5.6 The significance of the development's impact upon existing views from areas accessible to the general public has been assessed using the significance criteria for visual impact included in Appendix 2. The visual impact of the proposed development upon each photo viewpoint is described in *italics* below.
- 5.7 As can be seen from the photographs below, the site's visual envelope is generally restricted. the site is predominantly screened by intervening topography, existing built form and field boundary hedgerows.

Photo Viewpoints

- 5.8 Photo viewpoints 1-8 below can be found in the Photographs section of this document. Their locations and view angles are illustrated by TDA drawing no. TDA/2993/01 – Location of Photo Viewpoints, located in the Plans section of this document.
- 5.9 **Photo Viewpoint 1** is short-range view looking north west from an entrance to a public footpath off the B4332. The site is screened by intervening topography and roadside hedgerows.
Development's visual impact: no change
- 5.10 **Photo Viewpoint 2** is a short-range view looking south west from the B4332 directly opposite the site entrance. The site is screened by partially the intervening constructed residential development.
Development's visual impact: no change
- 5.11 **Photo Viewpoint 3** is a short-range view looking south west from a public footpath between Eglwysrwrw and Treclyn Isaf. The site is screened by intervening topography.
Development's visual impact: no change
- 5.12 **Photo Viewpoint 4** is a short-range view looking east from the A487. The site is screened by intervening topography and roadside trees and vegetation.
Development's visual impact: no change
- 5.13 **Photo Viewpoint 5** is a mid-range view looking north east from a public footpath linking the A487 and the B4332. The site is screened by intervening topography and field boundary hedgerows.
Development's visual impact: no change
- 5.14 **Photo Viewpoint 6** is a short-range view looking north from a public footpath linking the A487 and the B4332. The site is screened by intervening field boundary hedgerows.
Development's visual impact: no change.
- 5.15 **Photo Viewpoint 7** is a mid-range view looking south east from a public footpath adjacent to Pen y Coed. The site is screened by intervening topography and field boundary hedgerows.
Development's visual impact: no change
- 5.16 **Photo Viewpoint 8** is a long-range view looking south from the start of a public footpath adjacent to the entrance to Frochest. The site is screened by intervening topography and field boundary hedgerows.
Development's visual impact: no change

Landscape Assessment

- 5.17 The visual appraisal has established that the site is not visible from any of the 8 viewpoints. They are well screened by the natural topography of the area, existing built form and field boundary / roadside hedgerows.

Landscape Character Assessment

- 5.18 It is clear from the above assessment that the proposed development site is well screened from the surrounding landscape. Whilst any proposed development would change the character of the site itself, it would have no discernible impact upon the wider landscape character of the area.
- 5.19 Furthermore, a proposed residential development would be in keeping with the residential character established by the adjacent, partially constructed residential development immediately to the east.
- 5.20 Consequently, based on the established landscape character of the site's immediate setting, the screening provided by a combination of the natural topography of the area, existing built form and hedgerows, it is considered that the site could accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape.

Section 6

SUMMARY & CONCLUSIONS

Summary

6.1 In assessing whether the site at Eglwysrw can accommodate a new residential development without impacting upon the surrounding landscape this study has:

- Undertaken a desktop assessment of the site's landscape/planning context and landscape character during April 2024;
- Undertaken an on-site visual appraisal and landscape assessment during April 2024.

6.2 Section 1 of this document identified a key question in relation to the site, this being:

Can the proposed site at Eglwysrw accommodate a residential development without adverse impacts upon the character and visual amenity of the site's surroundings.

6.3 This section of the document will summarise the assessments findings in helping to answer the question.

6.4 Firstly Section 3 established that, providing the proposed development does not have a significant detrimental impact on local amenity in terms of visual impact, does not adversely affect landscape character, quality or diversity, respects and protects the natural environment and maintains and, where possible, enhances biodiversity. Then it is consistent with planning policies GN.1 and GN.37 of the Pembrokeshire County Council Local Development Plan.

6.5 Secondly, Section 4 – Landscape Mitigation & Enhancement described how biodiversity and screening of the site will be enhanced through a carefully designed landscape strategy.

6.6 Thirdly, Section 5 - Visual Appraisal & Landscape Assessment established that the site is screened by a combination of the natural topography of the area, existing built form and field boundary hedgerows.

Conclusion

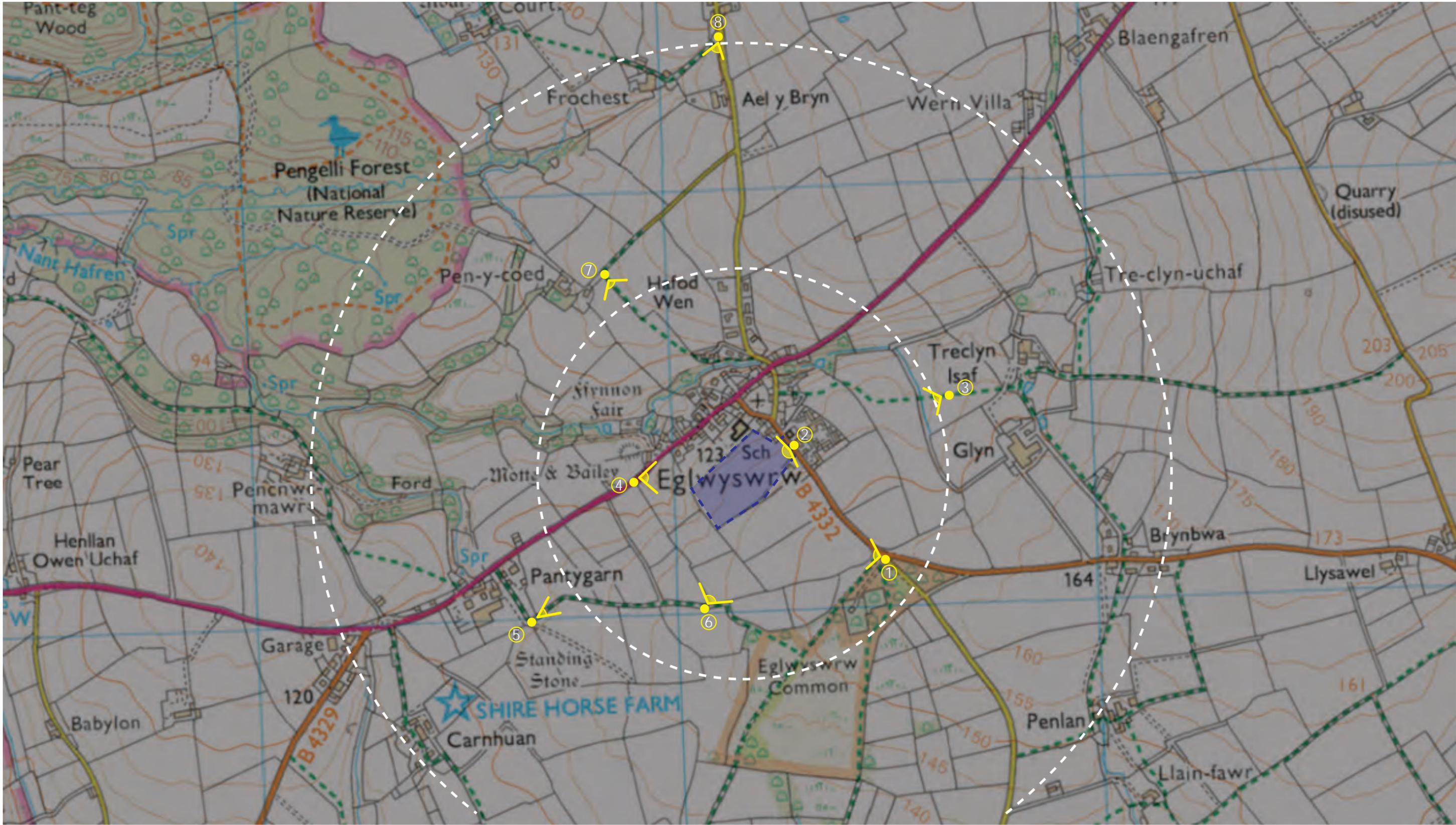
6.7 Due to a lack of visibility within the wider landscape, provided landscape mitigation and enhancement measures are implemented in accordance with drawing no. TDA.2993.02, it is considered that the proposed residential development will:

- Not have a significant detrimental impact on local amenity in terms of visual impact
- Will not adversely affect landscape character, quality or diversity
- Will respect and protect the natural environment
- Will maintain and, where possible, enhances biodiversity

Overall, it is therefore considered that the site can accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape in which it is located.

PLANS

TDA/2953/01 Location of Photo Viewpoints
TDA/2953/02 Structural Landscape Strategy



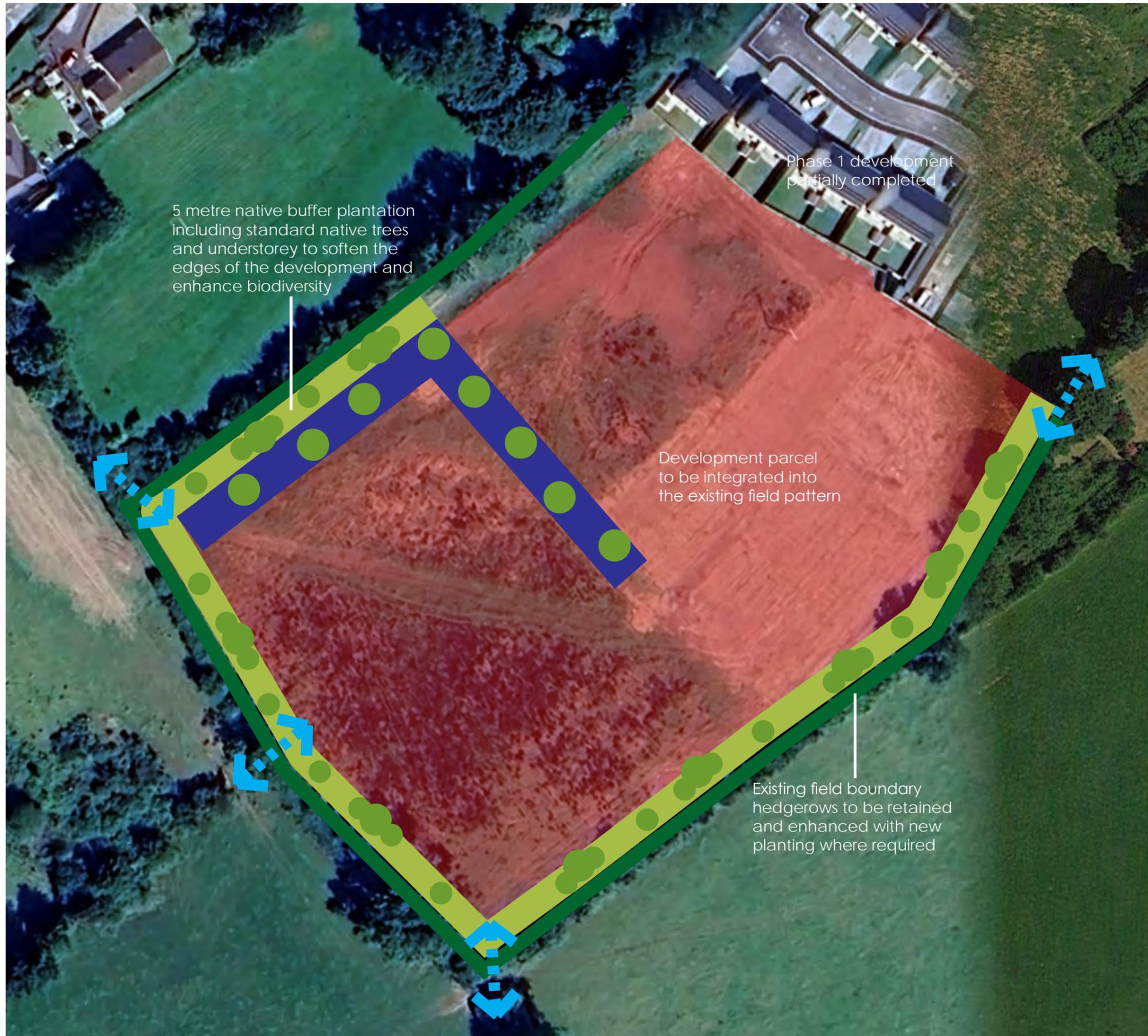
Key

-  Location of Site
-  Photo Viewpoints & Approximate View Angles

Note:
Public rights of way, other routes of public access and roads / paths represented by standard Ordnance Survey symbols

Client	Wales & West Housing Association
Project	Heol Yr Eglwys, Eglwyswrw
Drawing Title	Location of Photo Viewpoints
Drawing No.	TDA/2993/01
Scale	Not to Scale
Date	August 2024
Checked	<u>RHC</u>





- PROPOSED DEVELOPMENT SITE
- NATIVE BUFFER PLANTATION
- EXISTING HEDGEROWS TO BE RETAINED & ENHANCED
- MULTIFUNCTIONAL OPEN SPACE
- KEY GREEN INFRASTRUCTURE LINKS
- PROPOSED TREES / HEDGEROW TREES

NOTE:

Existing hedgerows to be cut once annually, outside of the bird nesting season, to maintain a minimum height of 2.0 metres.

Existing hedgerows to be inter-planted with Hawthorn, Hazel, Holly, Field Maple and Elder



The Granary
 Newland Fawr Farm,
 Llangan, CF35 5DN Tel: 01446 789367
 admin@tirlun-design.co.uk

**Structural Landscape Strategy
 (TDA.2993.02) Proposed Residential
 Development, Eglwysrwr**

PHOTOGRAPHS

- | | |
|-------------------|--|
| Photo Viewpoint 1 | Short-range view looking north west from an entrance to a public footpath off the B4332 |
| Photo Viewpoint 2 | Short-range view looking south west from the B4332 directly opposite the site entrance |
| Photo Viewpoint 3 | Short-range view looking south west from a public footpath between Eglwysrwrw and Treclyn Isaf |
| Photo Viewpoint 4 | Short-range view looking east from the A487 |
| Photo Viewpoint 5 | Mid-range view looking north east from a public footpath linking the A487 and the B4332 |
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| Photo Viewpoint 7 | Mid-range view looking south east from a public footpath adjacent to Pen y Coed |
| Photo Viewpoint 8 | Long-range view looking south from the start of a public footpath adjacent to the entrance to Frochest |

Approximate location of site (screened)

B4332



Photo Viewpoint 1: Short-range view looking north west from an entrance to a public footpath off the B4332

B4332

The site (screened)

Phase 1 development under construction



Photo Viewpoint 2: Short-range view looking south west from the B4332 directly opposite the site entrance

Approximate location of site (screened)



Photo Viewpoint 3: Short-range view looking south west from a public footpath between Eglwysrwr and Treclyn Isaf

A487

The site (screened)



Photo Viewpoint 4: Short-range view looking east from the A487

Approximate location of site (screened)



Photo Viewpoint 5: Mid-range view looking north east from a public footpath linking the A487 and the B4332

Approximate location of site (screened)



Photo Viewpoint 6: Short-range view looking north from a public footpath linking the A487 and the B4332