

1. Design and Visual Impact

Sustainable Design acknowledges that development will be permitted where "It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context" and "is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout."

National Planning Policy Context section, states that creating and sustaining communities is of a high priority. "Creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others."

The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations.

The Proposal should promote inclusive design for the built development and access within and around the development.

The current proposal does not reflect housing in the immediate area and is at odds with the nature of this area of the settlement.

The proposals impose urban design on a rural landscape.

The development will be visible across a large area of the village, given the sites elevation and scale of the 3 storey properties and as such is not appropriate.

The Community Council requests that the developer demonstrates and justifies how it has arrived at this particular design and layout of housing, having regard to development plan policies.

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That the design and scale of the proposals be assessed against its relationship to its surroundings

2. Density and Tenure

Private Dwellings

- 8no. three-bedroom dwellings
- 8no. four-bedroom dwellings
- 5no. four-bedroom dwellings
- 6no. five-bedroom dwellings

Affordable Dwellings

- 2no. two-bedroom dwellings

Any additional development allowed should reflect the 'LDP housing requirement (s5.36) derived from Welsh Government's 2008-based household projections in which 'A major driver of the housing requirement is the reduction in the average size of households, and particularly the increase in single-person households. This changing nature of household provision is one aspect of the increasing need for homes'.

Council's Local Housing Market Assessment (LHMA) 2021 suggests that market housing demand in St. Dogmaels is primarily for one, two and three bed units rather than four and 5 bed units.

It is expected that development proposals for housing will take into account local demand with an identified increasing numbers of single person households and the ageing population. (See

Appendix A, Housing St Dogmaels)

The Community Council requests that the developer demonstrates and justifies how it has arrived at this particular mix of housing, having regard to development plan policies.

How would the proposal support the development of more equal and more cohesive communities with particular reference to 4- and 5-bedroom homes?

If the larger properties do not meet local housing need what is the expected market.

3. Affordable Housing

The probable price point of the proposed four- and 5-bedroom dwellings is not accessible to local people. (See **Appendix B**, Snapshot of local labour market).

The affordable housing schemes currently offered (namely Help to Buy) would not cover properties costing above £250k and, at this price, would still require a £1250 deposit and approx. £187500 mortgage and the proposed dwellings, being attractive to higher wage earners.

While affordable housing units are incorporated into the proposed design and this complies with current planning policies the interpretation of affordable in terms of local need can be viewed on many levels.

‘Redefining housing affordability. The Commission has adopted a basic tenet: “your housing costs should not exceed 33% of your net income”. In addition, incomes are “equivalised” to take account of family size and formation.’¹

Planning Policy Wales 2 establishes a set of ‘key planning principles’ to ensure that the planning system facilitates the right development in the right place. This includes creating sustainable and cohesive communities, for which housing development is a key element.

In light of this the Community Council believes that any additional development allowed should reflect the ‘LDP housing requirement (s5.36) derived from Welsh Government’s 2008-based household projections in which ‘A major driver of the housing requirement is the reduction in the average size of households, and particularly the increase in single-person households. This changing nature of household provision is one aspect of the increasing need for homes’.

What are the short and long-term consequences of the proposal on St Dogmaels, including its composition, cohesion, character, how it functions and its sense of place?

How would the proposal support the development of more equal and more cohesive communities?

How has the housing need been identified for the nature of the proposed development eg large detached houses?

What consideration has been given to the housing needs of older people, including supported living and care?

What consideration has been given to the provision of a mix of market and affordable house types, tenures and sizes?

4. Heritage

The Welsh Language and Placemaking

Placemaking considers the context, function and relationships between a development site and its wider surroundings.

The Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its use and the Thriving Welsh Language well-being goal.

¹ <https://www.affordablehousingcommission.org/news/2020/3/23/making-housing-affordable-again-rebalancing-the-nations-housing-system-the-final-report-of-the-affordable-housing-commission>

Planning authorities must consider the likely effects of their development plans on the use of the Welsh language as part of the Sustainability Appraisal. Planning authorities should seek to ensure a broad distribution and phasing of development that takes into account the ability of the area or community to accommodate development without adversely impacting use of the Welsh language.

Sustainable Developments

The Design and Access Statement provided by Geraint John gives some of the context for planning applications.

Additional context for **Sustainable Development** is provided here as that contained in the above document is selective and does not address a number of material issues:

1. The over-arching obligations in Future Wales

The Well-being of Future Generations (Wales) Act 2015 influences the way we plan for new development; it demands that development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales. Under the commitment to delivering sustainable development we will maximise our contribution to each of the well-being goals.

Planning Policy Wales 2

This establishes a set of 'key planning principles' to ensure that the planning system facilitates the right development in the right place. This includes creating sustainable and cohesive communities, for which housing development is a key element.

Planning Policy (edition 11) - In assessing the Sustainable Benefits of Development account must be taken of Social Considerations:

What are the short and long-term consequences of the proposal on a community, including its composition, cohesion, character, how it functions and its sense of place; and how does the proposal support development of more equal and more cohesive communities?

How would the proposed major development contribute to the achievement of the seven well-being goals as required by the Well-being of Future Generations Act?

How has this proposal taken into account the ability of the area or community to accommodate development without adversely impacting use of the Welsh language?

How does this proposed development enable the Welsh language to thrive in a language sensitive area?

How does this proposed development benefit the local people of St Dogmaels and enrich their community?

5. Site Specific

5.1 Land instability (Policy GN.1, para 6.98)

Geology

The information provided makes no reference to land instability which is a known issue in the local area.

While the sloping nature of the site is noted no detailed geologic report has been made available.

A full geological report should be made available and mitigations identified to resolve any inherent instability.

5.2 Site materials and sensitive environments

Should retaining walls and backfill be required it poses the additional question of sources for the materials and access to site. Highways which offer access to site are, in places are single track and unsuited to have construction traffic.

Drainage from the site would enter the Briscwm Stream, which feeds under the B4546 and then into the Afon Teifi SAC.

Consideration should be given to imported source materials and the potential impact on this area.

5.3 Construction Management

Highways which offer access to site are residential, in places are single track and unsuited to heavy construction traffic

A construction environment management plan should be provided`

5.4 Drainage and flooding

The proposed drainage system indicates the use of attenuation tanks and open ponds.

It is not clear from the information provided that the provision takes into account the volume of water which enters the site from adjacent areas as indicated by the introduction of additional drainage measure to intercept existing flow from the site².

² In 2016(?) Pembrokeshire County Council carried out works at Mwtshwr, and installed an additional 375mm diameter pipe to run alongside the original 225mm pipe. This system mainly intercepts water from the Awel y Mor site and carries it to the minor watercourse running northwards alongside the Public Footpath from Mwtshwr which in turn discharges into Briscwm Stream.

While the proposed drainage and attenuation may address this issue, if it does not address water running onto the site (see attached maps and video), the potential flooding impact on housing adjacent and below the site could be significant.

The site is known historically as 'the field of springs'. Springs and sink holes are a feature of the area.

Tan 15 does not specify any requirements for groundwater flood risk other than the risk of groundwater flooding should be considered. Displacement of groundwater flow could have as significant impact on local flooding.

(See Appendix E – Records of flooding of B4546 and Water Street 1953 to 2019 and Appendix F Appendix F – Briscwm Stream Catchment Area)

Given the locally known nature of the site¹ a full hydrological report should be provided and mitigations for incidents of flooding for areas around and below the site detailed as part of the drainage specifications.

The Community Council queries what arrangements will be put in place, in perpetuity,

5.5 Public space and playground

The provision of public open space, including the proposed exclusive trim trail around a 'closed' route it noted. The proposals are isolated from the wider general public within the development site due to the topography and access.

The Community Council queries what long term maintenance arrangements for the landscape areas and playground.

6. Travel and access

The developer references community and inclusion but it fails to effectively address accessibility to other village amenities and public transport links.

A development should contribute to 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, both within and around the development.

It should integrate into the fabric of the existing built environment.

6.1 Pedestrian and Cycle Access (see Appendix F)

The gradient of the only proposed road access to the development site, of about 1 in 7 together with its lack of pavements would deter many walkers and promote car use among residents Access to the wider village and its amenities are via Longdown Street and David Street.

Both are on an incline with the 'steep hill' on Longdown Street being referenced.

Neither road, by way of the incline or in particularly David Street with its narrow highway and lack of public footways, offers an inviting walk, particularly for young children and anyone with an infirmity.

While an active and independent pedestrian might make effective use of some of the driveways and narrow frontages to avoid traffic on David Street for the less active, and those managing young children it would be a challenge.

As a cycle route it would again, require a reasonably competent and confident cyclist to negotiate the inclines and narrow highways.

This suggests that for some residents the regular use of a car to access local amenities, including those in the village, may be essential.

Additional car journeys will impact on Longdown Street and its junction with David Street, and on David Street and junction of David Street with the B4546.

Both junctions have limited visibility.

A sloped path suitable for walkers, parents with pushchairs, cyclists should be created to link the site with the Mwtshwr.

While still requiring the partial use of David Street, with its challenges it would allow the steep slope of Longdown Street to be avoided.

6.2 Footpath access

The World recognised 870 mile Wales Coast Footpath running along the Mwtshwr immediately adjacent the Northern boundary of the development site (to which no access is proposed);

The Well Being of Future Generations Act which not only promotes health objectives but integration of communities rather than exclusion makes a link to the adjacent footpath network a significant consideration and would integrate new resident families with the wider community.

A further footpath connection between the Mwtshwr and the B4546 (road to Cardigan) 87/24C is within 5 metres of the development site. This is a shortcut into Cardigan and back for walkers, yet it is not accessible from the site

Linking the site to the well mapped and advertised network of 90+ local public rights of way that are a major asset to this community, would enable residents of this new development to meet and integrate with the village residents.

6.3 Public Transport

Appendix B shows a snapshot of local employment opportunities. Access to a high percentage of the identified jobs would not be possible using public transport (See Appendix C for an outline of available public transport services).

Again, this highlights the potential for an increase in journeys from the site.

From planning officers evaluation green meadow - ????

?????? Compare with requirements Inadequate standards of private amenity space to serve the dwellings. The proposed rear garden areas are generally considered to be too short to serve family dwellings and / or relate poorly to the proposed dwellings;

7. Biodiversity

A full ecology report should be provided.

8. Sewage infrastructure

While not the responsibility of the developer the current capacity of the sewage infrastructure in the village is questionable and the connection of a further 29 dwellings may cause increased egress of raw sewage, most particularly in Water Street. The Community Council feels it necessary to draw attention to this issue. (See appendix D).

Appendix A

Housing St Dogmaels

Housing in St Dogmaels is made up of Victorian terraced, semi and detached housing with most of the detached houses being of newer construction on the edges of the village, with the exception of a few farm houses.

Taken from Right move website:

Properties in St. Dogmaels had an overall average price of £252,000 over the last year.

The average selling price in Pembrokeshire is £268,515.00 so St Dogmaels is priced towards the top end of the market for Pembrokeshire due to its river and seaside location.

Average prices in St Dogmaels

Detached properties: average price of £308,500.

Semi-detached properties: average price £238,167.

Terraced properties: average price of £191,750

Average sale time, for North Pembrokeshire and South Ceredigion, from posting to acceptance of offer is approximately 16 weeks

At present there are 18 properties on the market in St Dogmaels.

There are:

2 x 1-bedroom flats

2 x 2-bedroom houses

7 x 3-bedroom properties priced from £200,00.00 to £525,00.00

6 x 4-bedroom properties priced from £250,00.00 to £450,00.00

1 x 7-bedroom property priced at £575,00.00

Period on housing market

1 x 4 bed 2 years

1 x 4 bed 1 year

2 x 4 bed 8 months

1 x 4 bed 6 months

1 x 7 bed 18 months

1 x 3 bed 13 months

1 x 3 bed 6 months

The average price of a 4-bedroom detached property in the village (as of 9/04/2023) is £407,00.00

it should be noted that several of the larger properties (8) have had their prices reduced from the original sale price suggesting that the demand for properties of this size is limited.

Appendix B

Snapshot of local labour market

From internet searches on 11/4/23

Covering

Cardigan

New Quay

Aberporth

Tanygroes

And surrounding area

Found 76 local jobs

11 are unpaid voluntary jobs

9 are paid over £30,000/ year (Full Time)

56 are paid under £30,000.

Of which;

17 are part time at less than £12/ hour

39 full time with a **maximum** annual salary of £22,000*

* Some are advertised as full time but then state hours as less than the standard 36-hour week and thus may not be full time. Many of these are advertised as salary of between £9 to £12/hour

4 state that the applicant must have a car as employment criteria, but as others are caring roles this would likely be the case also.

Of the paid jobs

20 are in Hospitality

15 are in Retail

9 are care or support work

22 range from office, veterinary, labouring, warehouse to healthcare (specialist role)

For information the Mortgage loan rate against income is set at 4.5 X Salary (maximum)

Appendix C

Public Transport

The village is served by the 408 bus service connecting the village to Cardigan. The Poppit Rocket service has been withdrawn.

There are only 6 buses a day (not hourly) which serve the Cardigan Integrated Health Centre (CIHC).

It has been estimated that in order to reach significant centres for employment and hospitals serving the area (including major A&E departments, notwithstanding the Minor Injuries Unit at the CIHC, for which there are 6 buses daily) one way journey times are (not inclusive of waits for service connections)

Aberystwyth (Bronglais hospital) + 1.25 to 2.25 hours from Cardigan

Carmarthen (Glangwili Hospital) + 1.75 hours

Haverfordwest (Withybush Hospital, currently 3 services a day) + 1.25 hours

The last 408 bus service between St Dogmaels and Cardigan leaves Cardigan at 16:44. It is therefore not feasible that future residents could use the service for commuting to full-time work and impacts the ability of residents to attend appointments and socialise, other than within the village.

The survey does not take account of the narrowing of Pilot Street which reduces to single lane traffic and the limited visibility to the North of the proposed access road which results, during peak tourist times, to gridlock.

Appendix D

Sewage outages – Water Street, St Dogmaels

Flooding and Sewage Outages Water Street St Dogmaels 2020 -2023

Water Street and B4546

August 2020

16th August **Sewage outage**

17th August **Sewage outage**

18th August **Sewage outage**

28th August **Sewage outage**

October 2020

3rd October **Sewage outage**

7th October **Sewage outage**

25th October **Sewage outage and Flooding across B4546**

29th October **Sewage outage**

30th October **Sewage outage**

Dec 2020

15th December **Sewage outage and Flooding across B4546**

17th December **Sewage outage**

Jan 2021

19th January **Sewage outage and Flooding across B4546**

20th January **Sewage outage**

21st January **Sewage outage**

-

Feb 2021

19th February **Sewage outage and Flooding across B4546**

20th February **Sewage outage and Flooding across B4546**

21st February **Sewage outage and Flooding across B4546**

22nd February **Sewage outage and Flooding across B4546**

23rd February **Sewage outage and Flooding across B4546**

2023

23rd March Sewage outage

'Overpumping'

Dwr Cymru's response to FOI:

The sewerage flow from St Dogmaels is pumped over to Cardigan WwTW (?Welsh Water Treatment Works) for full biological treatment and disinfection prior to continuous discharge into the Teifi.

There are however 4 CSO's (Combined Storm Overflows) located in St Dogmaels which do discharge into the Teifi intermittently during storm events³ and operate in order to protect the sewerage network and properties from flooding.

Please find attached the CSO discharge figures for the four CSO assets located in St Dogmaels and the discharge numbers and duration (hours) for 2020 – 2021 are provided in the Spill Figures tab.

The volume of storm discharges from these and all of our CSO's across our operating area in Wales is not recorded, therefore cannot be provided as our regulator only requires us to record each storm event and its duration.

We have also attached the total daily volumes (TDV) of treated effluent that is discharged from our wastewater treatment facility in Cardigan'

EDM Data St Dogmaels.xlsx [Protected View] - Microsoft Excel non-commercial use

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		2020		2021	
		Spills No	Duration (h)	Spills No	Duration (h)
St Dogmaels Main Ps	BH0074507	32	220.75	15	139
St. Dogmaels SPS No.2 CSO	BP0318101	115	2050.75	79	1518.5
St Dogmaels, Rear Of Ph, Maeshyfyd CSO	BH0074508	90	949.75	45	565.25
St Dogmaels CSO	BH0074511	3	0.75	2	0.5

2022	
Spills No	Duration (h)
0	0
85	1226
18	49
2	5

(St Dogmaels SPS No 2 CSO is the Combined Sewer Outflow to the North of the Moorings Slipway)

Combined Sewer Outflow discharge figures presented as days per year instead of hours

St Dogmaels SPS No 2 Combined Sewer Outflow (to the North of the Moorings Slipway)

2020: 2050.75 hours discharging untreated effluent into the Teifi

Equivalent to non-stop 85.45 days i.e. almost 3 months i.e. 1 in every 4.27

days

2021: 1518 hours discharging untreated effluent into the Teifi

³ For reference this would be equivalent to 'storm events' every 1 in 7.16 days (2022) at the Moorings end of St Dogmaels

Equivalent to non-stop 63.25 days i.e 2 months i.e. 1 in 6 days

2022: 1226 hours discharging untreated effluent into the Teifi
equivalent non-stop 51.08 days i.e 2 months i.e. 1 in 7.16 days

St Dogmaels, Rear of Public House Maeshyfyrd, Combined Sewer Outflow

2020: 949.75 hours discharging untreated effluent into the Teifi
equivalent non-stop 39.57 days i.e. 5.65 weeks i.e. 1 in every 9.22 days

2021: 565.25 hours discharging untreated effluent into the Teifi
equivalent non-stop 23.55 days i.e. 1 in 15.5 days

2022: 49 hours discharging untreated effluent into the Teifi
equivalent non-stop 2.04 days a year

St Dogmaels Main Pumping Station

2020: 220.75 hours discharging untreated effluent into the Teifi
equivalent non-stop 9.19 days a year

2021: 139 hours discharging untreated effluent into the Teifi
equivalent non-stop 5.79 days a year

2022: 5 hours discharging untreated effluent into the Teifi

Collated: Gill Wislocka 05 02 2022⁴ Updated 18 03 2023⁵

Appendix E – records of flooding of B4546 and Water Stree 1953 to 2019

1953-83	1984-93	1994-12	2013	2014	2015	2016	2017	2018	2019	
0-2paHS	0-2paHS	0-2paHS	August work starts on site	14/10/2014	10/01/2015	05/01/2016	03/01/2017	02/01/2018		
				07/11/2014	14/01/2015	07/01/2016	04/01/2017	05/01/2018		
						March foundation	09/01/2016	05/01/2017	09/01/2018	
							10/01/2016	22/01/2017	15/01/2018	

⁴ <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en>

<https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/sites-of-special-scientific-interest-responsibilities-of-owners-and-occupiers/?lang=en>

⁵ with 2022 data from Top of the Poops | Waterway | River Teifi (top-of-the-poops.org)

			opposite		for the	11/01/2016	26/01/2017	16/01/2018	
			Berwyn		2 houses adjacent	12/01/2016	02/02/2017	17/01/2018	
					B4546	13/01/2016	03/02/2017	21/01/2018	
					started	15/01/2016	04/02/2017	26/01/2018	
			15/12/2013			16/01/2016	21/02/2017	27/01/2018	
			16/12/2013			17/01/2016	01/03/2017	28/01/2018	
					?? When work started on lower plots?	18/01/2016	15/03/2017	29/01/2018	
						21/01/2016	17/03/2017	30/01/2018	
						22/01/2016	22/03/2017	16/02/2018	
						23/01/2016	14/04/2017	17/02/2018	
						24/01/2016	15/04/2017	18/02/2018	
						25/01/2016	17/04/2017	20/09/2018	
Exceptional	0-2paHS					26/01/2016	18/04/2017	18/12/2018	
High Tide	Flood				30/11/2015	27/01/2016	26/05/2017		
	Max 2pa at High Springs				03/12/2015	28/01/2016	02/06/2017		
					04/12/2015	29/01/2016	30/06/2017		
					06/12/2015	09/02/2016	01/07/2017		
					12/12/2015	10/02/2016	02/07/2017		
					24/12/2015	19/02/2016	15/09/2017		
					27/12/2015	01/03/2016	16/09/2017		
					28/12/2015	30/03/2016	18/09/2017		
					29/12/2015	31/03/2016	30/09/2017		
					30/12/2015	Awely Mor	08/10/2017		
					31/12/2015	Culverted	09/10/2017		
						05/04/2016	10/10/2017		
						21/04/2016	11/10/2017		

						26/07/ 2016	02/11/201 7		
						23/08/ 2016	03/11/201 7		
						01/09/ 2016	04/11/201 7		
						02/09/ 2016	16/11/201 7		
						05/09/ 2016	17/11/201 7		
						28/09/ 2016	21/11/201 7		
						03/10/ 2016	22/11/201 7		
						17/10/ 2016	23/11/201 7		
						18/10/ 2016	28/11/201 7		
						19/10/ 2016	29/11/201 7		
						20/10/ 2016	Culvert cleared		
						21/10/ 2016	09/12/20 17		
						24/11/2 016	10/12/20 17		
						09/12/ 2016	15/12/20 17		
						23/12/ 2016	16/12/20 17		
						29/12/ 2016	17/12/20 17		
							21/12/20 17		
							22/12/20 17		
							28/12/20 17		
0-2	0-2	0-2	Two	Two	Thirtee n	Forty five	Forty nine	Sixtee n	

Appendix F – Briscwm Stream Catchment Area



Appendix F Pedestrian /Cycle Strategy

A considered inclusive strategy would recognise the following:

1. The Active Travel Act, which encourages walking and cycling to work and school and aims to make foot and cycle journeys as straightforward as possible and reduce car use;
2. The World recognised 870 mile Wales Coast Footpath running along the Mwtshwr immediately adjacent the Northern boundary of the development site (to which no access is proposed);
3. The Well Being of Future Generations Act which not only promotes health objectives but integration of communities rather than exclusion. Making a link to the adjacent footpath network would integrate new resident families, walkers etc;
4. Another footpath connection between the Mwtshwr and the B4546 (road to Cardigan) 87/24C is within 5 metres of the development site. This is a shortcut into Cardigan and back for walkers, yet it is not accessible from the site;
5. The gradient of the only proposed road access to the development site, of about 1 in 7 together with its lack of pavements would deter many walkers and promote car use among residents;

6. Having only one access out of the site for pedestrians via Longdown Street adds:
 - a. 260 metres to any journey from the social housing on the site to use facilities of St Dogmaels village / nearest bus stop compared with the creation of a new footpath/cycle link to Mwtshwr;
 - b. 475 metres for the pedestrian journey into Cardigan if an access was constructed from the site boundary onto the Mwtshwr running adjacent to the site boundary.
7. Linking the site to the well mapped and advertised network of 90+ local public rights of way that are a major asset to this community, would enable residents of this new development to meet and integrate with the village residents.

Consequently, a sloped path suitable for walkers, parents with pushchairs, cyclists should be created to link the site with the Mwtshwr.

In addition, consideration should also be made for present and future local wheelchair users to use this possible new link to Mwtshwr who at present brave the gradients and traffic of Longdown Street. Many modern electric wheelchairs can cope with steeper gradients than manual wheelchairs and an off-road link to Mwtshwr into the village centre would be much safer than progressing down Longdown Street.

Without this path link to the Mwtshwr:

- A. the development is discriminatory in that those least likely to have a car will have to walk 250m further than most other residents of the development site to the centre of the village and its facilities and nearest bus stop, and 475 metres further if walking into Cardigan.
- B. The developer is encouraging car use as few people will choose to walk up or down the steep gradient (about 1:7) of Longdown Street (mostly without pavement here) as well as the challenge of the narrow pavementless David Street.