



**JMS PLANNING & DEVELOPMENT**

**GREEN INFRASTRUCTURE STATEMENT**

**FOR THE**

**ERECTION OF A NEW TRAINING CENTRE**

**BUILDING AND ASSOCIATED WORKS.**

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Project: Training Centre

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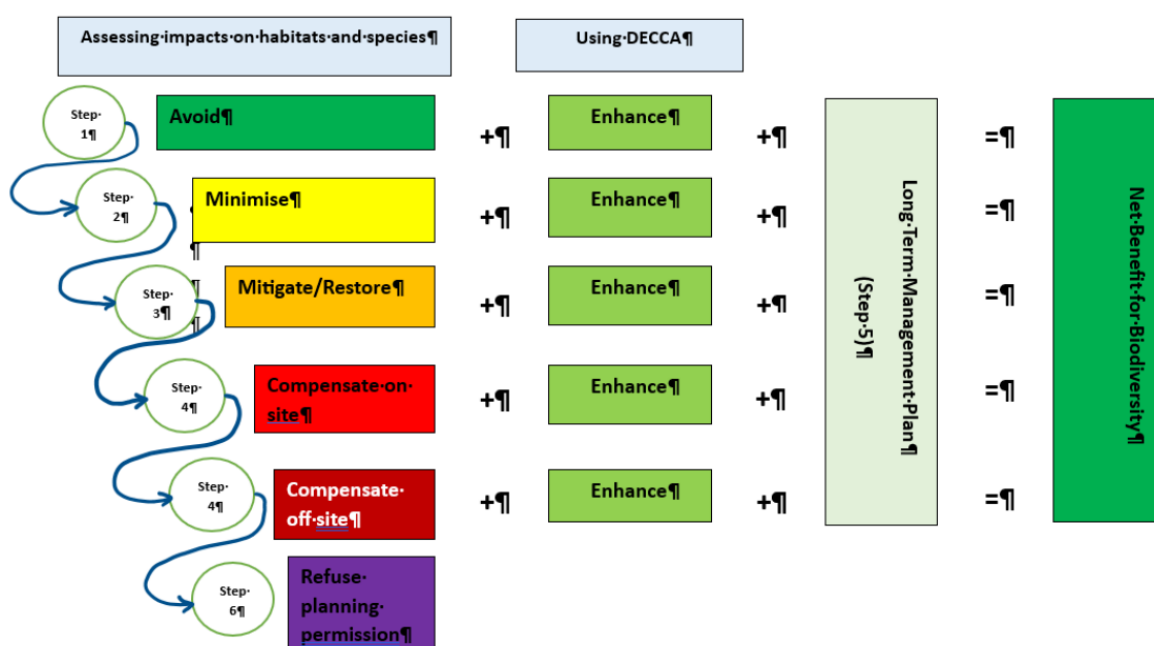
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## SECTION I: INTRODUCTION

- 1.1 JMS Planning & Development have been instructed, by Newcastle Emlyn Rugby Football Club Ltd (the applicant) to submit a Green Infrastructure Statement following the amendment to Planning Policy Wales (Ed 12), Chapter 6 (Feb 2024) in support of the erection of a training centre and associated works at Newcastle Emlyn Rugby Club.
- 1.2 PPW states that Green Infrastructure Statements (GIS) should be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal.
- 1.3 PPW also states that for minor development this will be a short description and should not be an onerous requirement for applicants, however, the GIS should positive multi-functional outcomes which are appropriate to the site.
- 1.4 The step-wise approach has been used throughout this assessment.

Figure 1X: Summary of the Step-Wise Approach



The Step-Wise Approach



## SECTION 2: SITE AND SURROUNDING AREA

- 2.1 The application site refers to a parcel of land immediately adjacent to the existing NCE clubhouse building. Albeit that the application site is not strictly located within the settlement boundary of NCE or Adpar the site borders the settlement of Adpar, some 480 meters to the East and immediately borders the settlement boundary of NCE, again, to the East.
- 2.2 It's acknowledged within the LDP that there is a symbiotic relationship between the settlements of Newcastle Emlyn and Adpar therefore, Adpar is given status as an Urban Service Centre (USC) as opposed to a 'Linked Settlement' of Newcastle Emlyn. USC's are deemed the focus of LDP strategy owing to their diverse range of services and facilities playing a strategic role for the county.
- 2.3 The settlement of Adpar, and the surrounding NCE settlement, is the fourth most populated area in Ceredigion (behind Aberystwyth, Cardigan and Lampeter), with nearly 2000 residents. The A475 connects Lampeter to Cardigan with the application site located along this route – unique street reference number: 47100542.
- 2.4 NCE has a sub-regional role and provides pivotal functions of employment, housing, education, recreation and tourism within the area, thus providing numerous jobs, facilities, services and community uses in the surrounding area.
- 2.5 Although the application site is not allocated within the LDP for any specific use, the application site has been home to NCE rugby club for the last 33 years and is widely accepted as a sporting ground.
- 2.6 In total, the applicants control approximately 11 acres of land which currently accommodates the access off the A475, the clubhouse, hardstanding and car parking areas, spectator stands with 3 rugby pitches.
- 2.7 The application site in total measures approximately 2.5 hectares and mainly consists of hardstanding, scrubland and improved grassland in the form of the training pitch. However, the main aspect of the proposal, the training centre, measures 2357 square meters.

- 2.8 To the North, the application site is bound by hedgerows and trees along the A475 and beyond this, the Cilgwyn Mansion, which forms part of the SSSI. The East of the site mainly comprises of grassland and scrubland which also contains non-native and invasive species. The South of the site is the main car parking area and further South the 1 of the rugby pitches is located. Immediately to the West of the site, the existing clubhouse is located, and a further 85 meters beyond the clubhouse, the Afon Teifi (SAC/SSSI) meanders around the castle.
- 2.9 Assessing the latest flood map for planners (FMfP) the application site mainly sits outside Flood Zones 2 & 3, however, part of the proposed development is located within Flood Zone 2 and a marginal parcel potentially located within Flood Zone 3. The application includes a Flood Consequence Assessment which should be read in conjunction with this statement.
- 2.10 For the avoidance of doubt, the application site does not fall within statutory designated areas such as SPA, conservation areas or non-statutory designated areas such as Special Landscape Areas (SLA). However, it is acknowledged that the Adpar Conservation Area is located within close proximity, as is the Teifi Valley SLA.
- 2.11 There are a number of heritage assets within the surrounding area, namely the scheduled monuments of NCE castle and bridge and listed various listed buildings situated throughout the town.
- 2.12 The table below assesses the site in terms of its features:

| Feature                      | Assessment   |
|------------------------------|--|
| Geodiversity (RIGS)          | No designation / No Impact   |
| National Landscape Character | NLCA40 – Teifi Valley.<br>The Teifi River meanders gently but eventually become incised in places. Steeply incised wooded riverbanks, with gorse clad outcrops, hanging oak woodland, coniferous forests and quarries sit within the wider lowland landscape of the Teifi Valley. Unusually the tidal lower river extends into the thickly wooded, |

|                    |   |
|--------------------|---|
|                    | <p>steep-sided Cilgerran Gorge. The river emerges and widens into an estuary at the town of Cardigan. It ultimately issues into the sea through a modest sized sandy bay between rocky headlands. The valley is predominantly rural and enclosed for agriculture. There are a wide variety of field sizes and areas with thick hedgerows, mainly enclosing pastures. The small towns of Tregaron, Lampeter, Llanybydder, Llandysul, Newcastle Emlyn and the larger town of Cardigan lie along its course. Many of them grew up as bridging or defensive points, although their morphology varies a lot.</p>   |
| Historic Landscape | <p>Value - High</p> <p>A good example of a Ceredigion agricultural floodplain landscape. It contributes to the general historic landscape character of the wider region.</p> <p>Apart from Llandyfriog church, there are no buildings, but two bridges cross the river where the valley narrows to c. 50m wide. Pont Henllan is an 18th century single arch bridge of Teifi valley slate with a date stone of 1774, and Allt-y-Cafan Bridge is also built of local stone with a single arch and a date stone of 1839. Both are listed buildings. Former turnpike roads the A484, A486 and A475 - run along the edge of the floodplain for part of their courses, and in places cross it. Mortared walls flank these roads for short sections. The heavily wooded embankment of a dismantled railway that runs almost the entire length of the floodplain is a distinctive landscape element. A sports field, sewage works and caravan site have recently been established on the floodplain</p> |
| Visual and Sensory | <p>Value - High</p> <p>Attractive and distinctive valley, prominent along the southern county boundary and forming a key</p>  |

|                      |  |
|----------------------|--|
|                      | <p>gateway landscape into the county from the south. The area retains a consistent character throughout and contains a number of important settlements which contain historic features, and these add further interest.</p> <p>Valley varies in width from a wooded gorge to an intimate valley with a wider floor. Throughout pasture fields are defined by low uniform hedges with trees and steep valley sides are clothed with woodland. This is mainly deciduous, although some coniferous plantations occur in places. Along the valley floor, settlements are focused on traditional crossing points of the river and comprise stone built buildings, with stone bridges forming focal points. In part, the valley is accessed by the A484 and other busy roads extending to Cardigan and Newcastle Emlyn and these allow excellent views along the valley in places. A number of tributary valleys are incised into higher land to the north and these are also wooded to a large extent. Throughout the river provides a central linear feature adding movement and interest as it meanders through the valley. The valley is intimate in places and contains a wealth of elements that provide human scale, so that the valley has a settled character throughout.</p> |
| Geological Landscape | <p>Value – Outstanding</p> <p>Includes GCR / SSSI features of national / international importance. Typically, broad floodplain and meandering channel of the Afon Teifi (Quaternary, Holocene) from the Tregaron area past Lampeter, Llandysul and Newcastle Emylyn to the tidal limit near Cilgeran, SE of Cardigan. Includes incised, gorge-like sections cutting into bedrock near Cenarth and downstream in the Cilgeran area.</p>   |
| Landscape Habitats   | Value – Outstanding  |



|                                  |   |
|----------------------------------|---|
|                                  | <p>The river and surrounding network of habitats contains a good proportion of nationally important habitats with a very diverse flora and fauna.</p> <p>This aspect area is made of up the woodlands, parkland and meadows which follow the Afon Teifi and its tributaries down the Teifi valley. The communities make a rich mosaic with two very notable areas, one of parkland and neutral species rich grassland and one of untouched woodlands. The river itself is important for a number of rare aquatic species.</p> |
| Agricultural Land Classification | 3b - Moderate Quality Agricultural Land   |



## SECTION 3: GREEN INFRASTRUCTURE

- 3.1 Green infrastructure is necessary not just to soften the impact that development has on our natural environment, but to ensure that it contributes a biodiversity net gain that results in an enhancement of the site compared to the pre-development baseline.
- 3.2 Ensuring that there is a suitable network of green infrastructure is a key concern as not only will it benefit local flora and fauna, but also the people which reside in areas with larger amounts of green infrastructure as a means of contributing to better health and well-being.
- 3.3 Green infrastructure must consider the local context and character as taking design cues from local habitat types while also serving local community needs.
- 3.4 Green infrastructure must deliver public benefits for all both directly and indirectly, including recreational and health and wellbeing benefits.
- 3.5 The application site mainly comprises of a hard standing area and scrubland which is currently used for overflow car parking. The more significant and higher quality habitats such as the hedgerow to the North will be retained in situ. Albeit that the application site lacks ecological significance, there is scope to improve this and provide green infrastructure at the site. PPW notes that green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment. Recreational spaces, such as this, is considered to contribute to the area's green infrastructure which promotes social, mental and physical well-being.
- 3.6 PPW acknowledges that green infrastructure can be formed by many different components of varying scale, from large scale wetlands, through to small scale urban interventions. This proposal will benefit biodiversity via the installation of bird and bat boxes, removal of non-native invasive species, retention of hedgerows and the planting of new species. The proposal will enhance accessibility and provide appropriate SUDS at the site. Where possible, the proposal will include biodiversity enhancements to ensure a resilient ecosystem.



- 3.7 The developer is committed to improving the overall well-being and health of the community and the environment by enhancing biodiversity on site and encouraging green infrastructure hence the siting of the application site which avoids the reduction of open space.



## SECTION 4: BIODIVERSITY NET BENEFIT

- 4.1 The annexe to the letter by the Chief Planning Officer dated 11<sup>th</sup> October 2023 explains that:

“Biodiversity underpins the structure and functioning of ecosystems. It is the diversity of living organisms whether at the genetic, species, habitat or ecosystem level. An ecosystem is made up of living organisms, plants, animals and micro-organisms, in conjunction with their non-living environment, air, water, minerals and soil, and all the diverse and complex interactions that take place between them.”

- 4.2 **Extent:** The application highlights that the proposal is for the erection of a training centre at the existing rugby ground, on a parcel of hardstanding and scrub land directly adjacent the existing clubhouse. The site is of little to no ecological value, with limited suitable habitats for priority species. However, consideration must be given to the hedgerows and trees to the North of the application site. The applicant understands the need to plan for every individual development proposal to avoid negative impact on existing biodiversity and is committed to maintaining and enhancing biodiversity on the site. The proposal is likely to have no impact on ecology or biodiversity at the site, moreover, the aim is to enhance the ecosystem.
- 4.3 **Condition:** The site is located adjacent the existing clubhouse (East of clubhouse) and to the North-West of one of the existing rugby pitches. The site mainly comprises of hard standing and scrub land. However, the site is located within close proximity to a hedgerow including trees to the North of the site. A preliminary protected species assessment was undertaken and concluded that the site was of was mainly of no ecological significance, although the trees and hedgerows to the North were of minor/local significance. The site unsuited to protected species such as badgers, amphibians and reptiles with the intended development unlikely to have an ecological consequence.
- 4.4 **Connectivity:** Opportunities will arise for the development to be connected to the biodiversity and ecological networks which exist currently on and around the application site. The installation of bat and bird boxes is considered appropriate and should be located where they are unlikely to be affected by the existing floodlighting on-site. There may be opportunities to remove non-



native and invasive species to promote the re-establishment of native species which would benefit the local biodiversity. Furthermore, there may be scope to enhance existing hedgerows to the North of the site creating a natural stepping stone to wider areas. At lower level, and of a smaller scale, it would be possible to include bee and bug hotels on site to potentially promote further biodiversity on-site. It is advised that planters are installed on site, which would aid in softening any perceived impact whilst enhancing the provision of flora.

- 4.5 **Adaptation:** Sustaining the habitats and associated species in the longer term is key, through proper management of the site and by securing the green infrastructure already present around the site and promoting its use into the future.



## SECTION 5: PROTECTION OF SITES OF SPECIAL SCIENTIFIC INTEREST

- 5.1 The site does not form part of land within a Site of Special Scientific Interest, however, it is acknowledged that the Afon Teifi SSSI and Old Cilgwyn and Cae Heslop SSSI are located to the West and North, respectively.
- 5.2 The Old Cilgwyn and Cae Heslop SSSI is known to have bat roosts in the surrounding area and the addition of the bat boxes at the development site would provide a wildlife corridor enabling protected species to move from one area to another.



## SECTION 6: TREES AND WOODLANDS

- 6.1 The annexe to the letter by the Chief Planning Officer dated 11<sup>th</sup> October 2023 explains that:
- “Trees, hedgerows, groups of trees and areas of woodland are of great importance for biodiversity. They are important connecting habitats for resilient ecological networks and make an essential wider contribution to landscape character, culture, heritage and sense of place, air quality, recreation and local climate moderation. They also play a vital role in tackling the climate emergency by locking up carbon, and can provide shade, shelter and foraging opportunities, wider landscape benefits such as air and diffuse pollution interception, natural flood management, and building materials. The importance of trees, in particular urban trees, in creating distinctive and natural places which deliver health and well-being benefits to communities, now and in the future should be promoted as part of plan making and decision taking. Planning authorities must promote the planting of new trees, hedgerows, groups of trees and areas of woodland as part of new development.”
- 6.2 There are currently no trees within the application site, however, there are trees located within the hedgerow to the North of the site. There is approximately a 7-meter buffer from the nearest point of the training centre to the trees to the North. No removal works are required to enable the development and each of the existing trees shall be retained as part of the proposal.
- 6.3 The applicant is advised to explore the possibility of planting additional trees to the North, providing the planting area is within the ownership of the Club and the planting of trees would not have a negative impact on the adjacent highway.



## SECTION 7: CONCLUSION

- 7.1 To conclude, the development of the application site will not result in damage or a negative impact on biodiversity or on the function of existing ecosystems. The site is located on land which is of no ecological value on an existing area of hardstanding associated with the rugby club which is used for car parking.
- 7.2 The application site provides an opportunity to deliver a net benefit of biodiversity in its development with the inclusion of bird boxes, bat boxes, bee and bug hotels and planters on site. In addition the removal of non-native invasive species, such as the Japanese Knotweed identified on site, would benefit the wider area.
- 7.3 The proposal has followed the step-wise approach in accordance with PPW and it is considered that the proposal avoids the loss of habitats or negative impacts to biodiversity.
- 7.4 The enhancements delivered are commensurate with the size, scale and nature of the development given the nature of the proposal and site in question.