

# Design and Access Statement

Land West of High Street, Brynheulog, St  
Clears, Carmarthen, SA33 4ET

December 2021



## Summary of the proposal

This document has been prepared by Amity Planning Ltd on the behalf of Obsidian Developments Ltd and Ansellton Ltd.

This statement supports the submission of a full planning application that seeks permission for residential development of 66 dwellings together with access, landscaping, drainage and associated works at land adjacent to Brynheulog, St Clears, Carmarthen, SA33 4ET.

The purpose of this Design and Access Statement (DAS) is to provide a clear demonstration of how the objectives of good design and placemaking have been addressed and how the proposed planning submission has been arrived at in a considered, logical and creative way that considers the site and its context.

The statement identifies how the scheme responds to the relevant policy and guidance on design and placemaking. The statement also explains how the design evolution has responded positively to the comments and input from wide range of local authority departments and demonstrates how we have worked in partnership with the local authority to arrive at the scheme before us today.

## The Brief and Vision

The development of land at land adjacent to Brynheulog, St Clears offers an excellent opportunity to provide high quality houses within easy walking distance of the town centre, schools, community services and leisure facilities.

The development encourages a sustainable way of living through the design of a distinctive, high-quality place. The provision of green corridors and open space through the site will cater for pedestrian and cycle paths, which will improve connectivity and promote healthy, happy living.

### **Vision Objectives**

#### *A New Residential Area*

- The creation of a new residential area for St. Clears that provides high quality homes as well as integrating sensitively with the residential and light industrial areas in the proximity of the site.
- The provision of green infrastructure that enhances biodiversity and ecology, reinforces the sense of place and creates opportunities for social and community cohesion.

#### *Sustainably Located*

- Aid sustainable connections to surrounding services and facilities including a convenience store, surgery, food establishments, visitor accommodation, a public house, local shops, leisure centre and a primary school, to name a few.
- The promotion of active travel and environmental-friendly modes of transport through the linkage of the scheme to the existing pedestrian infrastructure and bus service nearby.
- Enhancement of underutilised greenfield land for the provision of much-needed housing in a location immediately adjacent to the urban grain of St Clears.

	<p><u>A distinctive, high quality place</u></p> <ul style="list-style-type: none"> <li>Utilising elements of the existing context to inform both the form and identity of the development including buffer planting, trees and the A40 slip-off road.</li> <li>The provision of a sufficient and appropriate mix of housing types and tenures that is affordable, decent and designed to a high standard for a range of socioeconomic profiles.</li> <li>The density of the development is appropriate which maximises the efficient use of the land with a sustainably-lead design approach.</li> <li>The provision of green spaces with a range of uses including children’s playspace and informal open space.</li> <li>The promotion of healthier lifestyles through the reasonable walking distance to local services and facilities, appropriate network of footpaths, and availability of public bus service nearby.</li> </ul>
<p><b>Site and Context Analysis</b></p>	
<p><b>Site context</b></p>	<p>The built-up area of St Clears expands to the north and south of the A40 trunk road. The site is within the southern section of the village. It is part of a parcel of greenfield land flanked by the linear development abutting High Street and a large cluster of properties off the roundabout between A40 and A47.</p> <p>The historic core of the village is located to the north of A40 where most of the local services and facilities are located. A shared bridge for pedestrians and motor vehicle users crosses the A40 and connects the southern and northern parts of the village. Figure 1 is an extract of the Carmarthenshire Adopted LDP Policies Map that shows the limits of St Clears settlement and how the site is integrated with it.</p> <p>To the north of the site, there is a A40 slip road linking with High Street and a storage/commercial site opposite the slip road. To the east of the site are a cluster of properties accessed from High Street. To the west is a cul-de-sac housing estate. To the south, Heol Goi is a single-track lane that serves a few cottages and provides vehicular access from/to High Street and properties off the roundabout between A40 and A47. Figures 2 and 3 show images of these locations to understand the visual relationship between the site and the neighbouring land.</p>
<p><b>Site opportunities</b></p>	<p><u>Opportunities</u></p> <ul style="list-style-type: none"> <li>Allocated site for housing development by Camarthenshire Adopted LDP</li> <li>Proximity to local services and facilities by means of active travel.</li> <li>Prominent site from A40 roundabout</li> <li>Potential for good connections with surrounding transport infrastructure (A40, High Street and bus)</li> <li>The site has the lowest flood risk probability</li> <li>No coal mining risk</li> </ul>

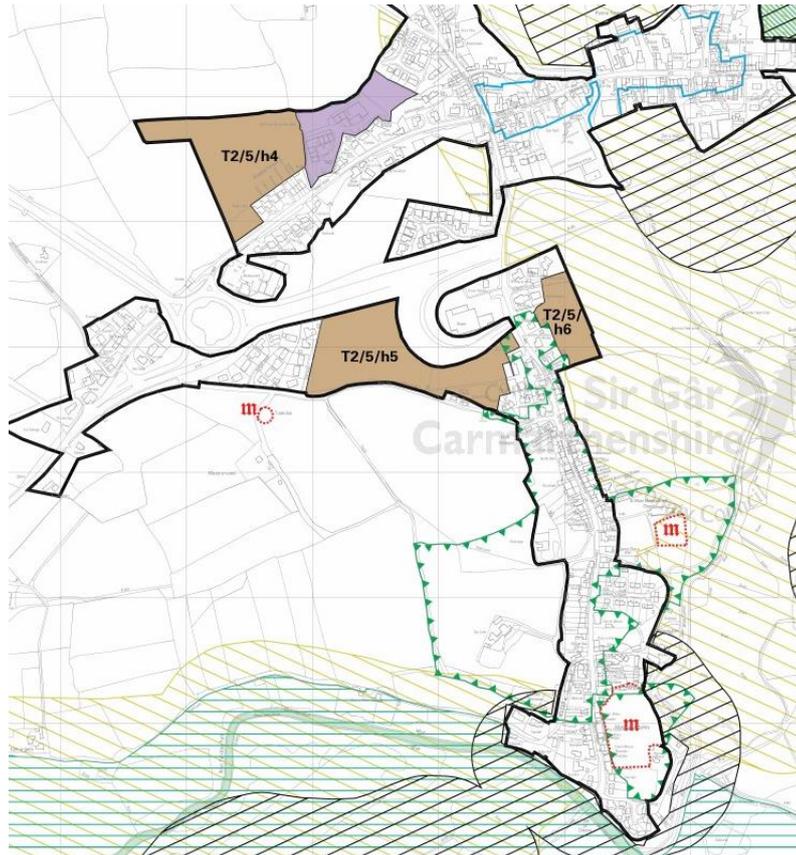


Figure 1. St Clears on the Carmarthenshire Adopted LDP Policies Map. The site and adjoining land to west is T2/5/H5.



Figure 2. Views of the site from the adjacent land (Source: Google Street View). From top to bottom, A40 slip road with the site to the right; Heol Goi looking westwards; and existing site access from High Street.



*Figure 3. Views of the site from the adjacent land (Source: Google Street View).  
From top to bottom: Heol Gai facing westwards with adjoining property to the right;  
and southern-west corner of the site onto the junction between Heol Gai (right) and Cae Glas (left)*

<p><b>Site constraints</b></p>	<p><u>Constraints</u></p> <ul style="list-style-type: none"> <li>• Sloping topography which requires geotechnical engineering works</li> <li>• Potential highways impact to the network</li> <li>• Potential noise pollution from A40</li> <li>• No existing sewage and drainage infrastructure</li> <li>• Need for a robust biodiversity and ecological enhancement scheme</li> </ul>
<p><b>Relevant policy and guidance</b></p>	<p>Planning policies and guidance which are relevant to the extent they will influence the design of the proposed development are identified below.</p> <p><i>1. Carmarthenshire Local Development Plan</i></p> <p>The site and its wider location falls within the administrative boundaries of Carmarthenshire County Council. The Carmarthenshire Local Development Plan (LDP) was adopted in December 2014. The LDP sets out the spatial vision for the future of Carmarthenshire (excluding that area within the Brecon Beacons National Park) and a framework for the distribution and delivery of growth and development. It sets out land-use planning policies and proposals which are used in the determination of planning applications and in guiding future opportunities for investment and growth.</p>

The relevant policies are as follows:

- SP1 – Sustainable Places and Spaces
- SP5 – Housing
- SP6 – Affordable Housing
- SP13 – Protection and Enhancement of the Built and Historic Environment
- SP14 – Protection and Enhancement of the Natural Environment
- SP17 – Infrastructure
- GP1 – Sustainability and High Quality Design
- GP2 – Development Limits
- H2 – Housing within Development Limits
- AH1 – Affordable Housing
- EQ1 – Protection of Buildings, Landscapes and Features of Historic Importance
- EQ4 – Biodiversity
- TR3 – Highways in Developments – Design Considerations
- EP2 – Pollution
- EP3 – Sustainable Drainage

## 2. *Supplementary Planning Guidance (SPG)*

Supplementary Planning Guidance (SPG) is produced to provide further detail on certain policies and proposals contained within the Carmarthenshire Local Development Plan (LDP). They help ensure certain policies and proposals are better understood and applied more effectively. It is advised to take them into account in determining planning application albeit their lower status against LDP policies.

The relevant guidance documents are as follows:

- Nature Conservation & Biodiversity
- Planning Obligations
- Affordable Housing
- Place Making & Design

## Interpretation

The findings of the site and context analysis and the content of the relevant policies and guidance provide the framework to deliver the design of the development in line with the vision objectives of the scheme that were set out initially.

### **CONCEPT DESIGN**

- Erection of 66 dwelling houses with a mix of sizes and tenures to cater the needs of a wide range of residents.
- Potential for good connection to the existing highway infrastructure (High Street, A40) through new roadway that will be adapted to the site constraints.
- Use of existing site access on High Street and upgrade of arrangements including appropriate visibility splays and new pedestrian link with existing footways.
- Landscaping proposals in conjunction with biodiversity/ecology measures to retain significant elements and enhance the existing low ecological value of the grassland.

- The provision of 3 no. attenuation basins with a two-fold function: ensuring sustainable drainage and creating informal open space.
- Location of the northern plots set back as much as possible from A40 and off slip to mitigate noise impact to the residents.

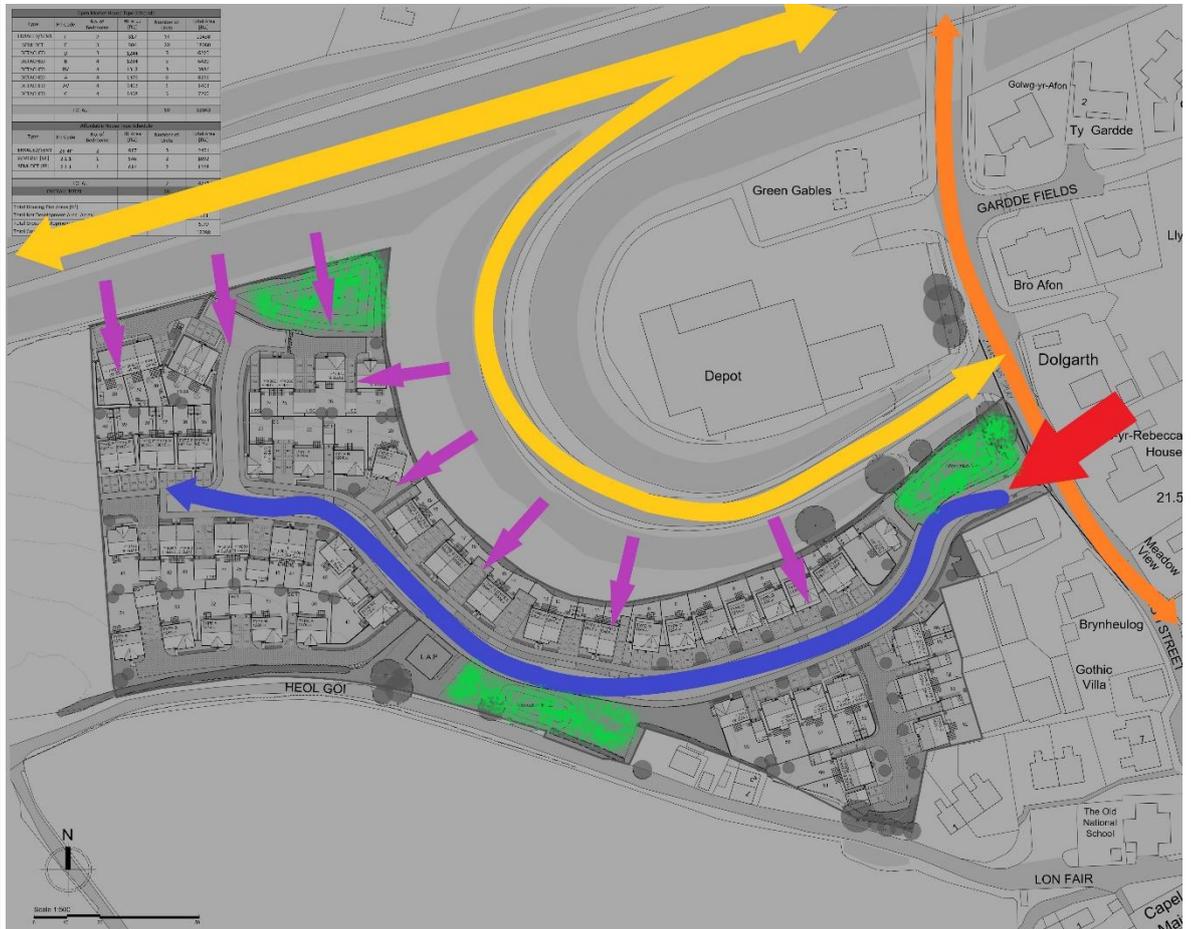


Figure 4. Concept Design overlaid on the Site Location Plan

## Design Development

### Pre-Application Advice

Planning advice was sought to the Local Planning Authority prior to the submission of the planning application. A preliminary site layout and site location plan were the most relevant documents enclosed with the pre-application enquiry.

In accordance with Town and Country Planning (Pre-Application Services) (Wales) Regulations, the Planning Team provided detailed advice on 7<sup>th</sup> October 2020 (Application No: PRE/00537) in response to our enquiry.

The proposed development received good reviews subject to the submission of further details and improvement of certain aspects of the scheme as follows:

- A noise survey is recommended, and any necessary mitigation should be included to ensure the proposal is not adversely affected by noise.

	<ul style="list-style-type: none"> <li>• A Contaminated Land Risk Assessment is recommended</li> <li>• A Construction Environmental Management Plan (CEMP) including dust mitigation should be submitted.</li> <li>• The swept path analysis should demonstrate that large refuse vehicles and emergency vehicles could manoeuvre internally allowing it to exit in forward gear without obstructing/encroaching any other part of the estate roadway.</li> <li>• Discussions about off-site highway improvement are recommended with South Wales Trunk Road Agency.</li> <li>• A Preliminary Ecological Assessment, survey results and biodiversity enhancement measures will be required with a planning application.</li> <li>• Full cross sections will be needed along with finished floor levels of the dwellings given the raised topography of the site in relation with the neighbouring land.</li> <li>• Full analysis of the capacity and the structure of the ponds would be needed to ensure they do not over top or breach with safety implications for the trunk road.</li> <li>• Plot 56 appears isolated and at odds with the rest of the proposal. It also has a drainage connection beneath the house. The parking and angle of drive is not acceptable, and it should be removed. I suggest that the area be landscaped for ecology enhancement as required.</li> <li>• Plot 57 does not sit comfortably and appears to be 90 degrees to the street scene. It is noted that it has two dwellings in close proximity to the South so the orientation and relationship needs to be carefully considered.</li> <li>• Plot 61 is close to the private access road to the East so the relationship between the Plot and the houses to the East needs careful consideration, especially boundary treatment.</li> <li>• The site is in a 30% Affordable Housing area. Should less than 30% be proposed, a full viability analysis will be required for assessment.</li> <li>• A detailed analysis of open space in the vicinity along with any on-site provision will need to be carried out to establish the final open space figure</li> </ul>
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## The Proposal

<i>Character</i>	<p>The site is strategically allocated by the Adopted Carmarthenshire LDP for housing development up to 40 units. However, the proposed scheme has been designed with a provision of 66 dwellinghouses.</p> <p>As described above, an analysis of the site and its context has been undertaken, and opportunities and constraints for developing the site have been also identified. On balance, it has been concluded that there is further capacity to increase the density of the development without compromising high quality design standards of the whole scheme. In this regard, the pre-application advice supports that when it states, “the overall number is significantly higher than the LDP allocation, however it does not look overly cramped”.</p> <p>An appraisal of the wider street scene nearby the site has been carried out to ascertain the character of the area in architectural terms and use the findings to inform the design and layout of the scheme and, in particular, the dwellinghouses.</p> <p>In short, the detached two-storey house with gable pitched roofs and rendered walls is the most dominant type across the street scene in the surroundings of the site (see Figure 5). In general, the proposed buildings do not differ substantially from that and architectural elements (e.g, window sills and lintels) will be introduced to the external fabric to be in keeping with the semi-rural character where the site lies in.</p>
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*Figure 5. Street scene in the surroundings of the site.*

*From top to bottom: High Street near the site access; High Street towards the junction with Heol Goi; and Cae Glas facing the western site boundary.*

*Access*

The existing field access in High Street will remain as an access point to the proposed estate. It provides excellent linkage to High Street (both northwards and eastwards) and A40 via the adjacent slip-road. Furthermore, no major upgrade works are required to make it fully compliant with CCC's Highways Design Guide.

A Transport Statement by Hydrock has been enclosed to the suite of PAC documents in order to demonstrate that the development will not give rise to any unacceptable cumulative impact to the highway network.

In particular, visibility splays of 2.4m x 43m will be provided at the junction between the site access and High Street. This is satisfactory to ensure that drivers can enter and egress the site in a safe manner. A new link will be constructed to connect the proposed northern footway with the existing footway to the north. Improvement will be also carried out to the A30 off slip crossing point with tactile paving on the dropped kerbs.

*Movement*

There is good footway provision within St Clears providing connectivity to services and facilities within the town. The proposals ensure that residents have convenient access to the highway infrastructure, especially by means of active travel.

	<p>Pedestrian access within the site is provided by a proposed 2-metre-wide footway on both sides of the internal access road which links to the footways on High Street as described above. From these internal footways, the residents will have access to each dwelling by foot.</p> <p>Cyclists will access the site on-carriageway via the proposed access. There is limited cycling infrastructure within the vicinity of the site. However, it is noted that the relatively flat, lightly trafficked, and low speed roads within the vicinity of the site are suitable for cycling.</p> <p>The nearest bus stops to site are located on High Street (Co-op Bus Stops), approx. 90m north of the proposed site access. The stops are served by bus services 221, 222, 223, 224 and 322. Although the frequency is relatively low, the bus service is another alternative to the use of private cars.</p> <p>With regards to the motor vehicle movements, a junction assessment has been undertaken of the site access/High Street and demonstrates that the junction operates well within its maximum capacity in view of the anticipated car movements throughout any day.</p> <p>The Transport Statement produced by Hydrock also addressed concerns about the manoeuvres of large refuse vehicles and emergency vehicles within the site that were pointed out in the pre-application advice.</p>
<p><i>Environmental Sustainability</i></p>	<p>Green infrastructure is integrated into the site layout. The aim is to preserve and mitigate from the development impact a few significant biodiversity and ecology elements on the site. Moreover, it enhances the current low ecological value of the site.</p> <p>A Preliminary Ecological Assessment by Habitat Matters Ltd concluded that retention and mitigation should be mainly provided for the southern boundary hedgerow and dark corridor along the hedgerow and woodland boundaries. The measures for ecological enhancement are numerous and range from the integration of bat boxes and bee brick in all houses to hedgerow gateway. A Bat Scoping &amp; Activity Report by Habitat Matters Ltd has been also prepared to identify how relevant the bat presence is on the site. The conclusion is there is no significant bat roosting and the impact of the development to the bats can be appropriately mitigated and enhanced.</p> <p>The Landscaping Strategy by Tir Collective complements the ecological measures designed by Habitat Matters Ltd. The provision of 3 no. SUDS basins will allow the attenuation of flooding from surface water and at the same the pollination by the planting of a local seed mix. New trees, shrubs, hedgerows and grass areas for private gardens and open spaces will be strategically planted across the estate.</p> <p>An Arboricultural Impact Assessment by ARW concludes that the trees proposed for removal have no significant value and their loss can be mitigated in the short term due to their size and maturity. It is confirmed that those trees directly impacted by the proposals (alteration and/or encroachment on their root protection areas) could be adequately controlled by a suitable arboricultural method statement and tree protection plan.</p> <p>Blue infrastructure has been also provided for the development in the interest of water management and public protection. Following the compulsory introduction of SABS approval on 7th January 2019, which required all schemes over 100m sq to achieve SABS approval, the scheme has been designed in a manner to include such sustainable drainage solutions.</p>

	<p>A Drainage Strategy by CB3 Consulting Ltd. takes into account the role of hard and soft landscaping features such as the attenuation basins and permeable pavement. Both systems for surface water and foul water are separated as per engineering requirements for new development. A full SABs application will be submitted in tandem with the planning application to obtain approval of the drainage strategy.</p> <p>Given the proximity of the development to the trunk road A40, a Noise Impact Assessment by Wardel Amstrong surveyed the noise impact from the trunk road to the site and concluded that the future residents will not be unacceptably impacted by the noise levels. A set of measures however have been recommended to mitigate any disturbance to the occupiers of a few properties including a 1.8 metre high close boarded fence, double glazing for the room facing A40 and trickle vents.</p>
<p><i>Community Safety</i></p>	<p>Throughout the design of the development, community safety has been considered in order to create a reduced risk of crime and a sense of safety through natural surveillance.</p> <p>The scheme uses a traditional layout with dwellings fronting onto a single access road and pedestrian footpath. Windows on the front elevations provide good natural surveillance over the street and front gardens. There are no main access routes to the side and rear of the properties which would create opportunities for crime.</p> <p>A clear definition has been provided across the scheme between the public street, the semi-public front gardens and the private rear gardens. The proposed boundary treatment is of varied height and opacity in plots and open spaces. For instance, low level hedges are provided in the front gardens to aid natural surveillance and avoid creating hiding places.</p>
<p><i>Response to planning policy</i></p>	<p>The proposed development is aimed at providing housing at a prominent and strategic location. The site is underutilised grassland well-located within the urban settlement of St Clears. It benefits from strategic designation for housing development as set out in Policy SP4 of the Adopted Carmarthenshire LDP.</p> <p>The aim of the proposal will meet the social need of the local community for further housing. The principle of developing the site for housing is in line with the strategic allocation provided by LDP. The western field will be excluded from the proposal. The Joint Housing Land Availability Study Report dated August 2019 confirms that the Local Planning Authority is not currently able to demonstrate a 5-year housing land supply as the supply is 3.5 years. Furthermore, the lack of delivery for this site has been demonstrated over the last years to the extent that the site is no longer allocated throughout the current revision of the LDP. Therefore, the principle of development has been established and the nature of the proposal is clearly appropriate.</p> <p>A robust analysis of the site and its context has been undertaken to understand the character of the area and deliver a high-quality designed scheme that relates well with the surrounding land and uses. As shown in detail below, the design principles and guidance has driven the placemaking insofar as the development complies with LDP Policy GP1 and Place Making &amp; Design SPG.</p> <p>The new scheme has taken into account the accessibility to the highway network and provided improvements where appropriate, especially to promote active travel and ensure good highway safety in line with LDP Policy TR3. Likewise, ecology and landscaping assessment and a suite of measures have been accordingly undertaken to prevent any detrimental impact upon the natural environment in accordance with LDP Policies SP13 and EQ4.</p>

The houses have been designed to cater the needs of different profiles of resident, including appropriate delivery of affordable housing as per LDP Policy AH1. The use of external materials and building layout respond satisfactorily to the established character in the vicinity of the site.

The drainage strategy is based on the incorporation of Sustainable Drainage Systems (SUDS) to mitigate flooding from surface water and separate systems to prevent deterioration of water quality.

The noise levels from A40 have been surveyed and assessed to ascertain noise levels. The outcome is that no noise pollution will occur and any adverse impact to a few properties can be effectively mitigated. The approach to the issue of noise accords with LDP Policy EP2

In summary, this Design and Access Statement demonstrates that the objectives of good design and placemaking have been addressed throughout the evolution of the proposed scheme and that the development responds satisfactorily to relevant planning policies and guidance.