

Planning Statement

Land at Heol Goi, St Clears
Camarthen

August 2024

amity
planning consultants



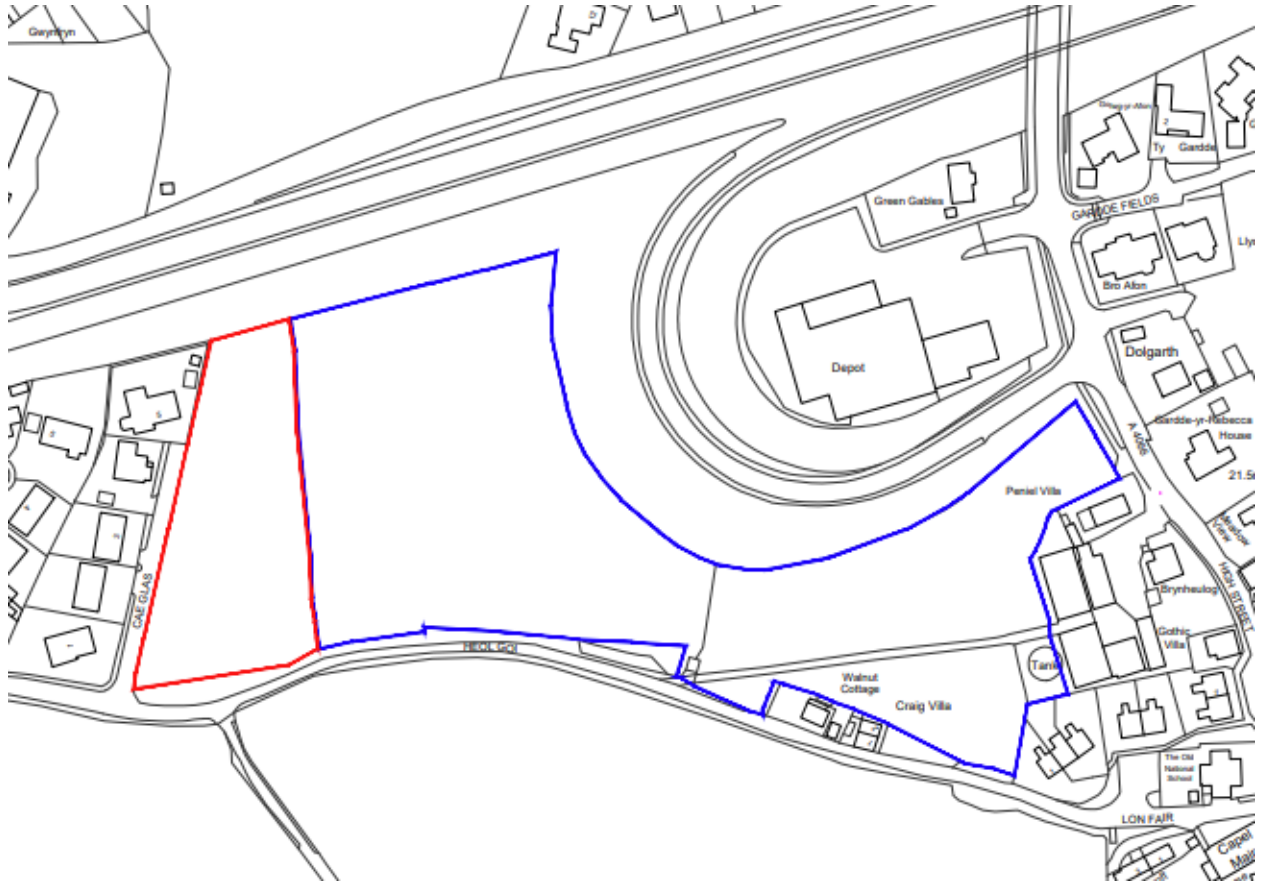
Introduction

Client This statement has been prepared on behalf of Obsidian Homed Ltd.

Scope This statement accompanies a full planning application for residential development, landscaping, drainage and associated works at Heol Goi, St Clears.

Site Details

Site Location **Fig.1 Site Location Plan**



Site Description The site at Heol Goi consists of a parcel of greenfield land situated within a primarily residential and light industrial area of St Clears. It forms Phase 2 of the existing housing estate to the east. The application site is within the settlement development limits of St Clears and is allocated for residential development in the adopted Local Development Plan (LDP).

St Clears is a built-up area that expands to the north and south of the A40 trunk road. The site is located in the southern section of the village, bordered to the west by the development abutting Cae Glas. The historic core of the village, where most local services and facilities are located, lies to the north of the A40. A shared bridge for pedestrians and motor vehicles crosses the A40, connecting the southern and northern parts of the village.

The application site primarily comprises improved grassland. Along the northern edge of the field is a narrow strip of marshy grassland and poor-quality semi-improved grassland. The site is also bordered by hedgerows and trees to the north.

Development Proposals

The Scheme

The development of land at Heol Goi, St Clears, presents an exceptional opportunity to provide high-quality housing within easy walking distance of the town centre, schools, community services, and leisure facilities. This development promotes a sustainable way of living through the creation of a distinctive, high-quality residential area. The development furthermore serves as a suitable extension to the existing estate to the east, fulfilling the remaining allocation designated within the Local Development Plan (LDP).

The proposed scheme is designed to provide 12 new homes, including one affordable dwelling to address the housing needs of the local area. A comprehensive analysis of the site and its context has been conducted, leading to the thoughtful conclusion that there is ample capacity to accommodate 12 housing units without compromising high-quality design standards or the amenity of neighbouring properties.

Architecturally, the proposed buildings harmonise with the adjacent St Clears development, ensuring a cohesive and aesthetically pleasing streetscape. The design prominently features detached, two-storey houses with gable pitched roofs and rendered walls, which are characteristic of the surrounding area. The roofs will be finished in Marley Modern smooth grey tiles, and the walls will feature a combination of natural white and cream through-colour render, along with red facing brick. Boundary treatments will comprise of close board fences, brick screen walls and timber knee rails. This choice of materials and design elements ensures that the new development is in keeping with the local architectural vernacular.

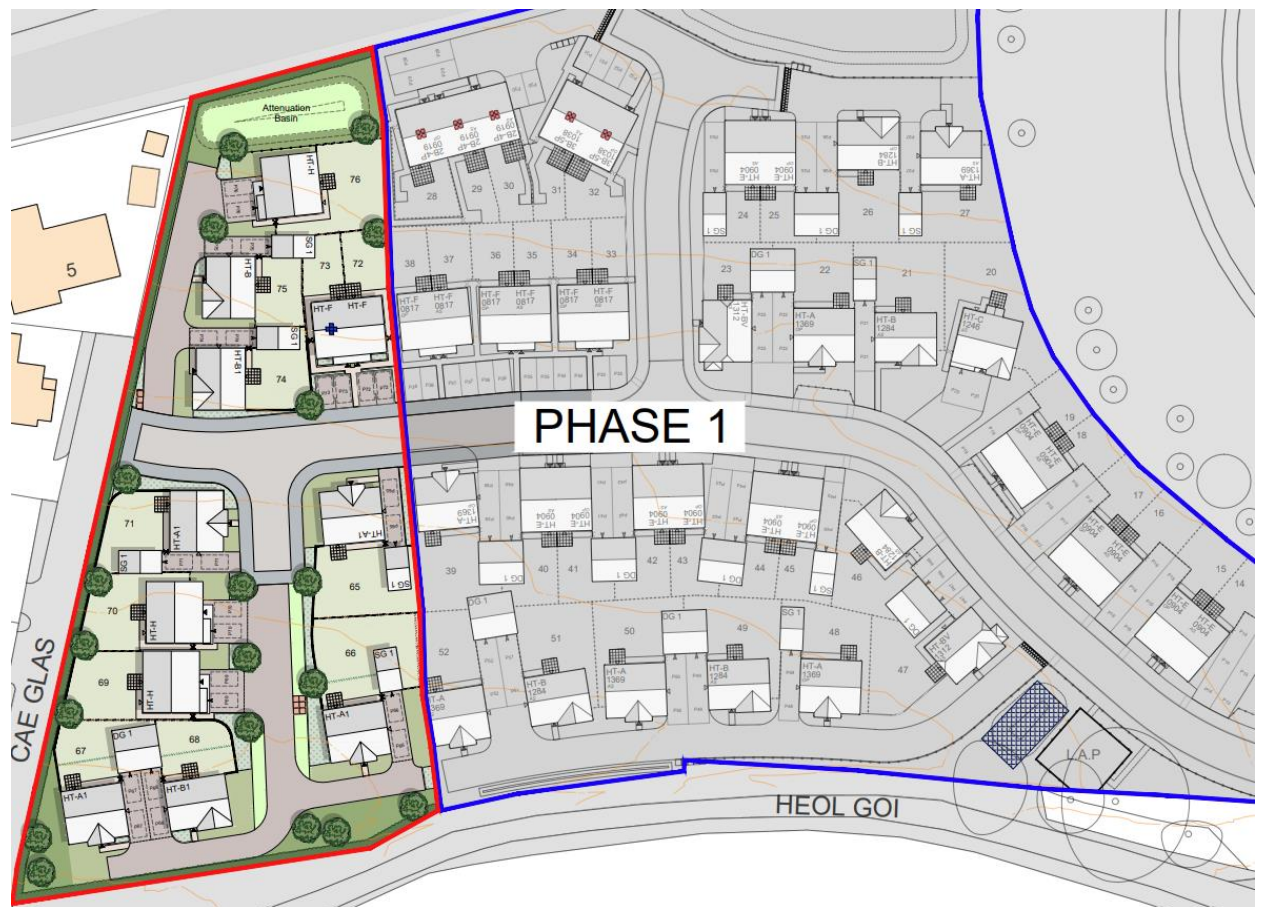
A detailed Settings Impact Assessment has been conducted to ensure appropriate measures are taken to safeguard the setting of the existing ancient monument. These measures are discussed in detail within this document, demonstrating the applicant's commitment to preserving the historical and cultural heritage of the area.

Access to the development is planned to extend from the internal road running through the adjacent development to the east, incorporating a hammerhead turnaround for efficient traffic flow. The dwellings to the north and south will be served by private driveways, with on-plot parking provided to meet the needs of residents. This layout ensures safe and convenient access for all users.

To address water management and prevent flooding, an attenuation basin is proposed at the northern end of the site. A clear, unobstructed route for surface water drainage will span from the south to the north, ensuring effective management of runoff.

The Green Infrastructure of the site has been carefully assessed and enhanced, resulting in a net positive impact. Strategic planting choices, including rain gardens and pollinator-friendly species, will be introduced to promote biodiversity and environmental sustainability.

Fig.2 Site Layout



Relevant Planning Policy

Approach

In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, development must be carried out in accordance with the development plan (in this case the adopted Carmarthenshire County Council Local Development Plan) unless material considerations indicate otherwise.

The Development Plan for the area comprises of the Carmarthenshire Local Development Plan (LDP) 2006 – 2021 together with Future Wales – The National Plan 2040. Relevant material considerations in this instance are identified as including Planning Policy Wales, various Technical Advice Notes, and adopted Supplementary Planning Guidance.

Adopted Local Development Plan (2006-2021)

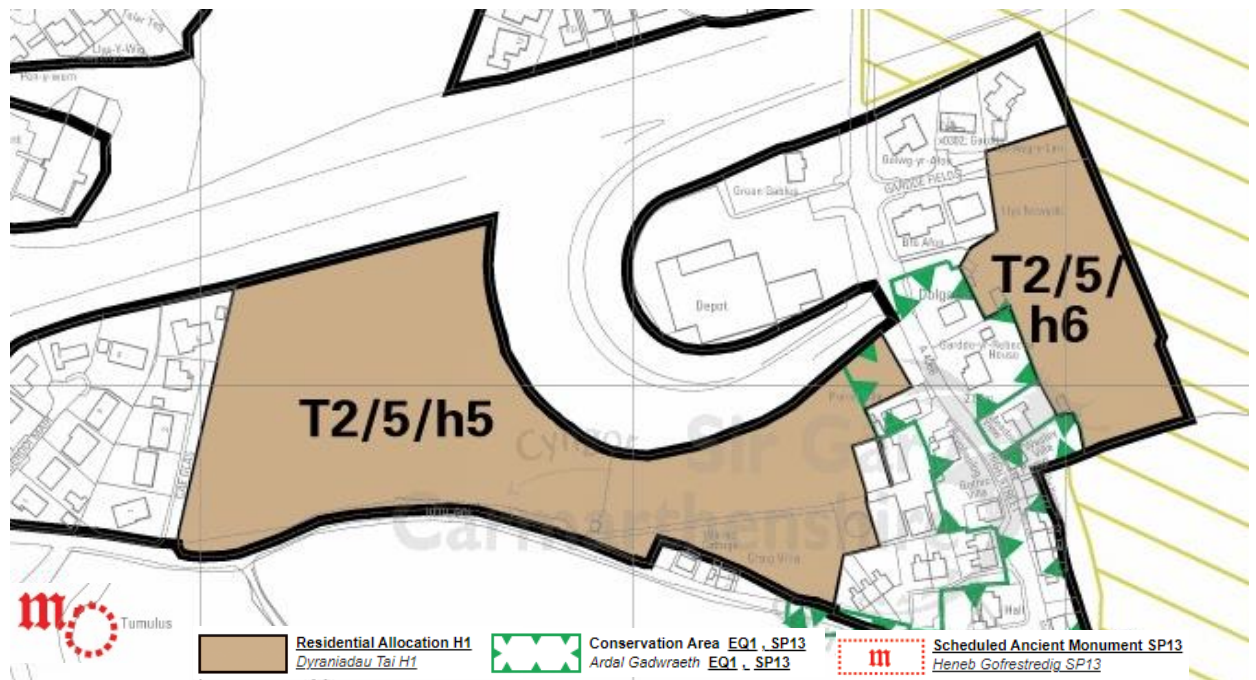
The adopted LDP provides the statutory framework for the development and use of land within Carmarthenshire over the Plan period (2006-2021). The policies and details contained within this LDP is used by Carmarthenshire County Council to guide and control development and provide the statutory local policy context for determining planning applications.

As per the adopted LDP, the Site comprises of the following designations:

- Allocated for Residential Development (T2/5/h5)
- Located within a 500m to a designated Ancient Monument.

- Designated as located within St Clears “Service Centre” per the settlement distribution framework.

Fig.3 LDP Allocation (LDP Proposals Map)



The most relevant policies of the Carmathenshire County Council Local Development Plan to the scheme are identified below:

Policy SP1 – Sustainable Places and Spaces

Proposals for development will be supported where they reflects sustainable design principles by:

- Distributing development to sustainable locations in accordance with the settlement framework, supporting the roles and functions of the identified settlements;
- Promoting, where appropriate, the efficient use of land including previously developed sites;
- Integrating with the local community, taking account of character and amenity as well as cultural and linguistic considerations;
- Respecting, reflecting and, wherever possible, enhancing local character and distinctiveness;
- Creating safe, attractive and accessible environments which contribute to people’s health and wellbeing and adhere to urban design best practice;
- Promoting active transport infrastructure and safe and convenient sustainable access particularly through walking and cycling;
- Utilising sustainable construction methods where feasible;
- Improving social and economic wellbeing;
- Protect and enhance the area’s biodiversity value and where appropriate, seek to integrate nature conservation into new development.

The LDP categorises settlements into a hierarchy which reflects their relative sustainability according to the availability of services or facilities, or through general accessibility benefits. The Plan's aspiration of minimising the need to travel, particularly by private motor car, and its contributory role towards the facilitation of an integrated transport strategy seeks to direct development to appropriate locations which serve to achieve this.

Policy SP2 – Climate Change

Development proposals which respond to, are resilient to and adapt to the causes and impacts of climate change will be supported. In particular proposals will be supported where they:

- a) Adhere to the waste hierarchy and in particular the minimisation of waste; Promote the efficient consumption of resources (including water);
- b) Reflect sustainable transport principles and minimise the need to travel, particularly by private motor car;
- c) Avoid, or where appropriate, minimise the risk of flooding including the incorporation of measures such as SUDS and flood resilient design;
- d) Promote the energy hierarchy by reducing energy demand, promoting energy efficiency and increasing the supply of renewable energy;
- e) Incorporate appropriate climate responsive design solutions including orientation, layout, density and low carbon solutions (including design and construction methods) and utilise sustainable construction methods where feasible.

Proposals for development which are located within areas at risk from flooding will be resisted unless they accord with the provisions of TAN 15.

Policy SP3 – Sustainable Distribution

Provision for growth and development will be at sustainable locations in accordance with the settlement framework. For the purposes of Policy SP3 the development site is located within "St Clears Service Centre".

Policy SP5 – Housing

In order to ensure the overall housing land requirement of 15,197 for the plan period 2006-2021 is met, provision is made for 15,778 new dwellings. Sufficient land is allocated (on sites of 5 or more dwellings) to accommodate 13,352 dwellings in accordance with the Settlement Framework.

A total of 1,666 houses are planned within Service Centres.

Policy SP6 – Affordable Housing

Provision will be made for at least 2,121 affordable homes to be delivered through the LDP. The delivery of affordable homes will contribute to the creation of sustainable communities within the Plan area.

Policy SP9 – Transportation

Provision is made within the LDP to contribute the delivery of an efficient, effective, safe and sustainable integrated transport system through:

- a) Reducing the need to travel, particularly by private motor car; Addressing social inclusion through increased accessibility to employment, services and facilities;
- b) Supporting and where applicable enhancing alternatives to the motor car, such as public transport (including park and ride facilities and encourage the adoption of travel plans), and active transport through cycling and walking;
- c) Re-enforcing the function and role of settlements in accordance with the settlement framework; Promoting the efficient use of the transport network;
- d) The use of locational considerations for significant trip generating proposals, with design and access solutions within developments to promote accessibility by non car modes of transport.

Policy SP11 – Renewable Energy & Energy Efficiency

Development proposals which incorporate energy efficiency measures and renewable energy production technologies will be supported in areas where the environmental and cumulative impacts can be addressed satisfactorily.

Such developments will not cause demonstrable harm to residential amenity and will be acceptable within the landscape. Each proposal will be assessed on a case-by-case basis.

Policy SP12 – Waste Management

Policy SP12 seeks to ensure the management and disposal of waste close to where it has been generated, in accordance with the proximity principle; proposals for development should have regard to the location of waste management facilities (and their capacity) in formulating proposals.

Policy SP13 – Protection and Enhancement of the Built and Historic Environment

Development proposals should preserve or enhance the built and historic environment of the County, its cultural, townscape and landscape assets (outlined below), and, where appropriate, their setting. Proposals relating to the following will be considered in accordance with national guidance and legislation:

- a) Sites and features of recognised Historical and Cultural Importance;
- b) Listed buildings and their setting; Conservation Areas and their setting;
- c) Scheduled Ancient Monuments and other sites of recognised archaeological importance.

Policy SP14 – Protection and Enhancement of the Natural Environment

Development should reflect the need to protect, and wherever possible enhance the County's natural environment. All development proposals should be considered in accordance with national guidance/legislation and the policies and proposals of this Plan, with due consideration given to areas of nature conservation value, the countryside, landscapes and coastal areas, including those outlined below:

- a) Statutory designated sites including Ramsar sites, SPAs, SACs, SSSIs and National Nature Reserves;
- b) Biodiversity and Nature Conservation Value, including protected species and habitats of acknowledged importance as well as key connectivity, corridors and pathways

Policy SP17 - Infrastructure

Development will be directed to locations where adequate and appropriate infrastructure is available or can be readily provided. The LDP therefore supports the economic provision of infrastructure by allocating sites in identified settlements and in accordance with the Settlement Framework.

Policy SP18 – The Welsh Language

The Council will support and promote the Welsh language by ensuring that there are sufficient and proportionate employment and housing opportunities to retain Welsh-speakers throughout Carmarthenshire.

Policy GP1 – Sustainability and High Quality Design

Development proposals will be permitted where they accord with the following:

- a) It conforms with and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing, elevation treatment, and detailing;
- b) It incorporates existing landscape or other features, takes account of site contours and changes in levels and prominent skylines or ridges;
- c) Utilises materials appropriate to the area within which it is located; It would not have a significant impact on the amenity of adjacent land uses, properties, residents or the community;
- d) Includes an integrated mixture of uses appropriate to the scale of the development;
- e) It retains, and where appropriate incorporates important local features (including buildings, amenity areas, spaces, trees, woodlands and hedgerows) and ensures the use of good quality hard and soft landscaping and embraces opportunities to enhance biodiversity and ecological connectivity;
- f) It achieves and creates attractive, safe places and public spaces, which ensures security through the ‘designing-out-crime’ principles of Secured by Design (including providing natural surveillance, visibility, well lit environments and areas of public movement);
- g) An appropriate access exists or can be provided which does not give rise to any parking or highway safety concerns on the site or within the locality;
- h) It protects and enhances the landscape, townscape, historic and cultural heritage of the County and there are no adverse effects on the setting or integrity of the historic environment;
- i) It ensures or provides for, the satisfactory generation, treatment and disposal of both surface and foul water;
- j) It has regard to the generation, treatment and disposal of waste. It has regard for the safe, effective and efficient use of the transportation network;
- k) It provides an integrated network which promotes the interests of pedestrians, cyclists and public transport which ensures ease of access for all;
- l) It includes, where applicable, provision for the appropriate management and eradication of invasive species.

Policy GP2 Development Limits

Development Limits are defined for those settlements identified as Growth Areas, Service Centres, Local Service Centres and identified Sustainable Communities within the settlement framework.

Proposals within defined Development Limits will be permitted, subject to policies and proposals of this Plan, national policies and other material planning considerations.

Policy GP3 – Planning Obligations

The Council will, where necessary seek developers to enter into Planning Obligations (Section 106 Agreements), or to contribute via the Community Infrastructure Levy to secure contributions to fund improvements to infrastructure, community facilities and other services to meet requirements arising from new developments.

Where applicable, contributions will also be sought towards the future and ongoing maintenance of such provision either in the form of initial support or in perpetuity. In implementing this policy schemes will be assessed on a case-by-case basis.

Policy GP4 – Infrastructure and New Developments

Proposals for development will be permitted where the infrastructure is adequate to meet the needs of the development. Proposals where new or improved infrastructure is required but does not form part of an infrastructure provider's improvement programme may be permitted where it can be satisfactorily demonstrated that this infrastructure will exist, or where the required work is funded by (or an appropriate contribution is provided by) the developer.

Policy H1 – Housing Allocations

Land has been allocated for residential development for the plan period 2006 – 2021 at those locations as set out below, and as depicted on the Proposals Map. Proposals for the residential development of allocated housing sites submitted in the form of a Full Planning application or as a Reserved Matters application should be accompanied by a layout of the proposal in its entirety to ensure the site is developed to its full potential.

T2/5/h5	Adjacent to Brynheulog	0	40
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The site is part of a wider allocation, and forms phase 2 of the above LDP designation.

Policy TR2 – Transport Considerations

Proposals which have a potential for significant trip generation will be permitted where:

- a) It is located in a manner consistent with the plans strategic objectives, its settlement framework and its policies and proposals; It is accessible to non car modes of transport including public transport, cycling and walking;
- b) Provision is made for the non-car modes of transport and for those with mobility difficulties in the design of the proposal and the provision of on site facilities;
- c) Travel Plans have been considered and where appropriate incorporated.

Proposals which have the potential to generate a significant number of trips either as an origin, or as a destination (including residential, employment, retail and leisure) will be expected through design, to maximise accessibility by alternative modes of transport.

Improving accessibility is an important objective of the Plan with the location of new developments important in ensuring accessibility can be maximised. The rural nature of the

County raises challenges in this regard, but proposals will be expected and encouraged to achieve this.

Policy AH1 – Affordable Housing

A contribution to affordable housing will be required on all housing allocations and windfall sites. The Council will seek a level of affordable housing contribution of 30% in the higher viable areas, 20% in the middle viable areas, and 10% within the Ammanford / Cross Hands sub-market areas.

Where viability at the target levels cannot be achieved, variation may be agreed on a case-by-case basis.

On Site Contributions - The affordable housing will be required to be provided on proposals of 5 or more dwellings in all settlements. Where adjacent and related residential proposals result in combined numbers meeting or exceeding the above threshold, the Council will seek an element of affordable housing based on the affordable housing target percentages set out above. Proposals will be required to ensure that the dwelling remains affordable for all subsequent occupants in perpetuity.

Commuted Sums - Where an open market residential site falls below the above thresholds, a contribution through a commuted sum towards the provision of affordable housing will be sought. The level of contribution sought through a commuted sum will vary based upon its location within the high, medium and low viability sub-market areas as set out above. Commuted sum charges will be based on floor space (cost per sq.m).

Policy SP6 and background evidence has identified variations in residual values achieved across the County and this is reflected within this policy. The Council will seek to maximise contributions on sites where it is deemed to be viable to do so, up to the 30%, 20% and 10% affordable housing targets identified for the submarket areas as set out below and identified on the Proposals Map. The Council will use these targets as the starting point on viability negotiations.

Policy AH1 acknowledges the role of negotiations and where applicable, allows the Local Planning Authority and developers to agree upon an affordable housing target if a lower viability is justifiable and necessary for a development to come forward.

- Llandovery, Llandeilo and North East Carmarthenshire – 30%
- St Clears and Rural Hinterland – 30%
- Carmarthen and Rural – 30%
- Carmarthen West - 20%
- Newcastle Emlyn and Northern Rural Area – 20%
- Kidwelly, Burry Port, Pembrey and Lower Gwendraeth Valley – 20%
- Llanelli – 20%
- Ammanford / Cross Hands – 10%

Policy TR3 – Highways Design Considerations

The design and layout of all development proposals will, where appropriate, be required to include:

- a) An integrated network of convenient and safe pedestrian and cycle routes (within and from the site) which promotes the interests of pedestrians, cyclists and public transport;
- b) Suitable provision for access by public transport;
- c) Appropriate parking and where applicable, servicing space in accordance with required standards; Infrastructure and spaces allowing safe and easy access for those with mobility difficulties;
- d) Required access standards reflective of the relevant Class of road and speed restrictions including visibility splays and design features and calming measures necessary to ensure highway safety and the ease of movement is maintained, and where required enhanced;
- e) Provision for Sustainable Urban Drainage Systems to allow for the disposal of surface water run off from the highway.

Proposals which do not generate unacceptable levels of traffic on the surrounding road network and would not be detrimental to highway safety or cause significant harm to the amenity of residents will be permitted.

Proposals which will not result in offsite congestion in terms of parking or service provision or where the capacity of the network is sufficient to serve the development will be permitted.

Policy TR4 – Cycling and Walking

Land required to facilitate the following improvements to the cycle network will be safeguarded. Proposed routes where known are shown on the proposals map. The potential opportunity for horse riding should where appropriate be considered.

- a) Towy Valley (between Llandeilo and Carmarthen);
- b) Whitland to Llanglydwen;
- c) Ammanford to the Amman Valley.

Developments should, where appropriate seek to incorporate, or where acceptable, facilitate links to the cycle, rights of way and bridleway network to ensure an integrated sustainable approach in respect of any site.

Policy EQ1 – Protection of Buildings, Landscapes and Features of Historic Importance

Proposals for development affecting landscapes, townscapes buildings and sites or features of historic or archaeological interest which by virtue of their historic importance, character or significance within a group of features make an important contribution to the local character and the interests of the area will only be permitted where it preserves or enhances the built and historic environment.

Policy EQ4 Biodiversity

Proposals for development which have an adverse impact on priority species, habitats and features of recognised principal importance to the conservation of biodiversity and nature conservation will not be permitted, except where it can be demonstrated that:

- a) The impacts can be satisfactorily mitigated, acceptably minimised or appropriately managed to include net enhancements;
- b) There are exceptional circumstances where the reasons for the development or land use change clearly outweighs the need to safeguard the biodiversity and nature conservation

interests of the site and where alternative habitat provision can be made in order to maintain and enhance local biodiversity.

The potential impacts, either individually or cumulatively of a development, should be carefully considered in determining any proposal. In this regard, the impact of noise, vibration, drainage, lighting and traffic considerations may have implications during construction or once any development is completed.

Policy EP2 - Pollution

Proposals for development should wherever possible seek to minimise the impacts of pollution. New developments will be required to demonstrate that they:

- a) Do not conflict with National Air Quality Strategy objectives, or adversely affect to a significant extent, designated Air Quality Management Areas (permitted developments may be conditioned to abide by best practice); Do not cause a deterioration in water quality;
- b) Ensure that light and noise pollution are where appropriate minimised;
- c) Ensure that risks arising from contaminated land are addressed through an appropriate land investigation and assessment of risk and land remediation to ensure its suitability for the proposed use.

Policy EP3 – Sustainable Drainage

Proposals for development will be required to demonstrate that the impact of surface water drainage, including the effectiveness of incorporating Sustainable Drainage Systems (SUDS), has been fully investigated.

The details and options resulting from the investigation must show that there are justifiable reasons for not incorporating SUDS into the scheme in accordance with section 8 of TAN 15.

Developments will be required to incorporate separate and independent drainage systems for the disposal of both foul and surface water on site.

Policy REC2 – Open Space Provision and New Developments

All new residential developments of five or more units will be required to provide on site open space in accordance with the Council's adopted standards of 2.4ha per 1000 population.

In the event that the above standards cannot be met on site, or where there is sufficient existing provision already available to service the development, then off site financial contributions will be sought as and where appropriate.

The above policy provides the means to achieve the standards set out within the Green Space Study. Reference should be given to policy GP3 with regards to planning obligations and developer contributions.

**Future Wales:
The National
Plan 2040**

Future Wales: The National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It forms part of the development plan and provides a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

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

Fig.5 The Seven Goals of the Well-being of Future Generations (Wales) Act 2015



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

- Policy 1 – Where Wales will Grow
- Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking
- Policy 3 – Supporting Urban Growth and Regeneration – Public Sector Leadership
- Policy 5 – Supporting the Rural Economy
- Policy 11 – National Connectivity
- Policy 12 – Regional Connectivity

**Planning Policy
Wales**

Planning Policy Wales (11th Edition, February 2021) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions.

Paragraph 2.8 acknowledges that “planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales” and “the most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making planning policy and decision making” as per Paragraph 2.9.

PPW defines placemaking as a “holistic approach to the planning and design of development and spaces, focused on positive outcomes”. This approach “considers the context, function and relationships between a development site and its wider surroundings” and “adds social, economic,

environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary”.

Fig. 6 PPW Themes Collectively Contribute to Placemaking (extract from PPW Edition 11)



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

1. STRATEGIC & SPATIAL CHOICES

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

Good Design

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

1) *Access and Inclusivity*

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

2) *Environmental Sustainability*

Paragraph 3.7 states that “developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement (Paragraph

3.7)” and be resilient through “an integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, the adaptability of buildings and site treatment”

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

3) *Character*

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

4) *Community Safety*

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

5) *Movement*

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

2. ACTIVE & SOCIAL PLACES

Transport

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

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

With regards to vehicle parking, Paragraph 4.1.50 advises that a design-led approach should ensure that “appropriate level of car parking is integrated in a way which does not dominate the

development". Paragraph 4.135 requires new development to "provide appropriate levels of secure, integrated, convenient and accessible cycle parking".

Active and Social Linkages

The policy topics of the Active and Social Places theme can work together to actively create sustainable and cohesive communities through development plan policies, including specific allocations, and development management decision making. In particular policies will enable sustainable access to housing, employment, shopping, education, health, community, leisure and sports facilities and green infrastructure, maximising opportunities for community development and social welfare.

This policy aims to ensure new development is located and designed in a way which minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment

3. DISTINCTIVE & NATURAL PLACES

Green infrastructure

Paragraph 6.2 defines green infrastructure as "the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places" and "at smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks".

Paragraph 6.2.5 acknowledges the role of green infrastructure in enhancing the design quality of the built environment. It goes on to state that "with careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places". It is also advised that "there are multiple ways of incorporating green infrastructure, dependent on the needs and opportunities a site presents".

Paragraph 6.4.21 establishes that "planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible".

Technical Advice Notes

Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs:

- TAN 6: Planning for Sustainable and Rural Communities (July 2010)
- TAN 2: Planning and Affordable Housing (June 2006)
- TAN 12: Design (March 2016)
- TAN 18: Transport (March 2007)
- TAN 20: Planning and the Welsh Language (October 2017)

Supplementary Planning Guidance

Supplementary Planning Guidance (SPG) provides further detail on certain policies and proposals contained within Cardiff’s Development Plan. They help ensure that certain policies and proposals are better understood and applied effectively. SPG do not have the same status or weight as adopted Development Plan policies. However, the Government advises that they may be considered as a material consideration in determining planning applications.

The following Supplementary Planning Guidance (SPG) are of most relevance to the development proposals:

- Affordable Housing SPG
- Placemaking and Design SPG
- Leisure and Open Space in new Development SPG
- Archaeology EIA SPG
- Natural Environment and Biodiversity SPG

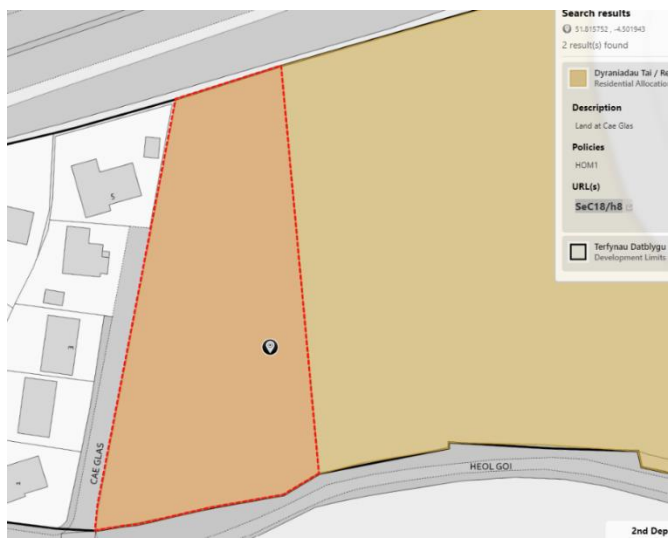
Revised Local Development Plan (2018-2033)

The draft Second Revised Local Development Plan (RLDP) was released for public consultation on February 17, 2023, with the consultation period extending until April 14, 2023. Within the framework of the draft Revised LDP, the site is provisionally re-allocated for a designated as residential development, identified by reference SeC18/h8 – Land at Cae Glas.

This proposed re-allocation aligns with the broader strategic vision outlined in the Adopted LDP and RLDP alike, emphasising the importance of effectively safeguarding the land use of this site for residential development.

To note, the implementation of the Revised LDP has been delayed due to new targets from Natural Resources Wales aiming to reduce river phosphate levels in SACs across Wales, including Afon Teifi, Afon Tywi, River Wye, and Afon Cleddau in Carmarthenshire. The LPA are in the process of reassessing the implications of these targets on the Revised LDP and development allocations in phosphate-sensitive catchments, amongst other issues arising post-target publication.

Fig. 7 Draft Allocation (RLDP Extract)



The following draft policies are most applicable to the proposed development:

Policy HOM1 – Housing Allocations

Land is allocated for residential development as per the following:

SeC18/h8	Land at Cae Glas	5	Commuted Sum Contribution	Year 11- 15
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Site numbers highlighted within the Policy HOM1 are intended to be indicative and been considered on a site by site basis. They will be subject to further consideration at application stage. Regard will also be had to the policies and provisions of this plan and other relevant design principles.

Policy AHOM1 – Provision of Affordable Homes

An on-site contribution towards affordable housing will be required on all market housing allocations and windfall sites of 10 or more homes to meet the affordable housing target set out in Policy SP5. The percentage target level for affordable housing is based on the scale of development:

- sites comprising 10 – 19 homes will be required to provide an affordable housing contribution of 10%;
- sites comprising 20 - 50 homes will be required to provide an affordable housing contribution of 12%;
- sites comprising 51 – 100 homes will be required to provide an affordable housing contribution of 20%;
- sites of 101 homes or more will be required to provide an affordable housing contribution of 25%.

The affordable housing target percentage noted is a target to be used as a starting point for affordable housing negotiations.

The Policy's requirements for on-site contributions apply to all proposed housing developments located within settlement boundaries with a capacity to deliver a net increase of 10 dwellings or more new homes. Those sites which fall outside of the settlement boundaries will be subject to the requirements of Policy AHOM2.

The mix of dwelling sizes, types and tenure required to be provided on each site will vary according to the specific needs of the locality at the time of application. This will need to take into consideration the latest information on housing need from the LHMA, alongside any relevant local information such as the Council's waiting list and any recently delivered affordable housing units within the area.

Planning History

Previous Planning Applications

The site has one previous lapsed consent for the development of 5 homes, which was permitted under Appeal 10/02/12 with planning portal reference W/21657 and Appeal Reference APP/M6825/A/11/2162699.

Analysis

Principle of Development

Under the provisions of Policy H1, the application site is allocated by the Local Development Plan (LDP) for residential development. The proposal seeks full planning permission for 12 dwelling houses on this designated site within the settlement development limits. The site has been assessed as part of the Local Development Plan, establishing the principle of development through statutory plan preparation processes.

The development also aligns with the aspirations of the draft Revised Local Development Plan (RLDP) and supports safeguarding this land for its preferred use. Regarding the increase in the number of dwellings from the original allocation to 12, the site's re-designation for residential use confirms the long-established need for housing in St Clears. The figure of five units in the LDP is notional and not intended as a maximum capacity. When assessing density, the National Development Framework (Future Wales) and Placemaking Supplementary Planning Guidance are considered.

In this case, although the proposed density is higher than the LDP figure, the site constraints have been thoroughly assessed, ensuring that the houses do not appear cramped. The proposed development has been designed with careful consideration of the existing neighbouring properties. There is no anticipated harm to current residents, as the layout has been meticulously planned to preserve existing views from Cae Glas and ensure minimal disruption. The design aims to limit the number of dwellings with rear boundaries adjacent to the existing Cae Glas private drive, thereby reducing any potential impact on current residents. Additionally, adequate provisions have been made for drainage and Biodiversity Net Gain requirements, ensuring compliance with environmental standards whilst still achieving a larger quantity of units on site.

In conclusion, the principle of development for the site at Heol Goi, St Clears, is well-established and robust. This proposal represents a suitable and strategic contribution to the housing supply in St Clears, aligning with both local and national planning policies.

Affordable Housing

Policy AH1 of the Local Development Plan along with its associated Supplementary Planning Guidance seeks a 30% contribution to affordable housing from this site. However, Policy AH1 acknowledges that this provision is contingent on the viability and deliverability of a scheme, assessed on a case-by-case basis. Where appropriate, a reduction in the quantum of affordable housing provision can be accepted to ensure the viability of the development.

This application is accompanied by a detailed Development Viability Model which outlines the reasons for seeking a reduction in the affordable housing contribution to one dwelling. The DVM rigorously evaluates the financial constraints and project-specific challenges that necessitate this adjustment.

The applicant has proactively engaged informally with the Local Planning Authority receiving informal feedback that the contribution figures in the adopted LDP are currently over-projected. The emerging Revised Local Development Plan proposes a more realistic and sustainable strategy for delivering affordable homes in this location. Policy AHOM1 of the RLDP sets a 10% target for affordable housing on sites with 10-19 dwellings. This target serves as a starting point for negotiations on affordable housing provision, reflecting up-to-date housing need and viability data.

	<p>The proposed scheme aligns with this future trajectory, although it is understood that the current adopted LDP is the primary material consideration.</p> <p>In light of the above, it is important to consider that the DVM provides comprehensive evidence that the financial viability of the project is compromised by a 30% affordable housing requirement. Reducing the contribution to one dwelling ensures the scheme remains financially feasible and deliverable. The RLDP's 10% target for affordable housing on sites of this scale reflects a more balanced and achievable approach. Adhering to this future policy direction aligns with strategic long-term objectives for sustainable development. By accepting a reduced affordable housing provision, the overall housing delivery on the site is maximised. This approach supports broader housing supply goals and contributes to meeting the community's diverse housing needs.</p> <p>Balancing the need for financial viability with the goal of delivering a sustainable and comprehensive housing scheme, the proposed reduction to one affordable dwelling is a pragmatic and necessary adjustment. Therefore, it is concluded that although the proposal deviates from the current Policy AH1, it aligns with the future trajectory outlined in the RLDP and is crucial for the successful delivery of the development. The reduced affordable housing provision ensures the project's viability, maximises housing delivery, and ultimately supports the long-term planning objectives of St Clears.</p>
<p>Transport and Movement</p>	<p>Policies SP9, TR2, TR3 and TR4 of the LDP seek to maintain highway safety standards and ensure developments are meeting sustainable credentials.</p> <p>The site is sustainably located in respect of its connectivity and proximity to public transport options. The availability of a range of access options will discourage the use of private motor vehicles and encourage the use of active travel modes for future users.</p> <p>The site lies adjacent to Heol Goi Road, with access proposed through the existing Phase 1 development to the east. The infrastructure to provide this access is already in place. The width of the access and visibility splays are designed as per Highway design specifications to ensure the safety standards for road users. Access to the development is planned to extend from the internal road running through the adjacent development to the east, incorporating a hammerhead turnaround for efficient traffic flow. The dwellings to the north and south will be served by private driveways. Public and private areas are clearly delineated.</p> <p>The new parking is located on plot at a standard of up to 2 spaces per 4 bedrooms. The scheme does not achieve the maximum parking standards of 1 space per bedroom, however, the site is suitably located within a Strategic Service Centre to encourage more active forms of travel due to its optimal location. A reduced level of parking is acceptable on this occasion, mirroring that what was accepted on the adjacent Phase 1 consent.</p> <p>The site is well served by an established network of pedestrian infrastructure serving the existing town of St Clears. The facilities of St Clears are accessible by foot within the town within walking distance. The routes to key facilities are mainly flat and all streets surrounding the site have at least a footway on one side of the carriageway which provide suitable access to local facilities.</p>

There are a number of Public Rights of Way in close proximity to the site. Routes are accessible from High Street and Heol Goi. The one route provides access to Pwll Trap neighbourhood of St Clears. 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 area of the site are suitable for cycling and thereby provide an opportunity for trips to be made to and from the site by bicycle.

The nearest bus stops to site are located on High Street (Co-op Bus Stops). The stops are served by bus services 221, 222, 223, 224 and 322. These services provide access to Tanerdy, Pendine, Haverfordwest and Carmarthen.

Fig.7 Proximity to Key Services

Facility / Amenity	Walking / Cycling Distance from site access (metres)	Walking Travel Time (minutes)	Cycling Travel Time (minutes)
Co-op Bus Stops	97	1	<1
St Mary Magdelene's Bus Stops	322	4	1
St Mary Magdelene Church	322	4	1
Market Hall Vets	322	4	1
Subway	322	4	1
Santa Clara Bus Stops	483	6	2
Cuddle Up Cookies	483	6	2
SPAR	483	6	2
Coach & Horses Surgery	483	6	2
County Stores Bakery	483	6	2
Elaichi Indian	483	6	2
Neil's Fish & Chips	483	6	2
Garage Bus Stops	645	8	2
The Original Factory Shop	645	8	2
Butchers	645	8	2
Ty Bara	645	8	2
Corvus Inn	805	11	3
Starbucks	965	12	3
Ysgol Griffith Jones	1609	20	5
Co-op Food	1609	20	5
The White Lion Inn	1609	20	5

The nearest station to the site is Whitland Station, located approximately 8km to the west of the site. The station is approximately a 30-minute cycle or 10-minute drive. Whitland station is located on the West Wales line from Swansea. A branch line diverges towards Pembroke and the main line continues to Milford Haven and Fishguard Harbour. Trains connecting to Swansea are an hourly service and take approximately 1 hour 10 minutes.

In regards to traffic generation, it is not anticipated that the number of dwellings proposed would give rise to any harm on the existing operations of the highway in the local area. The site represents a planned extension to the existing estate to the east and does not compromise on highway safety to achieve its design. Furthermore, the previous Phase 1 consent to the east consisted of conditions imposed in the form of active travel improvements, which have been implemented and will also benefit this site.

For these reasons, the design of the proposals maximises active travel principles and ensures appropriate and safe highway access. Furthermore, the proposed development does not give rise to any cumulative impact to the vehicular traffic on the roads serving the development. In

	<p>summary, the development is in line with Policies SP9 and TR2/3/4 of the Carmarthenshire Local Development Plan, and meets the appropriate standards outlined within TAN18.</p>
<p>Trees</p>	<p>Policy EQ5 of the Carmarthenshire Local Development Plan states that woodlands, trees and hedgerows are an integral and ever-changing part of the landscape and townscape character of the County. It is important that all trees are retained, protected and wherever possible, added to.</p> <p>A suitable Tree Survey, Tree Protection Plan and AIA has been prepared for the site. Two category B trees were recorded at the northern most boundary. No trees are recommended for removal to may way for development of the site. The following mitigation and enhancement measures are proposed to protect boundary trees from construction damage:</p> <ul style="list-style-type: none"> • A construction exclusion zone to be maintained, with tree protective barrier fencing segregating retained trees from the rest of site, physical damage to trees can be avoided. • Tree protective barrier fencing must be installed in the configuration outlined in the Tree Protection Plan • The crowns of all trees will be enclosed within the tree protective fencing. • Machine operators will be briefed on positioning their equipment to avoid contact with branches from retained trees and the root protection zones. • Where access is required beneath the crown or canopy area of retained trees, all pruning work to facilitate access will be carried out prior to the development stage, height restriction barriers are to be installed at the edge of areas of caution where entry beneath barriers occurs, and banksmen are to be assigned to make sure no contact with branches is made during the movement or use of plant. <p>Given the basis that no trees are lost and a robust set of protective measures are proposed it is concluded that the development accords with the principles of Policy EQ5, Policy SP14 and the Carmarthenshire County Council Local Development Plan.</p>
<p>Ecology</p>	<p>The LDP seeks to protect important features of biodiversity and ecology through Policies SP1,SP2 and EQ4. A suitable ecology survey has been undertaken for the site and a Green Infrastructure Statement is also provided in line with PPW Chapter 6 requirements of the step-wise approach to protect, mitigate and compensate harm to GI value of each particular site.</p> <p>site comprises of improved grassland, marshy and poor semi-improved grassland. There are hedges alongside the site, along with trees at the northern boundaries. No invasive non-native plant species are present.</p> <p>No evidence of badger setts, latrines, or foraging was found on the site, indicating that the development is unlikely to impact badgers. The habitat is also unsuitable for otters and water voles. The site is furthermore generally unsuitable for reptiles and amphibians, negating the need for further surveys.</p> <p>The roadside hedge is low level, regularly trimmed, and poorly connected to the wider landscape, making it unsuitable for hazel dormice, and no evidence of this species was found. While hedgehogs have been recorded within 500 meters of the site and anecdotal reports suggest their</p>

presence in nearby gardens, the site itself is not currently suitable for hedgehogs. However, the development may create more suitable habitats, including gardens, in the future.

The grassland is of minimal value to nesting birds, and no birds of conservation concern are likely to nest. Although the hedges and scrub fringes offer some potential nesting habitats, they are unlikely to support species of significant conservation concern, as none were observed.

No bat survey was conducted due to the lack of roosting potential on site. The hedgerow trees are not mature enough to develop significant roost features, and there are no buildings. The field is unlikely to be significant for foraging bats, but the hedges may serve as commuting corridors.

The following recommendations will be followed to enhance/retain the ecological value of the site:

- Soft landscaping proposals avoid using any invasive or potentially invasive species
- A lighting plan will be produced prior to commencement and a dark corridor maintained along the northern hedgerow boundary.
- New habitats will be created through planting small areas of native tree and shrub species within the site and, over time, gardens will develop.
- Native tree and shrub planting will be carried out along the southern boundary of the site to provide new woodland habitat, improved wildlife linkages and enhance / protect the existing boundary hedge.
- Pollinator-friendly plants to be included in the landscape planting for insects and bee bricks will be included on each property, built into a sheltered south or west facing wall.
- Hedgehog gateways will be included in all fences between gardens
- Integrated bat boxes will be included on houses
- Bird nesting features will be provided on each property
- The proposed attenuation basin is designed with wildlife in mind.

It is therefore concluded that the proposed development does not present a significant risk to habitats on or adjoining the site, and no priority habitats or protected species are affected. The development would also bring opportunity for biodiversity net gain and improve the overall environmental quality of the site as demonstrated within the appended Green Infrastructure Statement. Therefore, the proposed development remains in accordance with Policies SP13, GP1, EQ4 and other associated Policies, as well as PPW sections 6-6.5.

Drainage

A suitable Drainage Strategy has been prepared for the scheme and will be subject to approval from SAB. To address water management and prevent flooding, an attenuation basin is proposed at the northern end of the site. A clear, unobstructed route for surface water drainage will span from the south to the north, ensuring effective management of runoff. Multiple SUD's features are proposed across the development including soft landscaped basins and bio retention features, as well as permeable paving. Upgrades are also planned to LPA adopted control units.

Surface water runoff will be collected within a positive system and discharged into an existing Local Authority adopted surface water network, developed as part of the adjacent residential development. Flows are to be restricted on site in accordance to greenfield runoff rate resulting in an appropriate final discharge rate.

A S185 agreement will be entered into to divert the existing combined sewer. A gravity foul system is proposed for the development site discharging into the adjacent DCWW adoptable foul network located within the adjacent development.

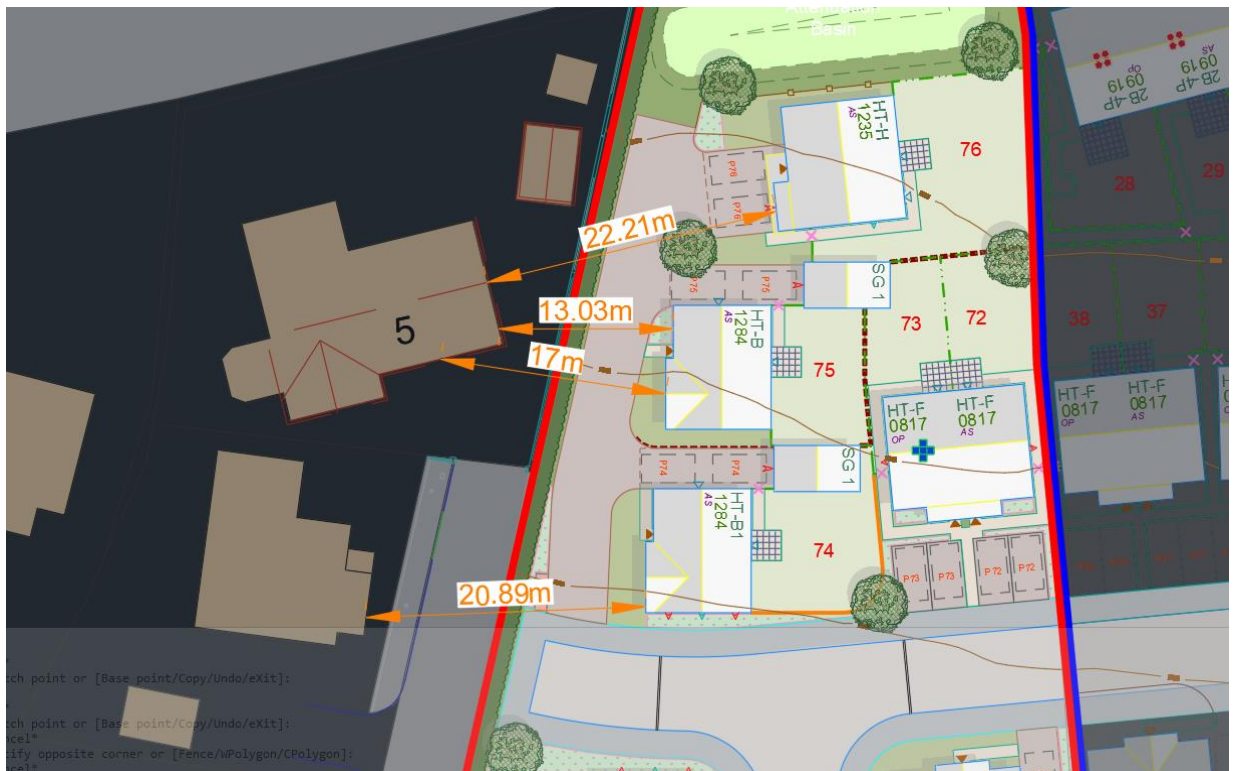
It is therefore considered that the criteria on Policy EP3 in regards to drainage of the site has been met.

Amenity

The layout of the scheme has been designed with careful regard to Carmarthenshire County Council Local Development Plan and guidance (Policies SP1 and GP1) and ensures that satisfactory levels of amenity are met on site, and that amenity standards are maintained for existing occupiers of adjacent dwellings.

Careful consideration of the existing dwellings', the current views from Cae Glas has been vital to the schemes design to ensure these are preserved, ensuring minimal disruption. To minimise the impact, the layout aimed to limit the number of dwellings with rear boundaries adjacent to the existing Cae Glas private drive. Where the 21m distance is not achieved, the outlook strictly avoids any habitable rooms.

Fig.8 Amenity Distances



Where a proposed dwelling has its rear boundary facing onto Cae Glas a strong landscape buffer has been incorporated along the rear boundaries of these dwellings. This green space enhances visual appeal, maintains amenity standards and provides privacy. This measure also softens the transition between built and natural areas.

	<p>Suitable boundary treatments are proposed, and public/private roads are clearly distinct as depicted within the appended boundary treatments plan and external works plan.</p> <p>The landscape proposals for the site ensure that the resultant proposal is attractive as well as functional, ensuring that green/blue infrastructure are intertwined within the built form.</p> <p>It is therefore concluded that good design principles are met in regard to levels of residential amenity, in line with aspirations of the Carmarthenshire County Council LDP.</p>
Archaeology and Heritage	<p>Policy SP13 of the LDP states that development proposals should preserve or enhance the built and historic environment of the County, its cultural, townscape and landscape assets and where appropriate, their setting. In this case, the development site is located within 500m of a designated ancient monument and in close proximity to listed structures as such, due regard has been given to their setting.</p> <p>A Setting Impact Assessment has been conducted on the proposals. An impact assessment was carried out previously in 2021 to assess the implications of the Phase 1 of this development immediately to the east. The report both updates that assessment and provides additional information relating to the current development. This assessment is primarily concerned with scheduled monument CM322 Eithin Bach Round Barrow, as originally identified by CADW in their response to pre-application consultation.</p> <p>Scheduled monuments CM290 St Clears Priory (320 meters southeast) and CM095 St Clears Mound and Bailey Castle (490 meters southeast) are unaffected by the development. Additionally, 16 listed buildings within 500 meters of the site show no identified impact.</p> <p>The site lies on the edge of the Taf and Tywi Estuary Landscape of Outstanding Historic Interest and the St Clears Conservation Area, but no assessment has been undertaken within the report as potential impacts are negligible.</p> <p>Notably, the CM322 Eithin Bach Round Barrow, dating to the Bronze Age, is a 16.5-meter diameter and 1.2 to 1.3-meter high prehistoric burial mound. Scheduled for its archaeological significance, it remains largely intact and lies 60 meters southwest of the proposed development area. During the site visit, it was concluded that the siting of the Eithin Bach Round Barrow on a local high point with gentle north-facing slopes suggests intentional placement for views to the north and, to some extent, the west and east. However, no specific contemporary focal points were found in the surrounding landscape, and no significant points of inter-visibility were established.</p> <p>The monument's general views include higher points in the landscape, with greater prominence to the north and northwest. Modern development to the north has likely impacted its original visual setting by obstructing views, and ongoing development to the northeast will further reduce visibility in that direction.</p> <p>The proposals will introduce modern residential development into a former pasture field. Existing development lies to the west, and similar ongoing development is to the east. There will be no physical impact on the designated monuments.</p>

	<p>The primary impact of the proposed development will be visual, affecting views from CM322 Eithin Bach Round Barrow. Complete mitigation would necessitate removing a substantial portion of the development area, which is not feasible given the project's viability. To address this, vegetation has been introduced along parts of the boundary to soften the visual impact. Additionally, the site is considered a suitable development, blending with the existing built environment the context of neighbouring land uses.</p> <p>There is also a potential impact on associated archaeological remains, though this is considered low based on assessments and surveys. Mitigation involves either an intrusive archaeological evaluation prior to development or maintaining an archaeological watching brief during construction. This would be adhered to if sought via pre-commencement planning conditions to ensure no harm to any assets.</p> <p>It is therefore concluded that suitable assessment and mitigation has been proposed to ensure that features of historic and archaeological importance near the site are protected during the delivery of this development, aligning with Policy SP13 of the Local Development Plan.</p>
Noise	<p>Policy EN2 of the Local Development Plan states that new developments must ensure that noise pollution is minimised.</p> <p>Noise does not form a constraint to the development of the site, it is therefore contended that the site will have no adverse impacts in terms of noise pollution, compliant with Policy EN2 of the adopted LDP.</p>
Air Quality	<p>Policy EP2 determines that wherever possible, proposals should seek to minimise the impacts of pollution. New developments will be required to demonstrate that they do not conflict with National Air Quality Strategy objectives, or adversely affect to a significant extent, designated Air Quality Management Areas.</p> <p>The development of this site does not conflict with Policy EP2, and pollution generation will be strictly managed through appropriate planning conditions compliant with the criteria of Policy EP2.</p>
Coal Mining	<p>The site is not located within an area that would be affected by past, present, or future underground mining activities.</p> <p>The development proposals therefore have no conflicts with Policy MPP3, or any other associated mineral safeguarding policies.</p>
Conclusions	
	<p>The principle of development of the site has been evidenced to be in compliance with key development plan policies and aligns with the aspirations of Carmarthenshire County Council in safeguarding this site for its intended and allocated use.</p> <p>With regard to considerations of transport and movement, the Site is in a highly sustainable location with a wide range of services and facilities in the locality. The development would</p>

maximise opportunities for sustainable travel through the provision of new homes within a strategic location. The proposal also delivers an environmentally conscious development.

The development would comply with other technical policy requirements, including in respect of trees, ecology, archaeology, flood risk, drainage, design, noise, and air quality.

It is therefore concluded that the proposed development would be in compliance with the development plan and consequently should be supported.