

Planning Statement

Land at Heol Llest y Bryn
Camarthen

August 2024

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planning consultants



Introduction

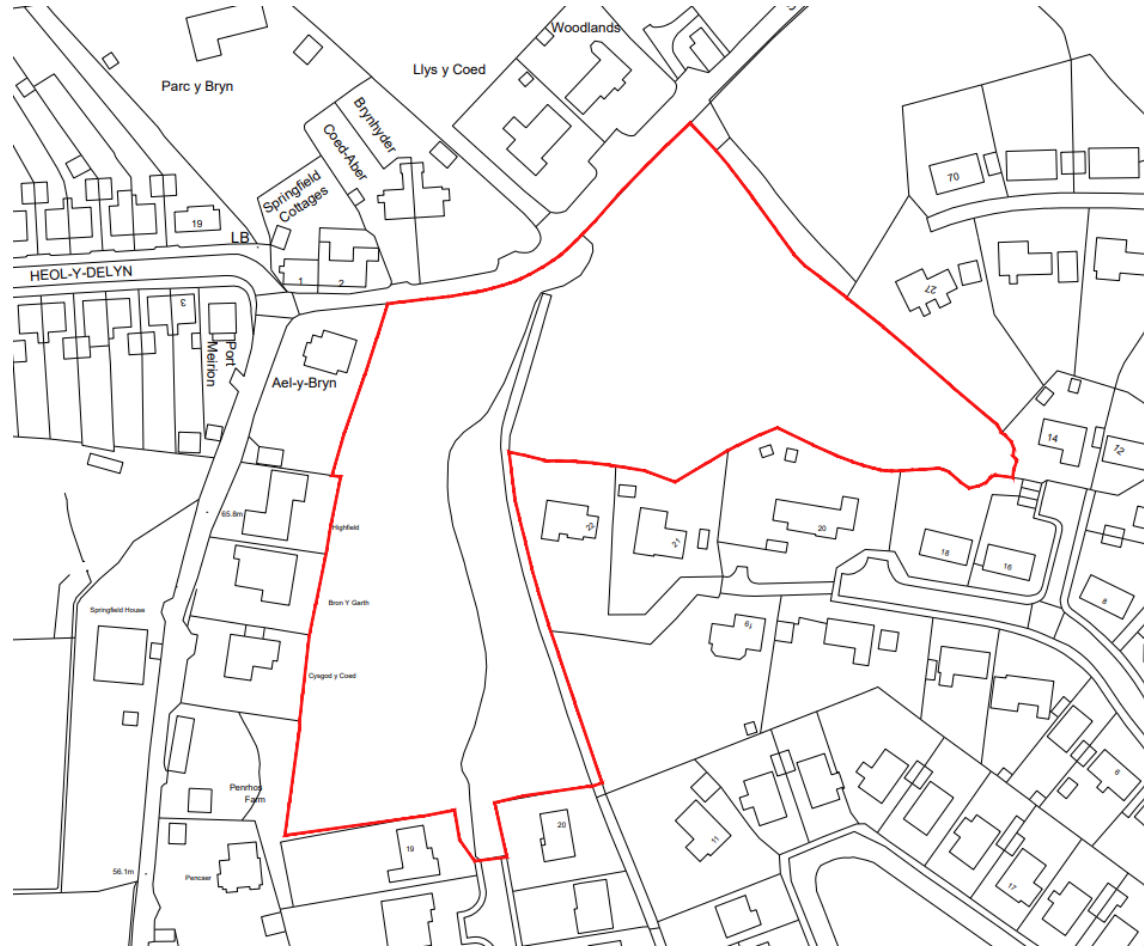
Client This statement has been prepared on behalf of Obsidian Homes Ltd.

Scope This statement accompanies a full planning application for residential development, landscaping, drainage and associated works at Land at Heol Lluest y Bryn, Camarthen.

Site Details

Site Location

Fig.1 Site Location Plan



Site Description

The site at Heol Lluest y Bryn is located approximately a mile from the town centre to the north of Camarthen, within the Conservation Area.

The proposed site comprises two fields on the north-eastern side of Carmarthen, sloping gently with a south-west to north. The site comprises of poor semi-improved grassland with extensive areas of recently cleared bracken and bramble scrub. site is bounded by hedgerows and trees border the site at the north, east and west boundaries.

The site is surrounded by existing residential development on all sides. The site can be accessed from the south off Lluest Y Bryn a residential street of large detached properties. A Public Right of Way (PROW) runs north south through the site between Lluest Y Bryn and Springfield Road.

A multitude of facilities are accessible on foot or by bike from the site including schools, GP surgery, hospital, various shops, amenity spaces and leisure facilities. The nearest bus stop is located within a 5-minute walking distance from the site which is frequent. Further onward travel is also possible from the connections of this service. The local train station is also sustainably located and accessible from the site.

Development Proposals

The Scheme

The development of land at Heol Lluest y Bryn St Clears, presents an exceptional opportunity to provide new high-quality homes within easy walking distance of the town centre, schools, community services, and leisure facilities.

In terms of illustrative mix, the development seeks to provide 33 units with a mix of 2,3- and 4-bedroom houses, inclusive of a 12% affordable housing provision. A comprehensive analysis of the site and its context has been conducted, leading to the thoughtful conclusion that there is ample capacity to accommodate 33 housing units without compromising high-quality design standards or the amenity of neighbouring properties.

The proposed material palette and housing pattern will take cues from the local character and the adjoining Conservation Area. Similar to surrounding development, homes and driveways will be set back and residential parking will be provided in a non dominant manner. For ingress and egress, a singular point of direct vehicular access is proposed from Lluest Y Bryn Road, serving as the development's main entrance.

Attention has been given to creating ease of pedestrian movement, taking into account any abrupt level changes to facilitate accessibility for all users. The existing PROW is sought to be relocated and reintegrated into the highway network. The applicant is also currently in discussions with the Countryside and Access Officer regarding diverting and extinguishing sections of Public Right of Way crossing the site. The relocated access is depicted to the northern boundary of the Site Layout. From initial discussions, it has been concluded that the proposed reroute would be straightforward subject to agreement regarding materials/gradient and the new route would be substantially as convenient as the original, if not a betterment.

Vehicular access to the site is proposed from the south, which would form a natural extension off Heol LLuest y Bryn Road. This adjoining road is of a good highway standard and affords appropriate visibility for oncoming vehicles, as well as safe and well-lit footways for pedestrian connectivity to the wider area of Carmarthen. Condition 17 of the previous planning consent prohibited vehicular access to the site from Springfield Road and therefore this option has not been explored through the design evolution. Car parking is provided to a compliant standard of 71no. bays, along with 17no. garage parking availability.

There are a small number of existing trees on the site perimeters, which together with mature hedgerows will be retained wherever possible for landscape benefit, and to allow for a sense of ecological connectivity. Boundary vegetation will be fully retained where possible. The drainage solution for the scheme would be through the introduction of a SuD's basin at the southwestern corner of the site, where the gradient of topography naturally slopes, allowing gravity to facilitate the drainage system.

The landscaping of site boundaries will be enhanced, retaining the existing woodland and trees along the perimeters. Additionally, addition of new green infrastructure and landscaping will be implemented within the site to further elevate the site's ecological value. The site has been identified as a potential reptile habitat, and as such, suitable translocation measures will be undertaken. A site search for a suitable translocation area has already commenced, with further targeted surveys underway.

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

Fig.2 Site Layout



The resulting indicative layout accommodates consistent standards for the size and amenities of homes, ensures privacy and provides a legible and suitable development to compliment the existing settlement. The character of the scheme is intended to reflect Carmarthen's existing surroundings. This is achieved through the use of changes in typology and building line, landscaping and materials. This results in a scheme that is appropriate for the site and Carmarthen as a whole.

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.

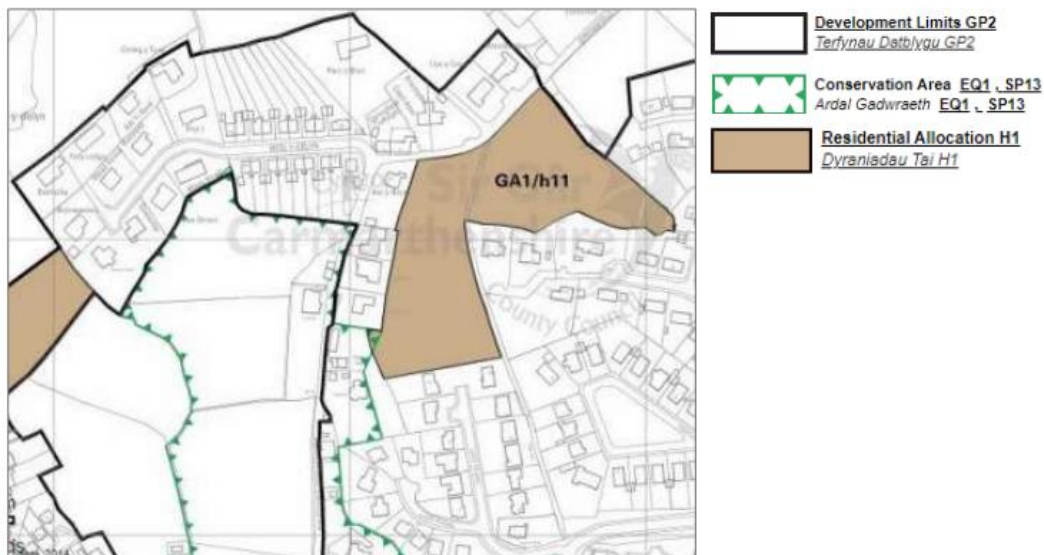
Adopted Local Development Plan (2006-2021)

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 (GA1/h11)
- Adjacent to Carmarthen Town Centre Conservation Area (Policy EQ1/SP13)
- Designated as located within Camarthen “Growth Area” 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:

- a) Distributing development to sustainable locations in accordance with the settlement framework, supporting the roles and functions of the identified settlements;
- b) Promoting, where appropriate, the efficient use of land including previously developed sites;
- c) Integrating with the local community, taking account of character and amenity as well as cultural and linguistic considerations;
- d) Respecting, reflecting and, wherever possible, enhancing local character and distinctiveness;
- e) Creating safe, attractive and accessible environments which contribute to people's health and wellbeing and adhere to urban design best practice;
- f) Promoting active transport infrastructure and safe and convenient sustainable access particularly through walking and cycling;
- g) Utilising sustainable construction methods where feasible;
- h) Improving social and economic wellbeing;
- i) 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.

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 (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 4.1.35 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

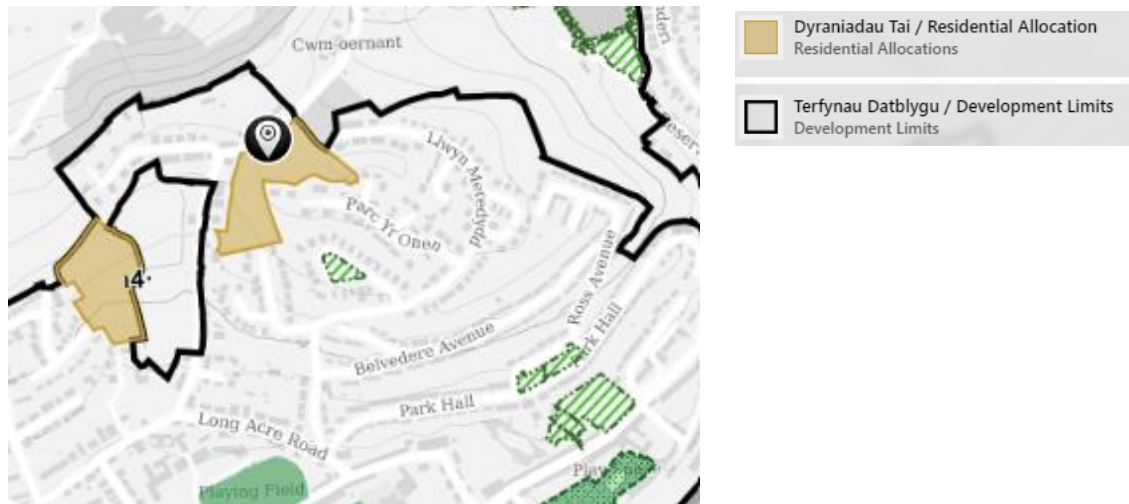
Green infrastructure

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”.

	<p>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”.</p>
<p>Technical Advice Notes</p>	<p>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:</p> <ul style="list-style-type: none"> • 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)
<p>Supplementary Planning Guidance</p>	<p>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.</p> <p>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.</p> <p>The following Supplementary Planning Guidance (SPG) are of most relevance to the development proposals:</p> <ul style="list-style-type: none"> • Affordable Housing SPG • Placemaking and Design SPG • Leisure and Open Space in new Development SPG • Archaeology EIA SPG • Natural Environment and Biodiversity SPG
<p>Revised Local Development Plan (2018-2033)</p>	<p>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.</p> <p>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.</p> <p>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.</p>

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:

PrC1/h2	Springfield Road	29	8.7
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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

	<p>more new homes. Those sites which fall outside of the settlement boundaries will be subject to the requirements of Policy AHOM2.</p> <p>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.</p>
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Planning History

<p>Previous Planning Applications</p>	<p>Outline Planning Permission (reference W/35903) for a residential development with all matters reserved was granted on 13 May 2019 subject to a series of conditions and a S106 that secured the provision of 30% affordable housing, financial contributions towards education and reptile trapping, relocation and management of a receptor site.</p> <p>The Outline Planning Permission included an indicative layout for 29 dwellings with a mix of two storey dwellings and bungalows, accessed off an internal access road extended from the existing turning head at Llust y Bryn. The standard time limit condition was imposed requiring the submission of all reserved matters within 3 years of the date of the planning permission i.e. 13 May 2022. However no reserved matters submission(s) have been received. The overall 5 year time limit expired on 13 May 2024.</p>
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Analysis

<p>Principle of Development</p>	<p>The proposal seeks full planning permission for 33 dwelling houses. The site is located within the established residential area of north Carmarthen Town and is allocated for residential development within the LDP, and has been the subject of previous permission for its development for residential purposes. It is therefore well established that development of the site for residential purposes is acceptable in principle, as also advised through pre-application consultation with Carmarthenshire County Council.</p> <p>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 33, the site's re-designation for residential use confirms the long-established need for housing in Carmarthen. The figure of 29 in the LDP is notional and not intended as a maximum capacity and has also been derived from previous consents of which constraints have been thoroughly assessed through the design of this scheme. When assessing density, the National Development Framework (Future Wales) and Placemaking Supplementary Planning Guidance are considered.</p> <p>In this case, although the proposed density is higher than the LDP figure, the site is fully capable of accommodating 33 homes without compromise to design, amenity or biodiversity standards. The proposed development has been designed with careful consideration of the existing neighbouring properties.</p>
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	<p>In conclusion, the principle of development for the site at Heol Lluest y Bryn is well-established and robust. This proposal represents a suitable and strategic contribution to the housing supply in Carmarthen, aligning with both local and national planning policies.</p>
Affordable Housing	<p>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.</p> <p>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.</p> <p>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 12% target for affordable housing on sites with 20-50 dwellings. This target serves as a starting point for negotiations on affordable housing provision reflecting up to date need and viability data.</p> <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 12% 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.</p> <p>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 Carmarthen.</p>

Transport and Movement

Policies SP9, TR2, TR3 and TR4 of the LDP seek to maintain highway safety standards and ensure developments are meeting sustainable credentials.

A comprehensive Transport Statement accompanies this planning application. The site benefits from a lapsed outline planning permission for residential development (W/35903). There is a future walking route (Ref: C85 within the Transport Statement) shown on the Council's ATNM that crosses the development site. This follows the line of an existing public footpath (Ref:61/18/1). The development proposal pays regard to this and enables the delivery of this walking route through the site, albeit with a slight diversion of the line of the path.

Due to the recent previous site permissions, along with the site's strategic allocation within the LDP, it has already been established that the site is suitable in location for development of new housing. There are a surplus of amenities and facilities within the local area, meaning that residents will not need to rely on vehicles to get around and meet their daily needs. This in turn reduces road congestion.

The site will be accessed by extending Llust y Bryn, a residential cul-de-sac that currently serves approximately 20 homes. The street comprises of a 5.5m wide carriageway with 2m wide footways on both sides.

The site is accessible to pedestrians from Llust y Bryn, a residential street that has good quality, lit, footways along both sides. There is also a public right of way crossing the Site. The PROW runs along the site's boundary, to the west of Parc yr Onen and then across open land to link with Springfield Road. There is a kissing gate and 5 steps at the footpath's junction with Springfield Road. The stepped access points at each end of the PROW and its unsurfaced condition make this pedestrian route difficult to negotiate for people with movement difficulties. The PROW link will be retained as part of the development and improved so that it can be utilised by more people, including those with movement difficulties or visual impairment.

The nearest bus stop to the site is located on Belvedere Avenue, some 250m to the south. It provides access to the services described in the following table. Journeys by bus to Carmarthen's Blue Street bus station take around 7 minutes. From Blue Street, multiple connecting public transport services can be accessed. These include the rail services from the railway station, which is located a 5 minute walk from Blue Street.

The new length of Llust y Bryn within the development site will be to an adoptable standard, providing a 5.5m wide carriageway with adjacent 2m footways. Road narrowings are proposed at the entrance to the development and approximately mid way along the length of the extended street to add interest and act as speed reducing features. Turning areas are provided at the end of the street to allow for refuse vehicles to service the site. The final 5 properties within the development will be served by a private, shared driveway.

The line of the PROW will be diverted where it passes through the development site. On entering the site at its south eastern corner the PROW's route will be diverted to link with the new estate road and pedestrians will walk along the footway that runs along the street. This increases the natural surveillance of the route. An uncontrolled crossing point, consisting of dropped kerbs and tactile paving, will be located between plots 25 and 26 that will link to a footpath that runs

between these properties and connects with Springfield Road. A level, ramped connection to Springfield Road will be provided, replacing the existing steps that prevent access to the PROW for some. As part of the development it is proposed that the section of PROW that runs along the site's boundary with Parc yr Onen be permanently stopped-up. It is recognised that the diversion and stopping-up of the sections of the existing PROW will be subject to the necessary Diversion and Stopping-up Orders.

The Parking Standards suggest that provision should be made for 1 visitor parking space for each 5 dwellings. This equates to 6 or 7 visitor spaces in this case. It is considered that visitor parking can be accommodated safely and without causing obstruction on an informal basis at the kerbside. No dedicated visitor parking spaces are provided. This informal on-street parking for visitors is considered preferable to the provision of dedicated visitor spaces because of the flexibility it provides. Experience has shown that visitors will often ignore dedicated visitor parking spaces to park on street as near as possible to the property they're visiting. Dedicated visitor parking spaces can also be problematic in that there is a tendency for the property nearest the space to adopt it as its own, making it unavailable to visitors

TRICS data suggests that the proposed development will generate 16 or 17 peak hour vehicle movements. This equates to, on average, one additional movement every 3 to 4 minutes or so during the busiest times. The volume of traffic generation is not considered to be significant and will have no material impact on the operation of the highway network.

Overall, the Transport Statement concludes that the site is well-situated for sustainable transport, with safe access and minimal traffic impact, meeting all relevant planning policies. There are no transport-related concerns that should hinder the granting of planning permission

Trees

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.

A suitable Tree Survey, Tree Protection Plan and AIA has been prepared for the site.

The proposals have retained all Category A (T29 (Beech) and T25, T28, T33, T48 (Common Oak) and all Category B trees, which are T4 (Hornbeam), T10, T20 (Sycamore) and T24, T27, T32, T35, T36 (Common Oak) and T37 (Holly). All Category C individual trees are retained, which are T19, T21 (Laburnum), T20 (Sycamore), T22 (Smooth Arizona Cypress), T26 (Beech). The 3 trees identified as Category U will be removed, which are T12, T34 (Ash), T31 (Common Oak).

Where removal is unavoidable then replacement planting would mitigate their loss based on the ratio in PPW12.

Given the basis that no trees of value are lost and protective measures are to be undertaken during the construction phases of the development, it is concluded that the development accords with the principles of Policy EQ5, Policy SP14 and the Carmarthenshire County Council Local Development Plan.

Ecology

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.

The site comprises of poor semi-improved grassland with extensive areas of recently cleared bracken and bramble scrub. There are hedges alongside the site, along with trees at the boundaries. There are no watercourses adjoining or on the site.

Although significant areas of the site have become less suitable for reptiles due to scrub growth during recent years, both fields have retained a core of grassland, which will have become more suitable for reptiles in the absence of regular mowing management. Further survey work will establish the current population sizes of reptiles. The mitigation strategy comprises suitable reptile translocation.

The trees at the boundaries were inspected for potential for bats, one tree was classed as having moderate potential due to the presence of several cracks and small cavities on the dead or dying trunks.

No badger setts, latrines or signs of foraging were found on the site, therefore the development will not affect badgers. The grassland was also recorded as being minimal in value of bird habitat, however hedges on site do provide suitable habitat for nesting.

Due to lack of watercourse, the site does not have potential for otters or water voles.

The native hedgerows do offer some habitat for hazel dormouse, however the location of the site within an urban area likely minimises the likelihood of their presence due to significant disturbance. Works do not impact the northern boundary significantly and follow up survey work is not required.

Several invasive non-native species are present in small quantity, as well as three other potentially invasive non-native species were recorded.

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

Reptiles

The provision of an enhanced external compensatory site to receive reptiles translocated prior to site development is planned. The measure avoids further restricting three fairly isolated reptile populations, and allows the applicant to maximise the development potential of the site.

Birds/Dormouse

Works to hedgerows or any other movement or trimming of woody vegetation will be carried out outside the main bird breeding season (start of March to end of August).

	<p><u>Invasive Species</u></p> <p>The presence of invasive non-native plant species (INNS) on the site may mean that a management plan / Biosecurity Risk Assessment will be required. Landscaping associated with the development avoids introducing further invasive or potentially-invasive nonnative species to the site.</p> <p>The proposed development does not present a significant risk to habitats in the area. Reptile populations will be translocation to a nearby site under enhanced management. No other protected species are likely to be affected. Invasive non-native plant species will be adequately controlled and appropriate conditions will be implemented to ensure no harmful light spill occurrence. Furthermore, no trees with habitat potential are planned for removal.</p> <p>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.</p>
Drainage	<p>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 southern end of the site. Surface water is to be collected and treated through a variety of SuD's features including planting raingardens, porous surfaces and through the basin.</p> <p>The re-use of water is planned through the surface water runoff of downpipes to be collected within raingardens, with water being reused through hydration of planting. On site infiltration testing has indicated that a suitable rate can be achieved. Given the level changes on the site, in the event of a blockage, exceedance flows will be directed south.</p> <p>The proposed raingardens form a significant part of the landscaping proposal, and will be planted with suitable species complimenting the surrounding environment, attracting nectar feeding insects and providing coverage for native species.</p> <p>The conveyance pipework is to be offered up for adoption, and the basin to be adopted by SAB. In regards to foul drainage, it is proposed that the new development connects to the existing foul drainage network at LLuest y Bryn Road. This will be dealt with through appropriate section agreements.</p> <p>It is therefore considered that the criteria on Policy EP3 in regards to drainage of the site has been met.</p>
Amenity	<p>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.</p>

The development proposes an appropriate density of 33 units on a site of 1.55 (ha) as per para. 6.2.13 of Policy H1 which advises that development densities have been calculated based upon an initial standard of 30 per ha within the growth areas. The proposed site layout aims to achieve a sustainable development bordered largely by existing built structures, while respecting the scale parameters of the surrounding streets. The resulting indicative layout accommodates consistent standards for the size and amenities of each plot, ensuring a satisfactory level of privacy and preventing any undue impact on neighbouring residents and new occupants within the development avoiding any overbearing impact.

Careful attention has been given to integrating the design with the surroundings of adjacent residential properties at Llest-y-Bryn and Springfield Road. To achieve this, the elongated layout of Llest-y-Bryn, spanning varying ground levels, will be replicated. The site's enclosure will feature a centrally positioned thoroughfare, with detached and semi-detached dwelling houses oriented to front the carriageway on both sides.

The submitted site layout provides details of a range of house types across the site, including a mix of detached and semi-detached two, three and four bedroom houses. Appropriate amenity standards are met relating to dwellinghouses and habitable distances not just to adjoining residential properties, but the interrelationship between new properties within the site itself. This will ensure that no overlooking impact arises for existing residents, and complements interchangeable ground levels. The proposed development will appear as very much a continuation of the current built form.

The resulting indicative layout accommodates consistent standards for the size and amenities of homes, ensures privacy and provides a legible and suitable development to compliment the existing settlement. Furthermore, the development provides appropriate connectivity and permeability to allow easy pedestrian access to and from the site and surrounding facilities, as well as biodiversity and landscape enhancements.

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.

Archaeology and Heritage

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 adjacent to the designated Conservation Area and within close proximity to 3no. listed buildings and as such, due regard has been given to their setting.

The proposed development would adjoin the Carmarthenshire Town Centre Conservation Area from the southwest corner of the boundary of the development site.

Policy EQ1 "Protection of Buildings, Landscapes and Features of Historic Importance" seeks control development affecting landscapes, townscapes buildings and sites or features of historic or archaeological interest which by virtue of their historic importance, character or significance. The LDP does not provide specific policies regarding Conservation Areas, however, the "Conservation Area Character Appraisal and Management Plan" advises that:

- Development within the conservation area's setting should be carefully assessed to understand the impact of the proposals on the significance of the conservation area.
- The council will pay special attention to the desirability of preserving and enhancing the conservation area and there will be a presumption against development which is considered harmful.
- New development within the conservation area or its setting should not obscure or detract from important views within, towards or from the conservation area.
- Proposals which have the potential to affect and fall within the important views which contribute to the significance of the conservation area, and the heritage assets within it, should be assessed carefully.
- Verified computer generated views showing the potential impacts of proposals may be required to demonstrate the effect on the character and appearance of the area or its setting”.

A comprehensive HEDBA has been provided with this application, which assesses the site in respect of historic assets to fully understand the impact of the proposals upon the local area.

The proposed development comprises a continuation of modern residential development to the east of the Conservation Area. Modern residential developments to the east of the Conservation Area have been constructed since the 1970s and provide the setting of the surrounding area. The proposed development will only be marginally visible from the northern edge of the Conservation Area, i.e., the northern edge of Springfield Road. The Site is located outside of the Conservation Area and well-removed from its core.

While there are limited glimpses to the Site from the Conservation Area and some glimpses into the Conservation Area from the Site such views make no contribution to the significance of the Conservation Area as part of its setting. These views predominantly comprise views onto Springfield Road and there are no ranging views into the Conservation Area. Also, views to and from the Site and the Conservation Area are filtered by mature trees, vegetation, and the built form along Springfield Road. This limited intervisibility would not impact upon the key aspects of the Conservation Area’s character and appearance, or significance, as outlined above (namely, its planform, scale, and form of development).

The proposed development would change the character of the Site, but it would be seen as an extension to the residential development around Heol Lluest-Yr-Bryn. In this context, therefore, the proposed development would not harm the significance of the North Carmarthen Conservation Area; its significance would be preserved. This creates a strong policy presumption in favour of the scheme. The HEDBA further concludes that no designated historic assets would therefore be physically affected by the proposed development. This assessment, undertaken in full accordance with the guidance provided by CADW has concluded that proposals would result in no harm to the significance of any historic assets due to a change to setting. Nor would the proposals diminish the ability to appreciate the significance of any nearby historic assets.

	<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, along with the Listed Buildings and Conservation Areas Act and Historic Environment (Wales) Act 2016.</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 maximise opportunities for sustainable travel through the provision of new homes within a strategic location. The proposal also delivers an environmentally conscious development.</p> <p>The development would comply with other technical policy requirements, including in respect of trees, ecology, heritage, flood risk, drainage, design, noise, and air quality.</p> <p>It is therefore concluded that the proposed development would be in compliance with the development plan and consequently should be supported.</p>