

Carmarthenshire LDP –  
Revised 2018-2033  
Second Deposit Revised  
LDP Submission

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**Land at Station Road,  
St Clears,  
Carmarthenshire**

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April 2023



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# 1 Introduction

- 1.1 This Candidate Site submission document for the Second Deposit Revised Local Development Plan for Carmarthenshire has been prepared in order to accompany the candidate site form completed in respect of land at Station Road, St Clears, Carmarthenshire. It is submitted on behalf of Mr Wynne Walters and Mr John Walters.
- 1.2 The wider site was previously submitted for the First Deposit Revised LDP in 2018 (Ref: SR/150/023) but only the road frontage portion was included as a residential allocation (LPA Ref: Sec18/h5 – Land adjacent to Gwynfa, Station Road for a total of 8 units within the plan period). This allocation is carried forward in the Second Deposit Revised Local Development Plan. Notwithstanding this, it is considered that the wider area the subject of the initial submission is also suitable for residential development and, therefore this document concerns the resubmission of the wider site on the land at Station Road, St Clears for future residential development.
- 1.3 The site is situated in the community of St Clears and is bordered by the communities of Meidrim, Newchurch and Merthyr, Llangynog, Laugharne Township, Llanddowror, Eglwyscummin, Llanboidy, and Llangynin which all lie within Carmarthenshire.
- 1.4 This submission will demonstrate that if the site proposed were given permission to be developed, provisions would be incorporated which would seek to ensure a high quality of design and layout, including retention and enhancement of peripheral vegetation in order to create a high quality form of development.
- 1.5 The Carmarthenshire Local Development Plan Review Report identifies the status of site allocations within current LDP. Within the adopted LDP 2006 - 2021 there are 8 housing allocations within St Clears, of some have been started or completed, including the Maes yr Hufenfa development for Wales & West Housing Association on Station Road. The total allocation for these sites equates to 98 dwellings. In the event that these allocations are not developed, it is considered the candidate site will offer a solution for short-term housing development. In comparison to several speculative land bank application provided within the plan, the applicant wishes to sell the site to a potential developer in the summer in order for the site to provide new dwellings to serve the area in the short term.
- 1.6 In terms of the content of the submission Section 2 of this report provides a brief description of the site; Section 3 discusses the overall planning policy context; Section 4 assesses the site in the context of criteria identified in Planning Policy Wales. Section 5 provides a summary and conclusions.

## 2 Site Description

- 2.1 This section discusses the site's general location and provides a brief description of the application site and its immediate surroundings.
- 2.2 St Clears is a community and small town situated in the unitary authority of Carmarthenshire. It is located approximately 13km to the west of the county town of Carmarthen and approximately 28km to the north-west of Llanelli. The B4299 (Station Road) runs in a north-south alignment along the eastern boundary of the site, providing access to Meidrim to the north and St Clears to the south. Within the current LDP St Clears is categorised as a service centre, which are *"well located on sustainable transport corridors and demonstrate a broad range of facilities and services which provide for the needs of the settlement and a wider local catchment. Their respective status within the County and their regional contribution is reflected within the WSP."*
- 2.3 The irregular shaped piece of land is roughly 3.5 acres in area and is currently used for agricultural purposes and is subject to an annual grazing agreement. Having considered the site and its characteristics, it is considered the site would be suitable for the allocation of approximately 42 residential dwellings. There is an existing electricity pylon located within the site, adjacent to the southern boundary. Consideration will be given to this constraint as part of any development that were to take place on-site.
- 2.4 The site is bounded to the north by greenfield land and existing residential dwellings fronting onto Station Road, to the east by Station Road, to the south by residential dwellings within the Rhyd-Y-Gors Estate, and to the west by greenfield land. In addition, the site is bounded on all sides with hedgerow (more defined on some boundaries of the site than others) and a very small element of tree coverage within the north-western area of the site.
- 2.5 In terms of local facilities, the site is located approximately a 600m walking distance from St Clears Town Centre (as defined within Policies RT4, RT5, and RT6 of the adopted Local Development Plan) to the south on Pentre Road. There are several amenities within the town centre boundary, including takeaways, cafes, convenience stores, and public houses. Moreover, Ysgol Griffith Jones and St Clears Leisure Centre are located approximately 250m to the south-east and 360m to the south of the site respectively. There is also a Co-op Food store located approximately 320m to the north.
- 2.6 The closest bus stops to the site is placed along Station Road, approximately 170m to the south of the site, providing services in both northbound and southbound directions. Service 224 runs from these stops, once every two hours, linking with settlements including Whitland, Pwll-Trap and Tavernspite. Other bus stops are located on Pentre Road to the south where a greater range of services are provided, connecting St Clears with destinations across Carmarthenshire and Pembroekshire including Carmarthen, Tanerdy, Haverfordwest and Pendine.
- 2.7 Another benefit in terms of public transport which has arisen since the first submission of the site is the proposed reopening of St Clears train station. The station last operated in 1964, however recent attempts have been made to re-open the station which has gained traction since 2021 when the station was selected as one of four station re-opening bids to go through to the final stage. The station will be located along the West Wales line, situated between Carmarthen and Whitland stations and is proposed to open in 2024. This will be of great benefit to the settlement of St Clears, and lies only 300 metres from

the candidate site. It will further encourage residents to travel in a sustainable manner and reduce car dependence in the area.

## 3 Planning Policy Framework

### Overview

3.1 The policy basis for this submission derives from the content and scope of national planning guidance. It is submitted that the residential land use proposed would be in accordance with national advice and guidance, its associated Technical Advice Notes (TANs), together with the Development Plan for the local area.

### 3.2 **The Well-Being of Future Generations (Wales) Act 2015**

The Well-Being of Future Generations Act requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change. To make sure we are all working towards the same purpose, the Act puts in place seven well-being goals. The Act makes it clear the listed public bodies must work to achieve all of the goals, not just one or two.

The seven well-being goals include:

1. *A prosperous Wales*
2. *A resilient Wales*
3. *A healthier Wales*
4. *A more equal Wales*
5. *A Wales of cohesive communities*
6. *A Wales of vibrant culture and Welsh Language*
7. *A globally responsible Wales*

### **Future Wales – The National Plan 2040**

3.3 Published on the 28th February 2021, Future Wales comprises the first development plan of its kind within Wales. It is a development plan with 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. The National Plan notes that the planning system must respond to these changes and contribute to a sustainable recovery, shaping places around a vision for healthy and resilient places. The strategy blends the existing settlement patterns and the distribution of jobs and homes with a vision of managing change and future trends for the benefit of everyone in Wales. Planning Policy Wales is the primary source of detail on how the planning system will support reconstruction efforts.

3.4 Future Wales is the highest tier of development plan and is focused on solutions to issues and challenges at a national scale. Due to its strategic nature, it does not allocate development to all parts of Wales, nor does it include policies on all land uses. It is a framework which will be built on by Strategic Development Plans at regional level and Local Development Plans at local authority level. As set out on Page 52 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years` time as follows:

A Wales where people live:

1. *...and work in connected, inclusive and healthy places*

2. ...in vibrant rural places with access to homes, jobs and services
3. ...in distinctive regions that tackle health and socio-economic inequality through sustainable growth
4. ...in places with a thriving Welsh Language
5. ...and work in towns and cities which are a focus and springboard for sustainable growth
6. ...in places where prosperity, innovation and culture are promoted
7. ...in places where travel is sustainable
8. ...in places with world-class digital infrastructure
9. ...in places that sustainably manage their natural resources and reduce pollution
10. ...in places with biodiverse, resilient and connected ecosystems
11. ...in places which are decarbonised and climate-resilient

- 3.5 Page 60 notes that *"In all parts of Wales the strategy supports sustainable growth. Any place without jobs, homes, community spaces and wildlife has no prospect of having a thriving and cohesive community, Welsh language or economy. There is such a thing as too much development or the wrong type of development, whereas sustainable development should foster a stable or growing population to ensure a healthy natural environment and economic and social stability"*.

### **Planning Policy Wales**

- 3.6 National planning policy is contained within the eleventh edition of Planning Policy Wales (PPW), published by the Welsh Government in February 2021. It is the principal document for planning considerations in Wales. PPW provides land use planning policy and should be taken into account when preparing planning applications. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. The planning system is central to achieving sustainable development in Wales. It provides the legislative and policy framework to manage the use and development of land in the public interest which is consistent with key sustainability principles.
- 3.7 Sustainable Development is defined at Page 7 of PPW as follows: *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals"*. Paragraph 1.18 sets out that *"legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated"*. Paragraph 1.18 of PPW relates to sustainability which emphasises that the planning system should provide for a presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated (Para 4.2.2). In Paragraph 2.3 it goes on to state that *"The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all."*
- 3.8 The Well-being of Future Generations (Wales) Act 2015 is brought up in PPW, which places a duty on public bodies (including Welsh Ministers) to carry out sustainable development. In carrying out this duty, actions which public bodies must take include:
- setting and publishing objectives ("well-being objectives") that are designed to maximise its contribution to achieving each of the well-being goals; and
  - taking all reasonable steps (in exercising its functions) to meet those objectives.

- 3.9 The Act puts in place seven well-being goals to help ensure that public bodies are all working towards the same vision of a sustainable Wales. These include the need for cohesive communities which are attractive, viable, safe and well-connected.
- 3.10 In addition, sustainable development should be achieved through the design which is described in Paragraph 3.3: *“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area.”*
- 3.11 In terms of housing, Paragraph 4.2.1 notes the following: *“Planning authorities must understand all aspects of the housing market in their areas, which will include the requirement, supply and delivery of housing. This will allow planning authorities to develop evidence-based market and affordable housing policies in their development plans and make informed development management decisions that focus on the creation and enhancement of Sustainable Places. New housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities”*. In relation to housing, PPW states that the planning system ought to: *“recognise a supply of land to assist the delivery of the housing needs to meet the varying requirements of communities across all tenures; offer provision of a spread of well-designed, energy efficient, high quality market and affordable dwellings that contribute towards the formation of sustainable settings; and concentrate on delivery of the recognised housing requirement and associated land supply”*.

### **Carmarthenshire Local Development Plan**

- 3.12 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the development plan unless material considerations indicate otherwise. The statutory development plan for this site is provided by Carmarthenshire Local Development Plan (LDP) 2006 – 2021 which was adopted by the County Council in December 2014.
- 3.13 The site is not allocated for development in the Adopted Plan, lying just beyond the settlement limits of St Clears, but should be considered through the review process as it lies within close proximity of facilities in the Sustainable Settlement of St Clears and is well related to the existing settlement pattern (as infill development).
- 3.14 The Carmarthenshire Local Development Plan Review will be required to make provision for future housing needs with an extended Plan Period to 2033, including those of individual settlements in accommodating necessary levels of growth to maintain communities and facilities. Within the current Second Deposit Revised Local Development Plan, the road frontage portion of the site is included as a residential allocation (LPA Ref: Sec18/h5 – Land adjacent to Gwynfa, Station Road for a total of 8 units within the plan period).
- 3.15 The following section will seek to establish that national planning guidance is broadly supportive of residential development taking place on the site. In these circumstances, therefore, it is submitted that these aspects should be taken into account when assessing the site through the LDP review site selection process.



## 4 Appraisal

- 4.1 This section examines how the submission site accords with prevailing planning policy in terms of identifying housing land allocations within development plans.

### **Availability of Previously Developed Land**

- 4.2 The site is not brownfield land but is well-connected to the current settlement pattern of St Clears and its development for residential purposes represents a logical area for development and inclusion within the settlement boundary, at this location. As previously noted, Ysgol Griffith Jones and St Clears Leisure Centre lie circa 250m to the south-east and 360m to the south of the site respectively. In addition to this, a Co-op Food store lies roughly 320m to the north. These facilities being within walking distance underline the sustainable credentials of the site.

- 4.3 In order to achieve a sufficient range and choice of housing land opportunities, there will be a need to consider sites which represent viable urban extensions, especially those which could contribute to the Council's housing land supply over a long period extending to 2033. This site can offer up to 42 residential units, and should therefore be seen as making an important contribution to land supply.

### **Accessibility**

- 4.4 There is an existing gated access found along the eastern boundary of the site (roughly in a central position along the eastern boundary), fronting onto Station Road. The location of the existing gate would be considered to be the most appropriate point of access for any future development.

- 4.5 Station Road, within the vicinity of the candidate site, has a speed limit of 30mph which would require visibility splays of 43m in both directions from the site access. This would be achievable, however, an element of the hedgerow may need to be cut back to allow the visibility to be maintained. A drawing based on Ordnance Survey/Topographical based survey data will be able to definitively confirm that visibility is achievable at this access location.

- 4.6 As already discussed, there a number of facilities within close proximity of the site, including a number of amenities within the defined boundary of St Clears Town Centre. There is also a school and food store located within close proximity of the site on Station Road. The site also benefits from good access to public transport routes with bus stops located on Station Road and Pentre Road providing good connections with nearby towns/settlements, including Carmarthen. In addition to this, the proposed St Clears train station is within walking distance of the site and would enable users to travel to a host of destinations across South Wales including Milford Haven, Carmarthen, Swansea and Cardiff.

- 4.7 In terms of pedestrian infrastructure, there are already existing footways located along Station Road (on both sides of the carriageway) along the eastern side of the site. This will benefit any future residents that may occupy the site if built for the purposes of residential development.

### **Land Ownership**

- 4.8 The land to which this Candidate Site Representation refers is within the joint-ownership of the Site Promoter – Mr Wynne Walters and Mr John Walters. Both landowners are fully committed to bringing forward the development of the site. As previously mentioned, both individuals are keen to sell site to a developer in the coming months and have had keen interest from regional developers who are interested in progressing the site towards development to meet the housing need of St Clears. This will help make

up for the fact that some of the housing allocation within the current plan for St Clears have not started or been completed.

### **Capacity of Infrastructure**

#### ***Utilities***

- 4.9 All utilities are readily available within the proximity of the site and discussions are underway with relevant utility providers to extend utility infrastructure as required. In addition, as the detailed design of the proposed development progresses, the provision of electric-charging on a plot-by-plot basis will be considered further.

#### ***Drainage***

- 4.10 The site is not affected by a flood risk area (which would prevent vulnerable forms of development such as housing), and it is considered that foul surface water will connect with the existing mains sewer.

#### ***Access***

- 4.11 Achieving sufficient widths and visibility at the site's proposed access point would be achievable if an extent of the existing hedgerow were to be cut back. A detailed drawing on Ordnance Survey/Topographical survey data will provide clarity. The development will provide the necessary pedestrian and cyclist infrastructure within the site to encourage residents to walk and cycle, with 2m wide footways included on one or both sides of the carriageway for its entire length and, where appropriate, shared use private drives also included, prioritising the needs of pedestrians and cyclists over that of vehicles.

### **Impact on the Community/Welsh Language**

- 4.12 A scheme at this location will provide a range and choice of house types and tenures, including affordable elements. It is not considered that the development of the site for housing will have any significant adverse impact upon the Welsh language or any local communities. Ysgol Griffith Jones is a bilingual primary school that has both Welsh and English streams, therefore the development of the site for residential purposes could lead to increased numbers of Welsh students at the school.

### **Physical and Environmental Constraints**

#### ***Ecology***

- 4.13 With the retention and enhancement of existing vegetation, there are considered to be no likely significant ecological issues conflicting with planning policy at any level and there are minimal legislative considerations as a result of potential impacts to legally protected species.

#### ***Visual Impact***

- 4.14 Overall it is considered that the proposal would not have any significant adverse impact upon the visual amenities of the area. Separation distances, to prevent any adverse or overbearing impacts, between proposed dwellings and existing dwellings can easily be provided.

### **Coalescence of settlements**

- 4.15 Development on the site would not result in the coalescence of settlements. Development of the site would result in a marginal extension of St Clears development limits, which makes sense as there is already existing development to the north, east and south. It would form a natural inclusion within the development limits of St Clears.

### **Flood Risk**

- 4.16 The site is not identified in the TAN 15 Development Advice Maps as being at risk from flooding.

### **Site Contamination**

- 4.17 In terms of ground conditions there are no known constraints that prevent the development of the site for residential uses.

### **Compatibility with Neighbouring Uses**

- 4.18 It is anticipated that all of the proposed dwellings would respond well to the established character of the surrounding area. It is anticipated that a range of dwelling types and sizes would be incorporated ranging from 2 beds up to 5 beds which forms the basis for interesting street scenes and helps establish a balanced community. Overall it is considered that the proposal would not have any significant adverse impact upon the residential amenities of existing or future occupiers.

### **The Potential to reduce carbon emissions through co-location with other uses**

- 4.19 The site is proposed for residential uses. However, an increase in population generated will allow help sustain local facilities and potentially increase demand for additional services to benefit the local community.

### **Relationship with Historic Environment**

- 4.20 The site is not located within or adjacent to the boundary of a Conservation Area. In addition, there are no historic assets within or adjacent to the site (including Scheduled Ancient Monuments; Listed Buildings; and Registered Historic Park or Garden).

### **Delivery of Key Placemaking Objectives**

- 4.21 Placemaking is at the heart of both 'Future Wales' and Planning Policy Wales (Edition 11, February 2021). As set out at Section 3 of 'Future Wales': "*Future Wales' Outcomes are overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales*". Preliminary investigations have identified that the candidate site can provide homes in the right place and create a sustainable, well-designed, and high-quality housing scheme, where people will want to live, in accordance with national placemaking objectives.

## Conclusion

- 5.1 This Candidate Site representation is made by Asbri Planning Limited on behalf of Mr Wynne Walters and Mr John Walters and requests that land at Station Road, St Clears is brought forward as a housing land use allocation through the Carmarthenshire County Council Second Deposit Revised Local Development Plan 2018 - 2033.
- 5.2 Within the First Revised Deposit LDP, the site frontage (referred to as 'Land adjacent to Gwynfa, Station Road) was allocated for residential use under Sec18.h5 for a total of 8 units within the Plan period.
- 5.3 Within the Second Revised Deposit LDP, the site continues to be identified as a housing allocation under Sec18.h5.
- 5.4 As per the representation submitted to the First Revised Deposit LDP, the wider site's partial inclusion as a housing allocation in the Second Revised Deposit LDP is supported, and in particular the acceptance of the residential component of the allocation.
- 5.5 In summary, of Mr Wynne Walters and Mr John Walters continue to support the Second Deposit Revised Plan on the basis that the Council have accepted the principle of residential uses at the scale proposed, but would respectfully suggest that the wider site is also acceptable as an appropriate residential allocation to ensure the comprehensive redevelopment of the wider site.
- 5.6 The allocation of the wider site would be required to assist in ensuring the adequate delivery of housing in the sustainable community of St Clears, which may not be achieved by the current housing land allocations which are slow to come forward. The scale and nature of this site would be attractive to house builders, which would facilitate delivery in the short to medium term. The site promoters are keen to sell the land in the near future in order for work to commence on the site as soon as possible.
- 5.7 The site could potentially deliver a possible further 42 dwellings of various types and sizes which could be phased as appropriate and which would complement the existing form of the settlement. It will not give rise to any significant adverse impacts upon the character of the area, local amenities, residential amenity and highway safety whilst providing a significant contribution to the area's housing land supply requirements as well as affordable housing. Furthermore, it is positioned in a sustainable location where several amenities lie nearby, and there are adequate public transport connections on offer.
- 5.9 This submission has assessed the site against prevailing planning policy in Wales. It is clear that the proposals are compatible with the relevant criteria. It is acknowledged that proposals will need to be refined on the basis of further comprehensive study information.
- 5.9 In light of the above, it is, therefore considered that Carmarthenshire County Council should, in its review of the Local Development Plan, identify the wider land at Station Road, St Clears as a larger housing land use allocation.



**Richard Bowen – Director  
Asbri Planning Ltd**

# Appendix 1

## Site Location

## Site Location Plan



**Legend**

- Other land with ownership
- Candidate Site Boundary

This Plan includes the following Licensed Data: OS MasterMap Colour PDF Location Plan by the Ordnance Survey National Geographic Database and incorporating surveyed revision available at the date of production. Reproduction in whole or in part is prohibited without the prior permission of Ordnance Survey. The representation of a road, track or path is no evidence of a right of way. The representation of features, as lines in the illustration of a property boundary. © Crown copyright and database rights, 2018. Ordnance Survey 0100031673



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