

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

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**Land South of Heol  
Horeb/Horeb Road, Five  
Roads**

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April 2023



# Summary

**Proposal**

Carmarthenshire Second Deposit Revised LDP Submission

**Location**

Land at Heol Horeb/Horeb Road, Five Roads, Carmarthenshire

**Date**

April 2023

**Project Reference**

20.156

**Client**

Mr Dale Bowler

**Product of**

Asbri Planning Limited

**Prepared by**

Rob Davies - Associate

**Approved by**

Iwan Rowlands – Graduate Planner

**Disclaimer**

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# 1 Introduction

- 1.1 This Second Deposit Plan representation submission document has been prepared in order to accompany the representation forms completed in respect of land at Heol Horeb/Horeb Road, Five Roads. It is submitted on behalf of Mr Dale Bowler.
- 1.2 The site was promoted as a candidate site in 2018, reference SR/061/002. Despite supporting information which was submitted, including a viability assessment, it was disappointing that the inclusion of the site within the development limits of the village was rejected for the following reasons:
- 'Development would lead to an unnecessary encroachment beyond the development limits. Reference is also made to the Plan's evidence base – notably the Stage 1 SFCA. The site will remain outside of the development limits'*
- 1.3 Whilst not wishing to question the overall soundness of the Plan, this representation presents evidence to show that the assessment carried out by the Council is inappropriate, and factors which include potential flood risk, will not result in any material harm in planning terms. Consequently, this document concerns the resubmission of the site at the land at Heol Horeb/Horeb Road, Five Roads for future residential development.
- 1.4 The submission seeks to demonstrate that the site is deliverable in terms of the modest proposal for four detached dwellings where provisions would be incorporated which would seek to ensure a high quality of design and layout, and which would also address the aforementioned site issues.
- 1.5 The site is situated in Horeb, part of a tier 3 sustainable village along with Five Roads in the deposit LDP. Within the deposit LDP there are 2 housing allocations in the settlement of Five Roads/Horeb noted under Policy HOM1 (Housing Allocations). The first allocation is at Clos Y Parc (SuV23/h1), which formed part of a larger allocation in the current Adopted LDP (2006-2021) identified for 34 dwellings (SC37/h1). This allocation has been built out and has delivered 25 dwellings in total, resulting in a shortfall of 9 dwellings. Within the deposit plan, part of the same site has an allocation for 16 dwellings (SuV23/h1). As aforementioned this has already been built out. An outline application was submitted indicating that 20 units would be built on this part of the site (Ref: S/33722), although a subsequent reserved matters application revealed only 16 dwellings would be built (Ref: S/40024) which meets the indicative figure provided in the deposit LDP. The key point to note is that the entire allocation has been built by Enzo Homes. As a result of this, there is no justification for noting the site as a housing allocation site within the deposit plan.
- 1.6 In terms of the second site at the land adjacent to Little Croft which is indicatively identified for 25 dwellings (SuV23/h2), the site has not been subject to any planning applications and no attempts have been made to ensure its delivery although it has been allocated within the current LDP since its adoption in 2014. There is very little indication to suggest this site will be developed over the next plan period. Having considered both sites within the deposit plan, it is clear that other plots of land ought to be forward as candidate sites for residential development within the tier 3 village of Horeb/Five Roads.
- 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 plan policies and sustainability assessment; Section 4 assesses the site in the context of criteria identified in Planning Policy Wales. Section 5 provides a summary and conclusions.



## 2 Site Suitability and Need Considerations

- 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 Horeb is a small village situated approximately 500 metres to the east of Five Roads. The site lies 4.5 miles north of Llanelli town centre, and is located 12.5 miles south east of the county town of Carmarthen. Within the current LDP Horeb/Five Roads is categorised as a sustainable community, where *"land allocations will be identified in the most sustainable settlement or settlements which possess the greater level of essential services and facilities, and where there are suitable opportunities for the release of land for development"*.
- 2.3 The site lies immediately south of Heol Horeb, which forms part of a larger network of rural roads, and links the B4309 with the A476 at Llannon to the east. The site is roughly 0.7 hectares in area and occupies part of a field parcel, the whole of which is in the ownership of the site promoter. The western boundary has been drawn in order to correspond with the extent of built development on the northern side of the road, where a detached property has been constructed.
- 2.4 The field is utilised for rough grazing and, as such is poor quality agricultural land. Regarding the landscape, it is contained by mature hedgerows with a wooden fence along the boundary to Heol Horeb. It directly abuts existing development to the east. The site is predominantly even (levels range from 126.8m AOD and 132.2m AOD) and there are consequently no gradient limitations.
- 2.5 It is considered that development of the site for residential purposes would effectively consolidate this part of the settlement by rounding off along a cluster of development, opposite established properties and immediately adjoining the main part of the village of Horeb. Any development on this site will positively contribute to the aesthetic and visual qualities of the immediate locality, particularly with the retention of peripheral vegetation and the creation of a biodiversity enhancement area immediately to the west.
- 2.6 Unlike other candidate sites submitted, the proposal would not erode the remaining gap between Horeb and Five Roads. Opportunities should be made for some proportional housing growth within Tier 3 settlements over the entire plan period running until 2033. Whilst being applicable to Tier 4 settlements (Rural Villages) Policy HOM3 enables a sustainable amount of growth in rural villages by adding a small number of homes that represent a minor infill or logical extension of the existing built form. This appears far more realistic, allowing increased opportunity to focus on aspects such as design which matches the character of the neighbouring surroundings. Policies such as HOM3 ought to be included within the next LDP as at present, the lack of rural housing opportunities is having a detrimental effect on rural communities, companies and the economy in rural settings. Although Horeb/Five Roads is not categorised as a rural village, and as aforementioned is a Tier 3 settlement, the number of dwellings proposed for the site is only a small figure that would not be detrimental to the settlement, whilst representing a suitable rounding off of the settlement itself. Therefore, it is contested that the settlement limit should be extended to encompass the site itself.
- 2.7 The village consists of a mixture of traditional cottages and newer, detached properties, most of which have generous plot sizes. The anchor point of the village is the Waun Wyllt Inn, which is a popular rural pub/restaurant in the area, catering for cyclists and walkers who use the nearby National Cycle Route, and also serves as a wedding venue. A support letter from the public house is provided in Appendix E, who are in full support of developing the nearby site for residential purposes. The development of residential dwellings would attract additional visitors to the public house and enable it to be supported further. In

recent times, the pub had been closed for an extended period of time and was in fact up for sale. There was potential interest in transforming it into a residential dwelling which would have led to the loss of a valuable community facility for Horeb and Five Roads. Nevertheless, the pub has fortunately re-opened and locating residential development nearby will only enhance its operation and contribute to its future success.

- 2.8 In overall sustainability terms the site lies roughly 650 metres from the vast majority of facilities in Five Roads, including a post office/shop, community centre and primary school. The site is also within immediate reach of the National Cycle Network Route 47 which utilises an old railway corridor through Horeb. National Cycle Route 47 runs from Newport to Fishguard and forms part of the Celtic Trail West, with it 195 kilometers long in total. A regular bus service (195) operates between Llanelli and Carmarthen, with the bus stop located by the post office. The nearest train station is located in Llanelli, with services calling at the station operated by Great Western Railway and Transport For Wales. Services head to a host of destinations including Milford Haven, Cardiff Central, Manchester Piccadilly and London Paddington.
- 2.9 Inclusion of this site within settlement limits would assist with the delivery and management of the Horeb and Five Roads community by continuing to promote use of the local primary school, community centre and public houses, assisting to sustain those community facilities. Furthermore, the settlement boundary proposed for Horeb in the deposit LDP shows there are no opportunities for additional proportional housing growth. Consequently, other housing allocation/opportunities for the area ought to be considered.
- 2.10 The site assessment makes reference to the proposal being contrary to the LDP evidence base, in the form of the Stage 1 Strategic Flood Consequences Assessment. In order to demonstrate that this is inappropriate, a Flood Assessment Report has been commissioned from Francis Sant, with this included in Appendix D.
- 2.11 The report states that while the site lies within Zone A on the Development Advice Map, and is not considered to be at risk of fluvial flooding, surface water maps indicate that it may be at risk and hence a flood assessment is required to consider the risk and possible mitigation measures. Moreover, upcoming changes to TAN 15 indicate that they will be adopting the NRW Flood Map for Planning. The site is not shown to be at risk of flooding from rivers and seas, however it does lie within Zones 2 and 3 for surface water and small watercourse flooding.
- 2.12 The report in Appendix D concludes that the surface water flood maps would indicate that there is a low risk of flooding over most of the site although the depth and hazard is generally expected to be low. The main risk of flooding would occur downstream of the site with water failing to drain into a culvert and instead flowing onto the road and subsequently towards the houses lower down than the site. The development offers a unique opportunity to reduce this risk while also providing benefits in terms of biodiversity and improving the water quality. The proposed plots are also expected to remain flood free for the considered events.

### 3 Comments of Plan Policies and SA Assessment

- 3.1 Housing need within rural areas of Wales has always been an issue. In 2022, 96% of dwellings within the settlement of Cwm-yr-Eglwys in Pembrokeshire were holiday homes. Within Future Wales, it notes that in rural areas *"Where housing, employment, key services and infrastructure are not sufficient to accommodate current or future needs, or are not easily accessible, the resilience and sustainability of an area may be undermined, possibly leading to economic and social decline"*.
- 3.2 Paragraph 9.3 of the Revised Draft LDP correctly recognises the role that smaller settlements within Carmarthenshire have in delivering local and sustainable growth. This is further expanded upon in Paragraph 9.16 which again correctly recognises that by supporting growth of a proportionate scale in such areas, a positive contribution can be made towards the long term sustainability and cohesiveness of rural communities and the rural economy.
- 3.3 It is clear that there is a reliance on larger sites within rural areas which can be difficult to deliver. Due to issues around deliverability, this has impacted the resilience of housing land supply, with these larger sites not delivering the dwellings promised. A different approach is warranted in certain areas of Carmarthenshire, with a large proportion of the County being rural in nature. Within Tier 3 settlements (Sustainable Villages), sites that are small in scale but are easily deliverable ought to be favoured as they will be able to meet the housing need in an easy manner whilst not hampering the character of the area.
- 3.4 The Moving Rural Carmarthenshire Forward Report conducted in 2019 stated that in order to make rural areas attractive for younger people adequate housing needed to be provided to ensure that they could remain within their local communities. The report stated that a shift was required from depending on large housing developments to focusing more on smaller scale residential developments that would address housing requirements in rural settlements. A survey produced during the report revealed only 15% of respondents were happy with the housing provided within their rural area.
- 3.5 It is imperative that a sustainable and proportionate amount of housing growth is allowed in rural areas of Carmarthenshire during the plan period. The lack of such housing at present has unfortunately resulted in younger individuals departing rural areas, looking for housing and work in urban areas which is having a detrimental impact upon the resilience of rural areas
- 3.6 In terms of policy within the deposit LDP, the two key policies are SD1 (Development Limits) and HOM1 (Housing Allocations). In terms of Policy SD1, the site discussed in this statement ought to be included within the settlement boundary of Horeb as it would represent a natural rounding off of the settlement directly opposite existing properties. The development proposed would be small scale that would result in an apt extension of the settlement, therefore this will not go against the deposit plan.
- 3.7 In respect of Policy HOM1, two arguments can be made in respect of the allocations noted for the tier 3 settlement of Five Roads/Horeb. There is no proof that the site at the land adjacent to Little Croft (SuV23/h2) will be delivered despite it being allocated in the current adopted LDP since 2014, therefore it ought to be removed from the deposit plan. The site has not been subject to a planning application, and apart from a statement revealing the developer's interest, there is little suggestion that the site will be developed.

- 3.8 Regarding the Clos Y Parc site (SuV23/h1), the site has already been built out providing 16 dwellings as stated in the deposit LDP, therefore the site does not warrant its inclusion in the deposit plan. Furthermore, this allocation formed part of a wider allocation in the current adopted LDP for 34 units. Only 25 dwellings have been built in total on this site, resulting in a shortfall in delivery of 9 dwellings.
- 3.9 A Sustainability Assessment against the Council's identified objectives is included in Appendix C. This demonstrates that the inclusion of this proposed development site will have no impact of any interests of acknowledged importance, and, due to its relationship with adjacent development will be seen as a logical rounding-off of the village at this location.

## 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 Horeb/Five Roads and its development for residential purposes represents a rounding off along a cluster of development, opposite established properties and immediately adjoining the main part of the village of Horeb. The site is located within walking distance of Five Roads, where several facilities and services lie including a public house, primary school and post office. These facilities lying within walking distance of the site underline the sustainable credentials of the site.
- 4.3 Having considered the settlement boundary for Horeb within the Deposit LDP, it is evident that this site should be brought forward as there are no adequate sites for additional proportional housing growth within Horeb. Furthermore, as previously mentioned, one of the housing allocations in the Deposit LDP at Clos Y Parc has already been built out, although it remains in the plan. This site has delivered 25 houses in total despite the current LDP indicatively identifying it for 34 units, whilst no progress has been made in respect of the allocation at land adjacent to Little Croft. The latter site has been within the plan since 2014, although it has no planning history and there is no evidence to suggest that it will be delivered at any point. Welsh Government advice is to remove such sites which have proved to be undeliverable. It is understood that the landowners may live abroad and have no intention to dispose of the site to developers. This further enforces the fact that alternative sites within the settlement need to be brought forward.

### **Accessibility**

- 4.4 An access to the site will be located off Heol Horeb which will enable entry to all four dwellings. The road within the site will consist of permeable paving.
- 4.5 Horeb Road, which runs past 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 will need to be cut back to allow good visibility. 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 the Waun Wylt Inn which is an anchor building within Horeb. As previously mentioned, there are several facilities within neighbouring Five Roads. The site also benefits from good access to public transport routes with a bus stop located half a mile away by Five Roads post office. It is serviced on a regular basis by the 195 that runs to two growth areas within Carmarthenshire, those being Llanelli and Carmarthen respectively. Furthermore, the site lies in close proximity to National Cycle Route 47 that runs through the Pembrokeshire Coast National Park and joins up with Carmarthen, Llanelli and Swansea.
- 4.7 In terms of pedestrian infrastructure, whilst there are no footways along the road, this is not uncharacteristic for such an area, and pedestrians are safe to walk along the road as vehicles travel at sensible speeds, and the road is never particularly busy.

### **Land Ownership**

- 4.8 The land to which this Candidate Site Representation refers is within the joint-ownership of the Site Promoter – Dale Bowler. The landowner is fully committed to bringing forward the site for residential development.

### **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 Flood Assessment Report assesses the existing rainfall runoff rate from the site and considered potential solutions that ensures that this rate is not exceeded post development. Sunken gardens will offer attenuation for the dwellings.

#### **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 removed. A detailed drawing on Ordnance Survey/Topographical survey data will provide clarity.

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

- 4.12 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. Furthermore, the primary school in Five Roads is Welsh medium, which will likely benefit from additional Welsh speakers were the site to be developed. Inclusion of this site within settlement limits would also assist with the delivery and management of the Horeb and Five Roads community by continuing to promote use of the community centre and public houses, assisting to sustain those community facilities and the associated Welsh speaking elements of the wider communities.

### **Physical and Environmental Constraints**

#### **Ecology**

- 4.13 In terms of ecology, it is unlikely that there will be any significant issues. In order to assess the current state of the site, a Preliminary Ecological Assessment will be conducted. There appears to be an opportunity for trees, shrubs and native plants to be planted around the site.
- 4.14 A Preliminary Ecological Assessment was carried out by Eyr Gwyn Ecology in September 2016. This established that the proposed development location does not contain any statutory sites of nature conservation interest, such as Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SAC), National Nature Reserves (NNRs) or Local Nature Reserves (LNRs) etc. Additionally, no sites are within 1km.
- 4.15 The desk study and field survey however, identified the following ecological constraints:
- The area of marshy grassland and semi improved neutral grassland as well as boundary features offer a range of foraging and shelter opportunities for reptiles;

- The tree line and scrub understorey that runs parallel to the road provides sub-optimal habitat for hazel dormouse
- The stream on the northern boundary of the site in addition to the smaller stream on the southern boundary was considered suitable to support otters.
- Trees and scrub provide potential bird nesting habitat; and
- Invasive species were noted at the site, namely, Himalayan balsam *Impatiens Glandulifera*

4.16 As part of the flood prevention measures identified in the Flood Assessment Report, it is proposed to include measures that will enhance biodiversity of the area, improve the quality of the water in the watercourses, reduce the peak flow running to the culvert on the north west corner of the site and reduce the risk of flooding to adjacent properties while ensuring the development remains flood free even during a 1 in 1000 year event.

The proposed measures include:

- 1) designing the access road bridge to accommodate the Q1000 flow;
- 2) lowering the ground levels on the upstream end of the site to provide attenuation (not for surface water from the houses) with a controlled discharge rate;
- 3) planting trees, shrubs and other native plants around the attenuation area;
- 4) widening the watercourses on one side some 200mm above the bed level (see Figure 4.2);
- 5) create minor dams in the watercourses to reduce the conveyance rate and provide attenuation;
- 6) plant grasses on the widened area along with the occasional shrub to provide a filter mechanism;
- 7) lowering the ground levels on the downstream end of the site to provide attenuation (not for surface water from the houses) with a controlled discharge rate.

#### **Visual Impact**

4.17 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 can easily be provided.

#### **Coalescence of settlements**

4.18 Development on the site would not result in the coalescence of settlements. The development would result in a logical extension of the settlement limit as proposed around the site that will enable proportional growth in a suitable fashion, that takes into consideration the existing character and appearance of the settlement.

#### **Flood Risk**

4.19 The site is not identified in the TAN 15 Development Advice Maps as being at risk from flooding from rivers and seas. Surface water flood maps reveal that there is a low risk of flooding over most of the site although the depth and hazard is typically expected to be low. The main risk of flooding would occur downstream of the site with water failing to drain into a culvert and instead flowing onto the road and subsequently towards the houses lower down than the site. Furthermore, the Flood Map for Planning that is to adopted shortly only shows the site to be affected by surface water and small watercourses which is addressed within the Flood Consequence Assessment in Appendix D.

#### **Site Contamination**

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

#### **Compatibility with Neighbouring Uses**

- 4.21 It is anticipated that all of the proposed dwellings would respond well to the established character of the surrounding area. Dwellings lie immediately north and east of the site, therefore the addition of 4 more dwellings within this area would not disrupt the character and appearance of the area.

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

- 4.22 The site is proposed for residential uses. However, an increase in population generated will help sustain local facilities such as the Waun Wyllt Inn which was previously closed and up for sale, and potentially increase demand for additional services to benefit the local community.

#### **Relationship with Historic Environment**

- 4.23 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**

- 4.24 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 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 Second Deposit Plan representation is made by Asbri Planning Limited on behalf of Dale Bowler and requests that land south of Horeb Road/Heol Horeb, Five Roads, subject of an earlier Candidate Site submission is brought forward as a housing land use allocation through the Carmarthenshire County Council Second Deposit Revised Local Development Plan 2018 - 2033.
- 5.2 The extension of the settlement limit to include the site would deliver a proportional amount of housing growth within the settlement over the plan period. It would assist in ensuring the adequate delivery of housing within Five Roads/Horeb that is highly unlikely to be delivered within the housing allocation referenced in the deposit plan.
- 5.3 The number of dwellings proposed is not enough for a housing allocation, although objections are made to the following policies within the deposit plan:
- a) Object to Policy SD1 (Development Limits) – the site shown in Appendix A ought to be included within the settlement boundary of Five Roads/Horeb. The land is proposed for a small scale residential allocation that would complement the existing settlement, representing proportional growth in a controlled manner along with a clear rounding off of the settlement, with dwellings situated opposite. Furthermore, there are no vacant plots within the settlement boundary of Horeb.
  - b) Object to Policy HOM1 (Housing Allocation) – the land adjacent to Little Croft ought to be removed from the deposit plan as no attempts have been made to bring the site forward, and there is no indication that it will be developed any time soon.
  - c) Object to Policy HOM1 (Housing Allocation) – the Clos Y Parc site has already been built out. Within the deposit plan, the site is allocated for 16 dwellings, all of which have been delivered. Secondly, the site originally formed part of a larger housing allocation in the current adopted LDP which aspired to achieve 34 dwellings but in reality only delivered 25, resulting in a shortfall of 9 dwellings. One way of making up for this shortfall is to permit residential development in other areas of the settlement, and the proposed site at Horeb will positively contribute in this respect.
- 5.4 Due to the issues discussed with the current allocations in the deposit plan, it is imperative that solutions are found. Extending the development limit to incorporate this site would promote sustainable growth in a way that takes into consideration the nature of the current settlement, and would effectively consolidate this part of the settlement by rounding off along a cluster of development, opposite established properties and immediately adjoining the main part of the village of Horeb.
- 5.5 There needs to be an opportunity for some proportional housing growth within this tier 3 settlement that can be facilitated over the plan period until 2033. Evidence has been provided in Appendix E that the principal business within Horeb, the Waun Wyllt Inn is in favour of bringing this site within settlement limits as it would be a massive boost not only to the public house, but the wider area. In addition to this, a Sustainability Assessment is provided which shows that the development of the site would meet the LDP SA objectives.
- 5.6 The site could potentially deliver 4 dwellings 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 suitable 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 that can be accessed on foot. It is also considered acceptable in terms of flood risk as evidenced in the below appendices.

- 5.7 In light of the above, it is, therefore considered that Carmarthenshire County Council should, in its review of the Local Development Plan, extend the settlement boundary of Horeb around the site and in so doing confirming its acceptance in principle for housing.

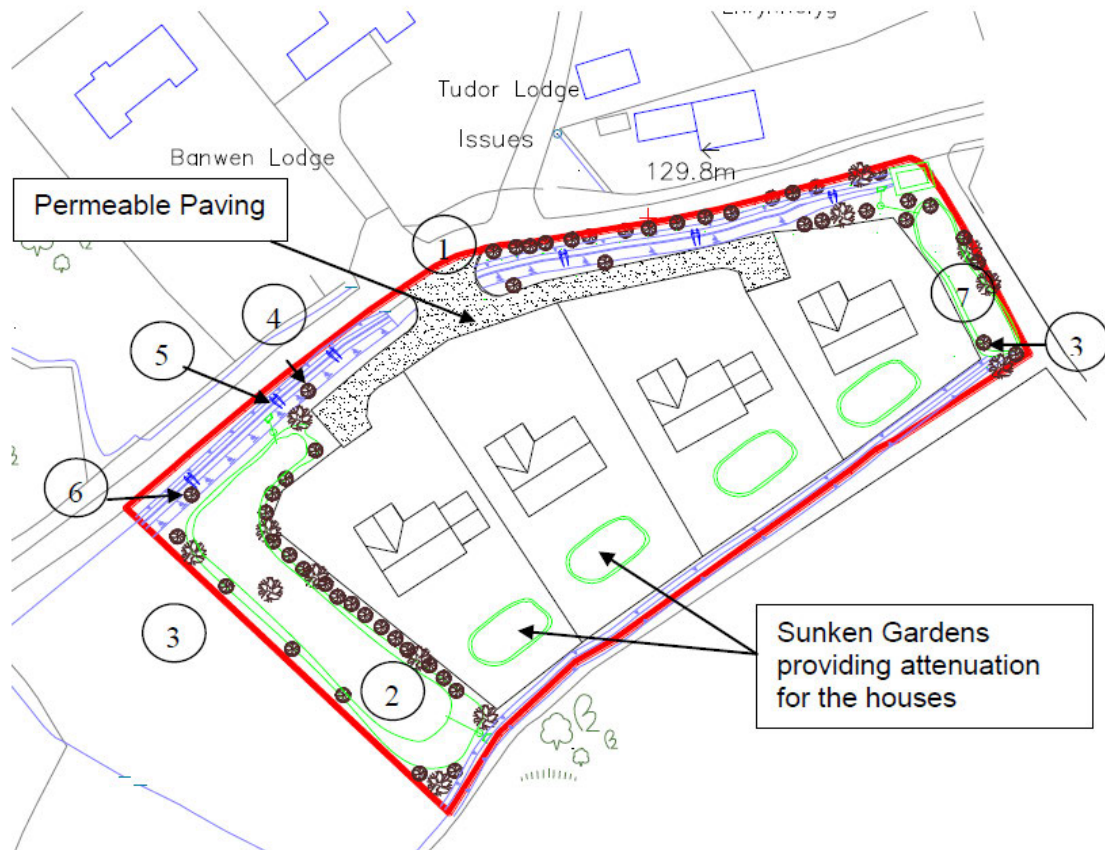
# Appendix A

## Site Location



## Appendix B

### Site Layout Plan



# Appendix C

## Sustainability Assessment Form

## Land S of Horeb Road, Horeb (WA Bowler Ltd) – Assessment against LDP Sustainability Objectives

Question	Data Source	Relevant SA Objective(s)	Comments
Q1. Is the site compatible against the location of future growth presented in the Deposit LDP?	LDP Deposit Plan	SA1	Yes – the modest level of growth proposed is compatible with the Tier 3 – Sustainable Village category for Five Roads/Horeb under Cluster 2 (Llanelli).
Q4. Is the site located within a flood risk zone as identified in the TAN 15 Development Advice Maps? (C1 or C2 Zone)	<p>Background information:  <a href="https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/development-and-flood-risk/?lang=en">https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/development-and-flood-risk/?lang=en</a></p> <p>Maps: <a href="http://geodiscoverer/">http://geodiscoverer/</a></p> <p>Click and search for:</p> <ul style="list-style-type: none"> <li>TAN15 Zone C1</li> <li>TAN15 Zone C2</li> </ul>	SA4, SA5	No – the site lies within Zone A. The NRW maps do however indicate potential issues with surface water flows. To address this a Flood Assessment Report has been prepared which assesses the level of risk and proposes appropriate mitigation. The Report concludes that the development offers a unique opportunity to reduce risk of flooding downstream while also providing benefits in terms of biodiversity and improving the water quality. The proposed plots are also expected to remain flood free for the considered events.
Q5. Is the site located within or immediately adjacent to any sites designated for importance to nature conservation?	<p>LDP Constraints Maps:  <a href="https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carldpconstraints">https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carldpconstraints</a></p> <p>Sites to be identified are:</p> <ul style="list-style-type: none"> <li>Sites of Special Scientific Interest (SSSI)</li> <li>Special Areas of Conservation (SAC)</li> <li>Special Protection Areas (SPA)</li> <li>National Nature Reserves (NNR)</li> <li>Local Nature Reserves (LNR)</li> <li>Common Land or registered village green</li> </ul>	SA2	No – an earlier Preliminary Ecological Assessment has established that the site does not contain any statutory sites of nature conservation interest, such as Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SAC), National Nature Reserves (NNRs) or Local Nature Reserves (LNRs) etc. Additionally, no sites are within 1km.



Q6. Is the site located within or immediately adjacent to any Scheduled Monuments?	LDP Constraints Maps: <a href="https://carmarthenshire.opus4.co.uk/planning/loca">https://carmarthenshire.opus4.co.uk/planning/loca</a>	SA8	No
	<a href="#">lplan/maps/carldpconstraints</a>		
Q8. Would the development of the site have a detrimental impact on the character and setting of the settlement or its features?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/cou">https://www.carmarthenshire.gov.wales/home/cou</a>	SA8 SA9	No - its relationship with adjacent development will be seen as a logical rounding-off adjoining and directly opposite established properties. In terms of the proximity of the site to existing residential properties, the site directly abuts established and recently constructed development, and in terms of the pattern and form of the settlement will consolidate the village form.
	<a href="#">ncil-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>		
Q9. Will the proposal involve the re-use of suitable previously developed land and/or buildings?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/cou">https://www.carmarthenshire.gov.wales/home/cou</a>	SA9, SA7	No
	<a href="#">ncil-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>		
Q12 Have any significant and evidenced highway issues been identified relating to the site?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/cou">https://www.carmarthenshire.gov.wales/home/cou</a>	SA3	No – direct access can be provided off Heol Horeb with adequate visibility provided.
	<a href="#">ncil-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>		
Q13 Does the site have suitable access to public transport and/or active travel route?	LDP Constraints Maps: <a href="https://carmarthenshire.opus4.co.uk/planning/loca">https://carmarthenshire.opus4.co.uk/planning/loca</a>	SA3, SA4, SA6, SA12, SA13, SA15	Yes -The site is within immediate reach of the National Cycle Network Route 47 at Horeb A regular bus service (195) operates between Llanelli and Carmarthen within 600 metres of the site.
	<a href="#">lplan/maps/carldpconstraints</a>		
Q14 Does the site have access to green space/ leisure/ recreational facilities that are within a reasonable distance?	LDP Proposals Maps: <a href="https://carmarthenshire.opus4.co.uk/planning/loca">https://carmarthenshire.opus4.co.uk/planning/loca</a>	SA12, SA15	Yes – it is close to the aforementioned National Cycle Route, a network of rural footpaths, and some 700 metres from play facilities and a cricket pitch in Five Roads. The new school will also deliver a multi use games area (MUGA) for public use.
	<a href="#">lplan/maps/carldpprop</a>		

Q15 Is the site within reasonable distance to: (a) Employment provision (b) Retail provision (c) Other services and facilities	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA6, SA10, SA14, SA15	Yes- the site is within reasonable walking distance of the post office/shop in Five Roads. Facilities such as the primary school, public houses, and surrounding rural activities provide for employment opportunities.
Q16 Is the site within a reasonable distance to education facilities?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA13	Yes – within 700 metres of Five Roads Primary School, scheduled to be replaced by a new facility on adjacent land.
Q17 Is the site located within or adjacent to a mineral buffer zone?	LDP Constraints Maps: <a href="https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carldpconstraints">https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carldpconstraints</a>	SA6	No
Q18 Is the site within or immediately adjacent to an AQMA?	LDP Constraints Maps: <a href="https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carldpconstraints">https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carldpconstraints</a>	SA3	No
Q19 Does the site contain high carbon soil e.g. peat?	A map of peat resources can be found here: <a href="https://www.bgs.ac.uk/mineralsuk/search/home.html">https://www.bgs.ac.uk/mineralsuk/search/home.html</a>	SA7	No
Q20 Does the site contain high quality agricultural land?	Maps: <a href="http://geodiscoverer/">http://geodiscoverer/</a> Click and search for: <input type="checkbox"/> Predictive Agricultural Land Classification	SA7	No – only suitable for rough grazing
Q21 Are there any significant concerns set out in the SFCA - Stage 1 which could impact on the delivery of the site?	The Stage 1 SFCA of all candidate sites can be accessed here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA4, SA5	No – as established by the submitted Flood Assessment Report (see above).

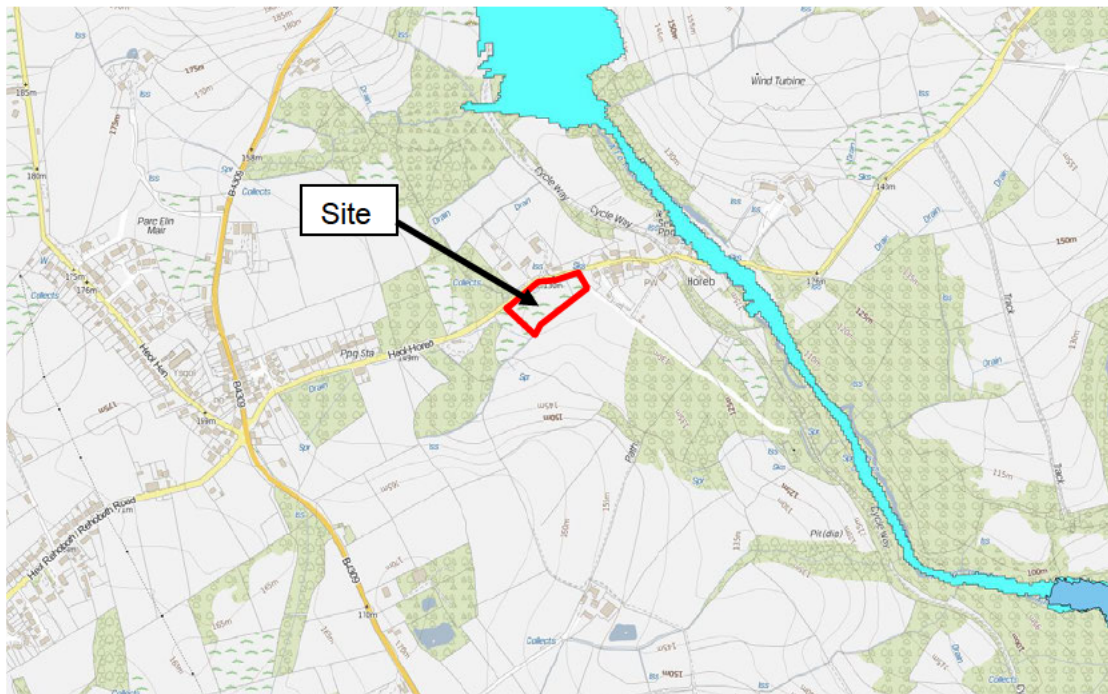
Q22 Does the site have an available water connection?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA5	Yes – serving existing, nearby properties.
Q23 Does the site have a suitable sewerage connection?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA5	Yes – in commenting on a previous outline planning application (S/32071) Dwr Cymru/Welsh Water had no objections to the development.
Q25 Does the location and/or scale of the site have the potential to have a detrimental impact on Welsh Language?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA11	No- Inclusion of this site within settlement limits would assist with the delivery and management of the Horeb and Five Roads community by continuing to promote use of the local primary school, community centre and public houses, assisting to sustain those community facilities and the associated Welsh speaking elements of the wider communities.
	<a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">plan-2018-2033/development-of-an-evidence-base</a>		

## Appendix D

### **Flood Assessment Report**

# Francis Sant

## Development Off Horeb Road, Five Roads Flood Assessment Report



**March 2020**  
**Final**  
**Revision A**

Project	Development Off Horeb Road, Five Roads
Document	Flood Assessment Report
Status	Final
Revision	A
Project Number	R/WD/D/1944
Date	March 2020
Client	WA Bowler Ltd
Consultant	Francis Sant Limited
Office	<div>██████████</div> <div>██████████</div> <div>██████████████████</div> <div>██████████</div>
Author	Ceirion Herbert
Telephone	██████████
E-mail	██████████████████████████████

This document has been produced in accordance with Francis Sant Limited Quality Management System

Signed ..... 

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Date ..... March 2020 .....

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2 The Development	3
3 Flood Risk	7
4 Discussion	12
5 Conclusion	14







## 2 THE DEVELOPMENT

### 2.1 Location

The proposed site (coordinates 249600 205600) is situated off Horeb Road, Five Roads and currently used for rough grazing. It is located east of the village (see Figure 2.1 to 2.4 and Plate 2.1) and close to the Hamlet of Horeb with houses to the north and east of the site. There is grazing land to the south, west and to the north west, beyond the highway which generally runs along the site's northern boundary. There is a minor watercourse running along the sites southern and eastern boundaries as well as the northern boundary.

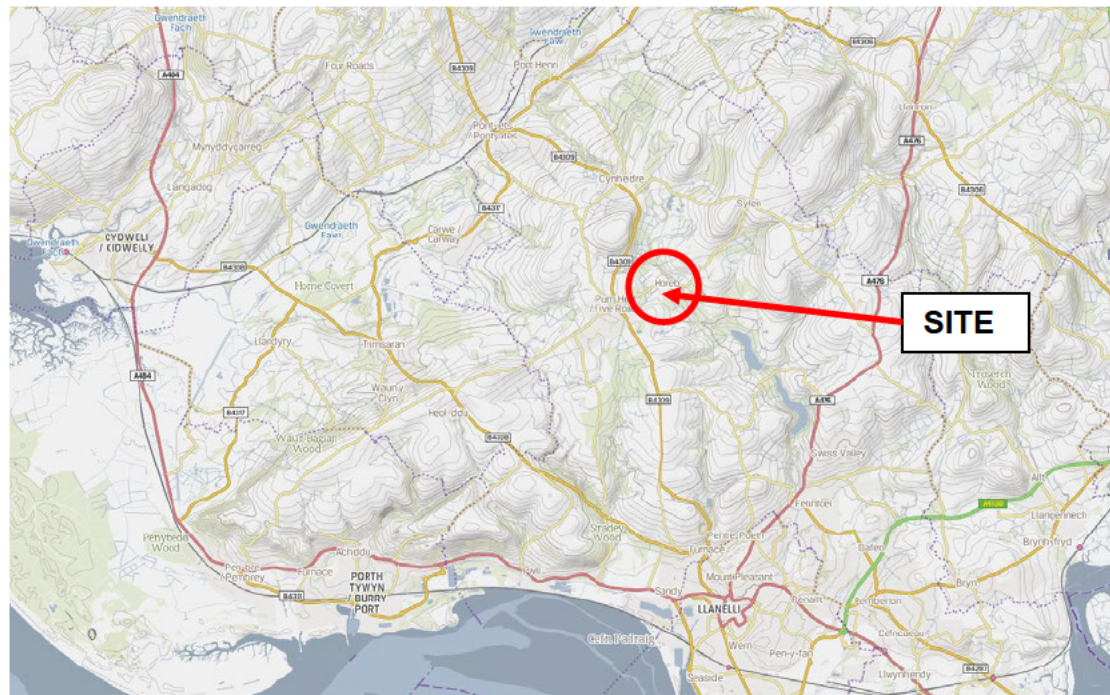


Figure 2.1 – Location Plan

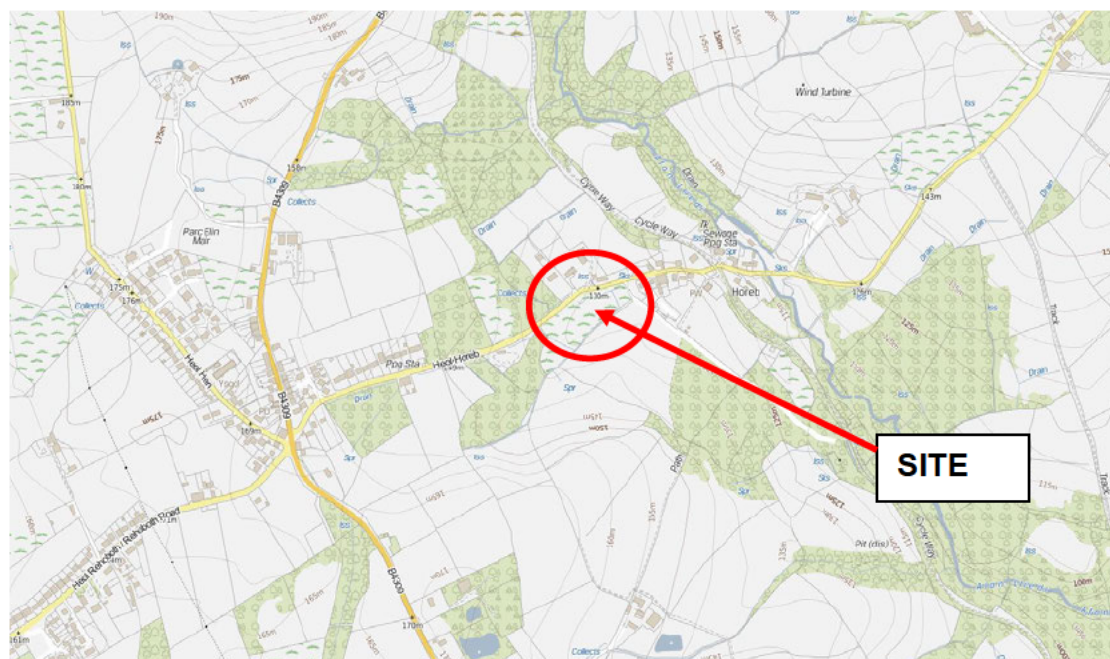


Figure 2.2 – Location of Site

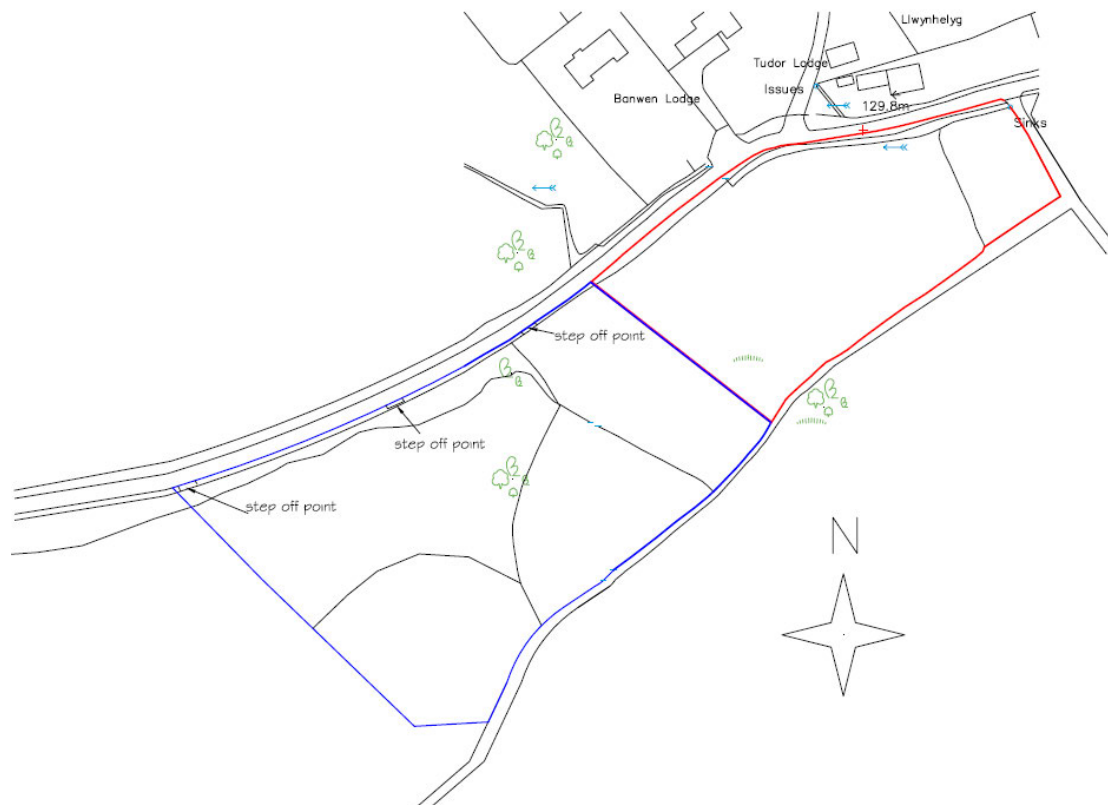




Figure 2.3 – Plan of Area



Plate 2.1 – Aerial Photograph of Site



**Figure 2.4 – Plan of Site**

### **Proposed Development**

It is proposed to build four detached 4 bedroom houses, along with an access road, driveways, and parking areas, on land off Horeb Road (see Figure 2.5). In addition it is proposed to include ecological enhancement schemes on the surrounding land.

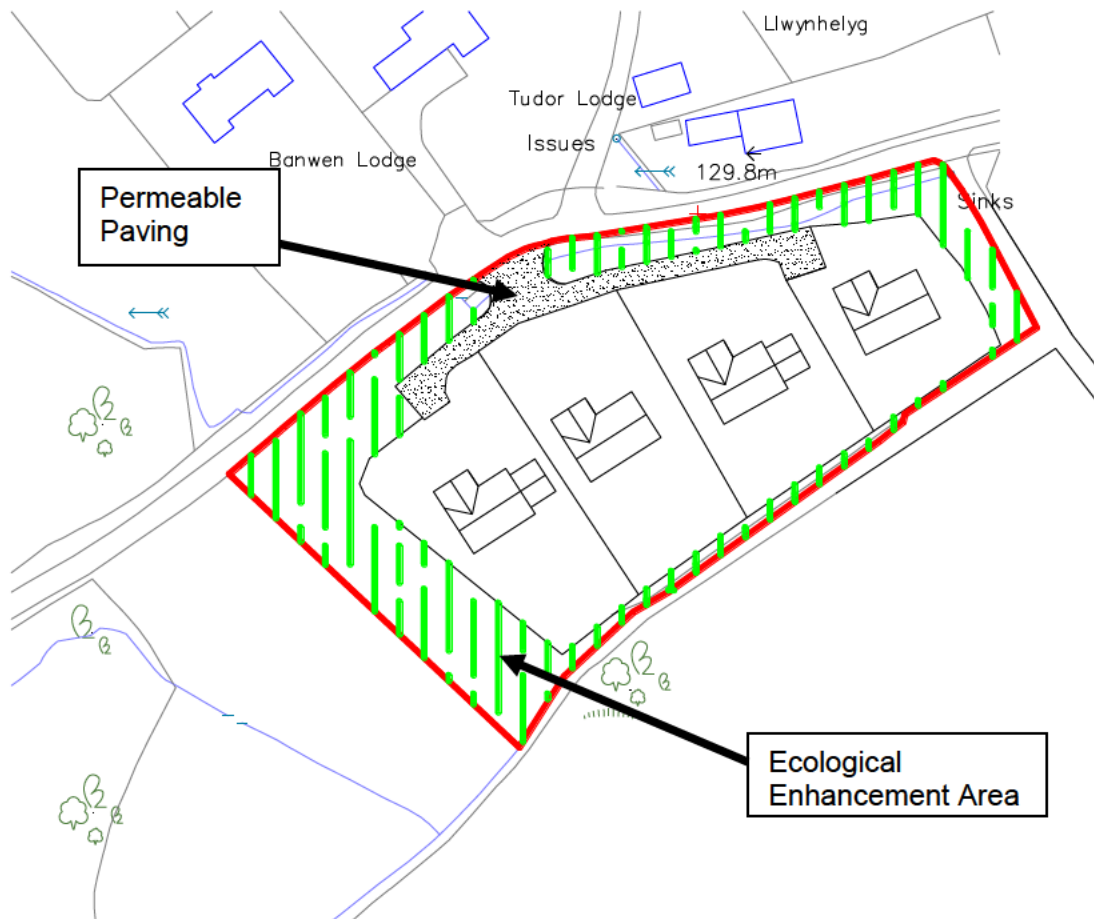


Figure 2.5 – Proposed Development

### Topography

Lidar data indicates that the site falls from west to east with a low spot on the north eastern corner (see Figure 2.6). Site levels range between 126.8m AOD and 132.2m AOD.

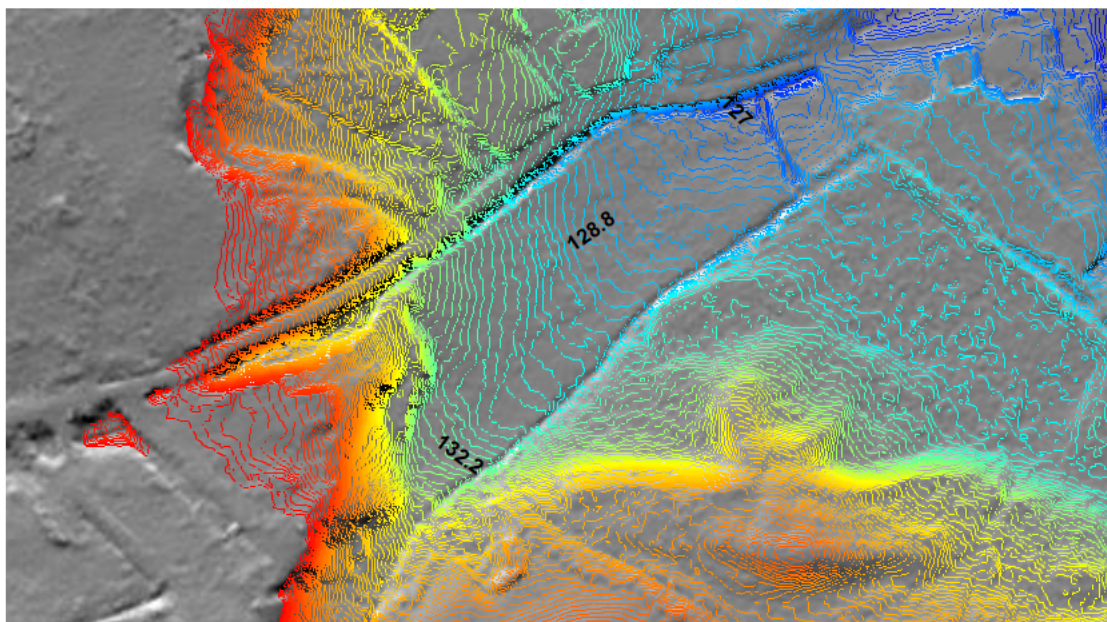


Figure 2.6 – Lidar Data for the Site



### 3 FLOOD RISK

Flooding can occur from several sources, some of which are considered in this section.

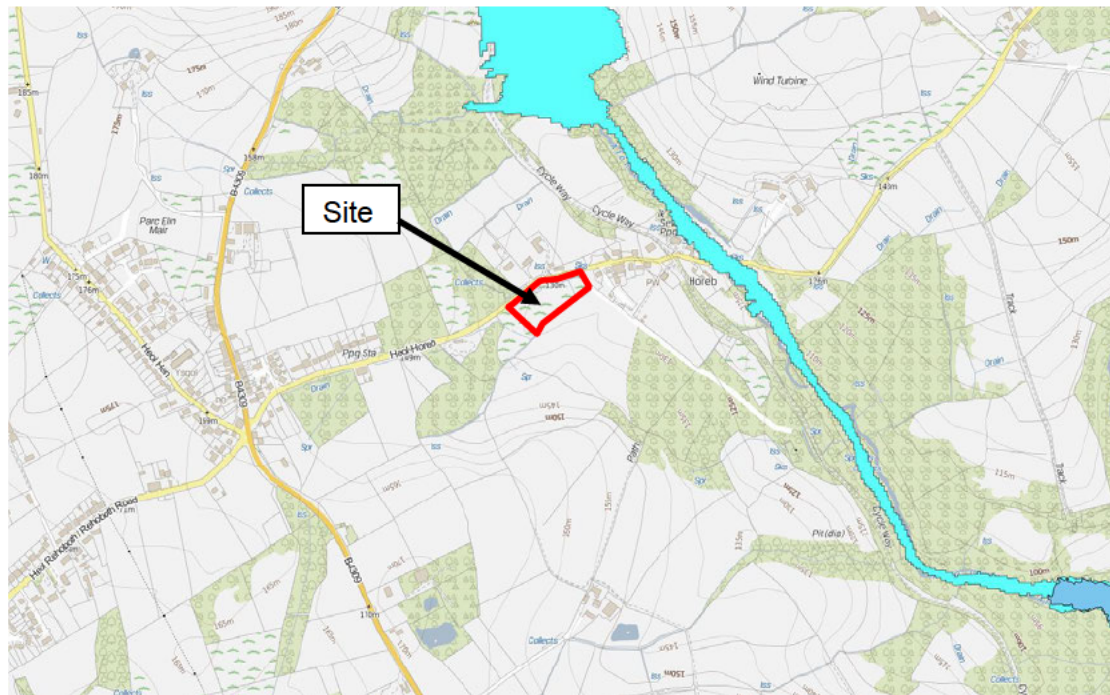


Figure 3.1- NRW Flood Map of the Area

#### 3.1 Fluvial

A flood map (see Figure 3.1), obtained from Natural Resources Wales, indicates that the site is expected to be flood free during both the 1 in 100 and the 1 in 1000 year fluvial events.

#### 3.2 Tidal

The development is not considered to be at risk from tidal inundation.

#### 3.3 Surface Water

NRW surface water maps suggests that most of the site is at risk from surface water flooding although a significant part of it, other than a central band, is of a low risk (less than 1 in 30 year return period - see Figure 3.2). The depth of flooding depends on the return period with the sections at a high risk generally having a depth of less than 150mm (see Figure 3.3) while during a medium risk the depth could be up to 300mm and 500mm in the north eastern corner (see Figure 3.4). There is also a low risk that the flood depths could reach up to 500 across the central belt (see Figure 3.5). It is noted that part of the main water courses, adjacent to the site, are expected to be flood free on the depth maps which questions the assumed conveyance of the ditches in the model.

The water mainly flows from the village of Five Roads, along with an area to the south, reaching the site mainly via a ditch running parallel with the road and also a ditch that runs parallel with the sites south eastern boundary this latter ditch crosses to the watercourse adjacent to the road on the north eastern side of the site . There is also a ditch that crosses between the two main water courses upstream of the site. As can be seen on Figure 3.6 water can also flow over land towards the site, approaching along the site's south western boundary.

The ditch adjacent to the road discharges, via a trash screen, into a culvert located on the northern corner of the site. Water that fails to be accommodated by the culvert flows onto the road placing the properties downstream of the site at risk.

The flood hazard on the site is generally considered to be low although the area near the trash screen considered to be a danger to most (see Figure 3.7).

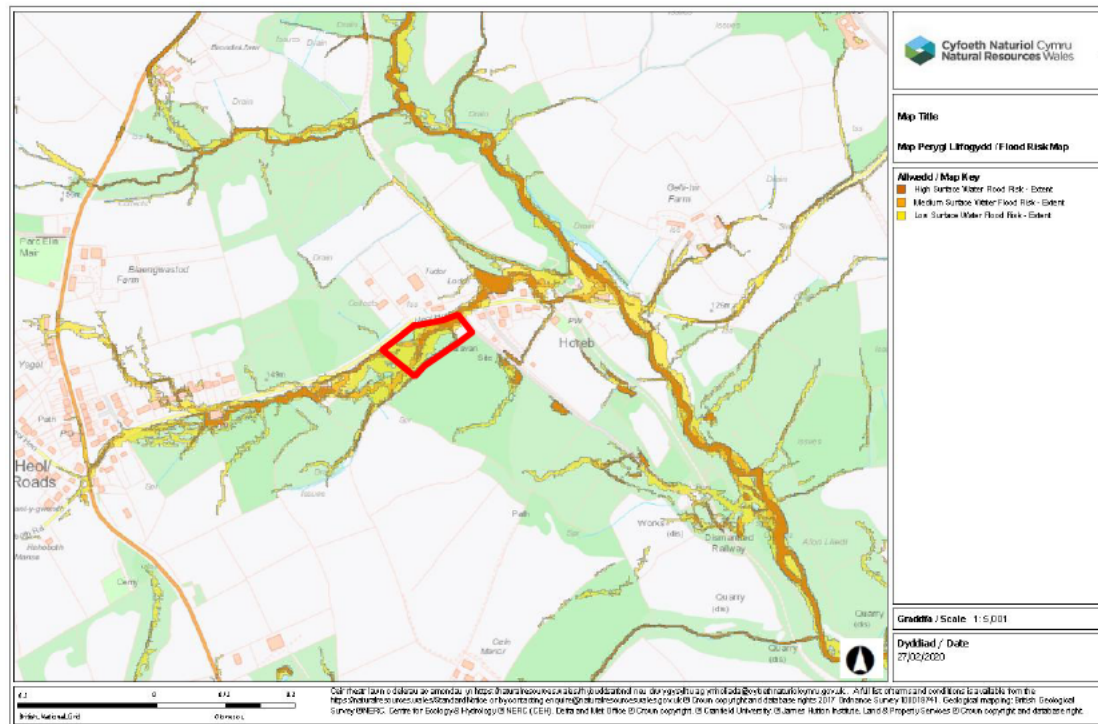


Figure 3.2 – Extent of Surface Water Flooding

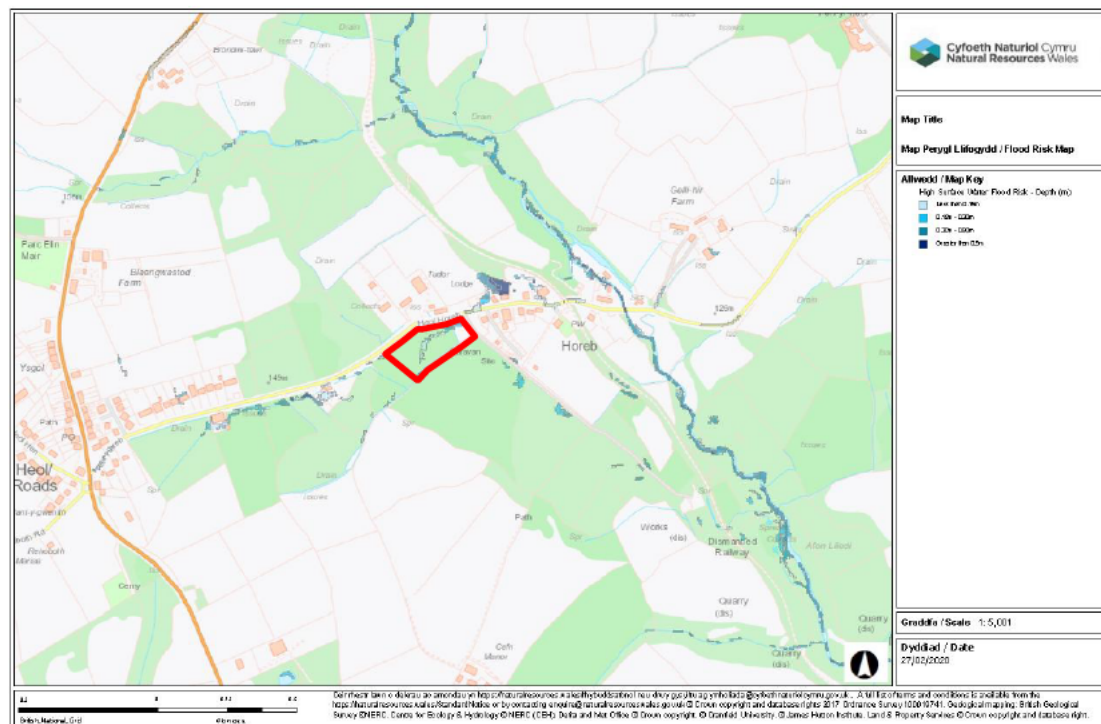
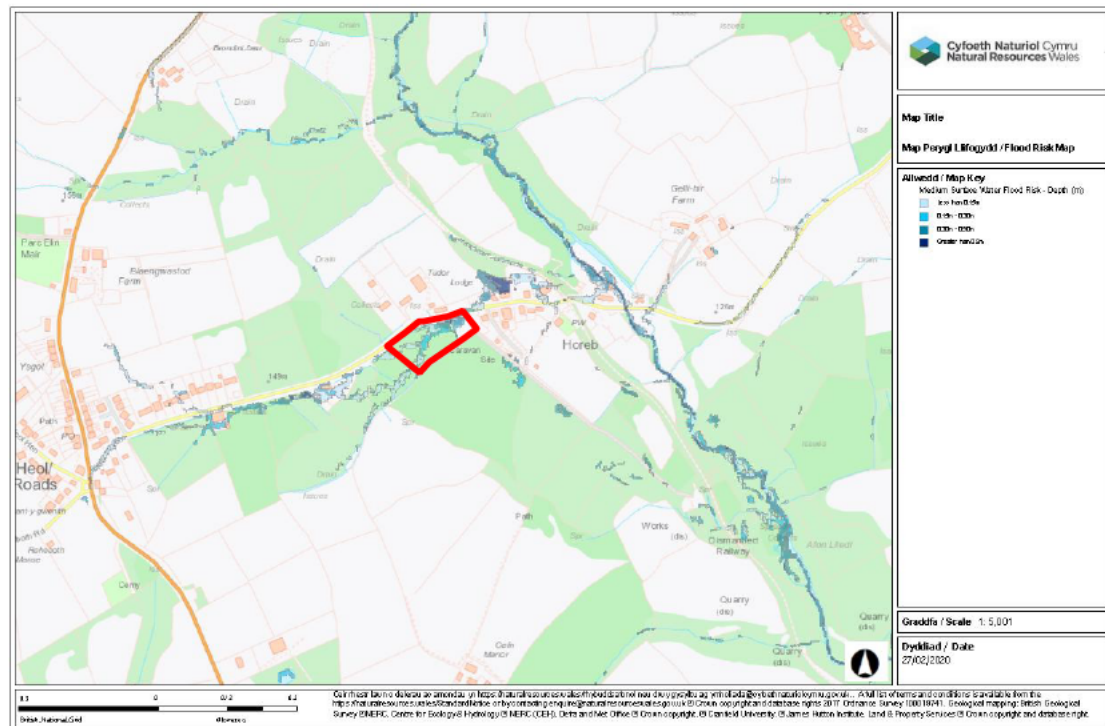


Figure 3.3 – Surface Water High Risk Flooding - Depth









### 3.5 Sustainable Drainage

In developing the site, measures (via a sustainable drainage system) will need to be incorporated into the design to ensure that the rainfall runoff rate does not exceed the greenfield 1 in 1 year event even during the 1 in 100 year storm even with a 40% increase to account for climate change. The sustainable drainage system will need to adhere to the requirements of the Welsh Government Standards and the SUDS manual.

### 3.6 Reservoir Failure

The site is not considered to be at risk from reservoir failure.

### 3.7 Ground Water

The superficial geology for the area consist of Diamicton from Devensian Till overlying a bedrock geology of Mudstone, Siltstone and Sandstone of the Llynfi Measure (see Figure 3.8 and 3.9). When taking the terrain into account the risk of groundwater flooding is considered to be comparatively low.

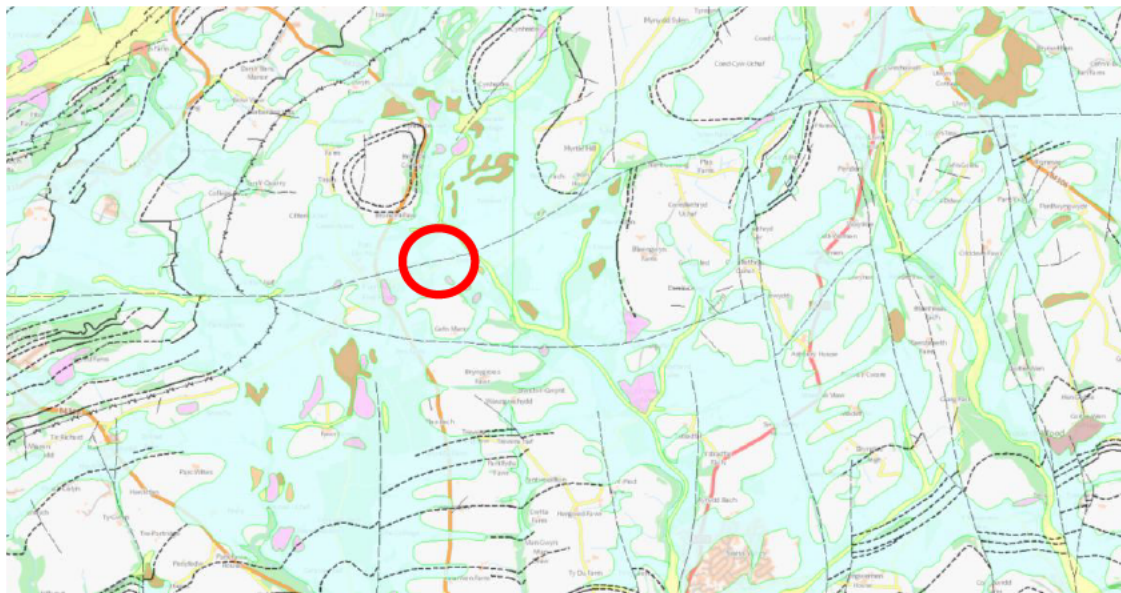


Figure 3.8 – Superficial Geology

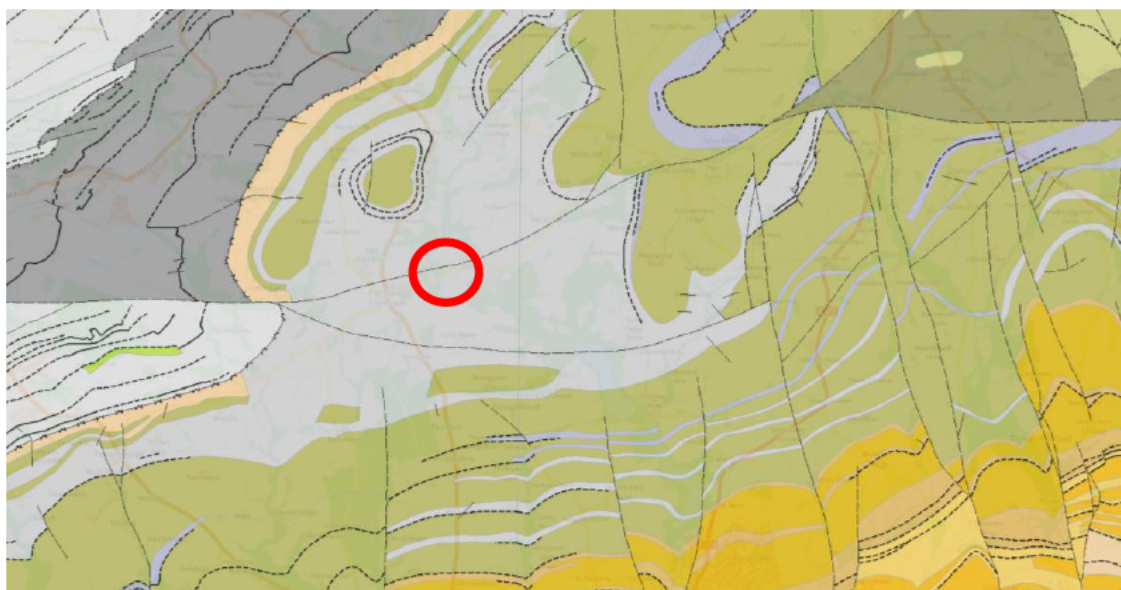


Figure 3.9 – Bedrock Geology



## 4 DISCUSSION

As shown in Section 3 the site is not considered to be at risk from fluvial, tidal, ground water flooding or from reservoir failure. At present there is potential that the site could be at risk from surface water flooding although the conveyance capacity of the adjacent watercourses might be underestimated.

As part of the scheme, however, it is proposed to include measures that will enhance biodiversity of the area, improve the quality of the water in the watercourses, reduce the peak flow running to the culvert on the north west corner of the site and reduce the risk of flooding to adjacent properties while ensuring the development remains flood free even during a 1 in 1000 year event.

The proposed measures include (see Figure 4.1):

- 1) designing the access road bridge to accommodate the Q1000 flow;
- 2) lowering the ground levels on the upstream end of the site to provide attenuation (not for surface water from the houses) with a controlled discharge rate;
- 3) planting trees, shrubs and other native plants around the attenuation area;
- 4) widening the watercourses on one side some 200mm above the bed level (see Figure 4.2);
- 5) create minor dams in the watercourses to reduce the conveyance rate and provide attenuation;
- 6) plant grasses on the widened area along with the occasional shrub to provide a filter mechanism;
- 7) lowering the ground levels on the downstream end of the site to provide attenuation (not for surface water from the houses) with a controlled discharge rate.

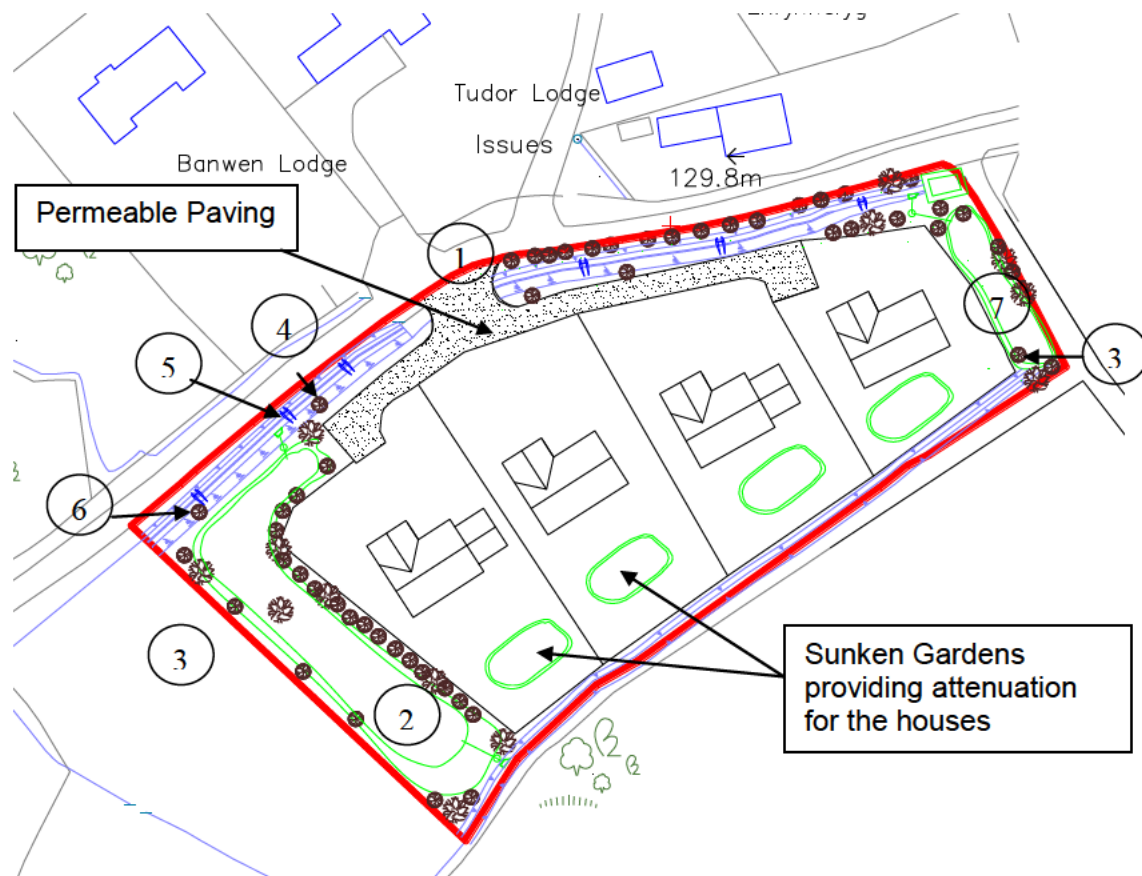
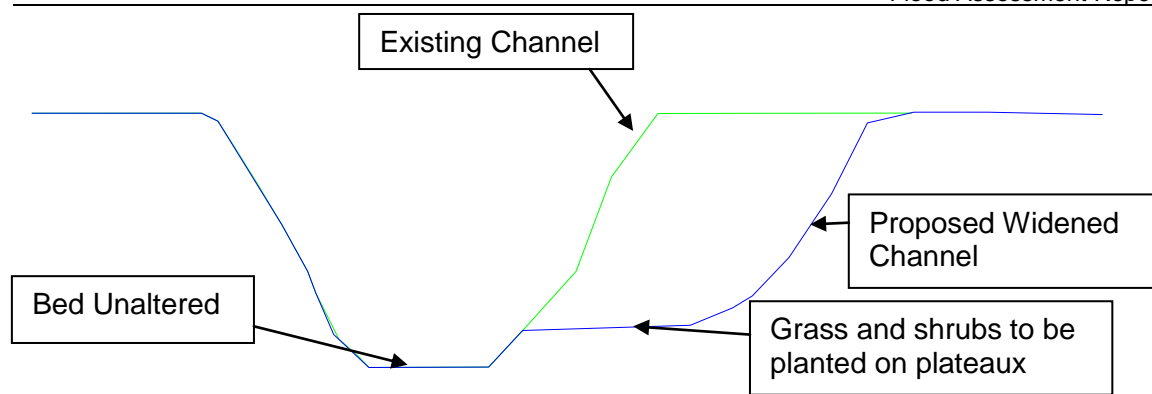


Figure 4.1 – Proposed Ecological and Flood Prevention Measures



**Figure 4.2 – Typical Cross Section Through Widened Watercourse**

## **5 CONCLUSION**

It is proposed to develop four 4 bedroom houses on land off Horeb Road, Five Roads. While the site lies within Zone A, in accordance with TAN 15, and is not considered to be at risk of fluvial flooding, surface water maps indicates that it may be at risk and hence a flood assessment is required to consider the risk and possible mitigation measures.

The surface water flood maps would indicate that there is a low risk of flooding over most of the site although the depth and hazard is generally expected to be low. The main risk of flooding would occur downstream of the site with water failing to drain into a culvert and instead flowing onto the road and subsequently towards the houses lower down than the site. The development offers a unique opportunity to reduce this risk while also providing benefits in terms of biodiversity and improving the water quality. The proposed plots are also expected to remain flood free for the considered events.

## Appendix E

### **Waun Wylt Pub Support Letter**



Monday 3<sup>rd</sup> April, 2023

Dear Mr Bowler,

With regards to your proposed submission to the LDP plan, we would like to offer our support of your site and make the following comments;

1. As the owners and operators of the Waun Wylt in Horeb, an increased number of houses in the immediate settlement would be a huge boost for us. We would welcome new patrons to help sustain our business.
2. We wish to build in the village to stay close to our business and live local. If there was an opportunity to purchase one of the self build plots then we would like to take up this opportunity as there are no suitable self build plots available nearby.
4. From what we understand, the council do not wish to allow more housing so as to not merge the village of Five Roads with Horeb, however, from the plans you have provided, it shows a natural rounding off of the settlement by building opposite the new final property up to the end of the Horeb sign. This would give the village a lovely feel as there would be a definitive end of the settlement.

Kind Regards,

Michelle Swift and Liam Smith