

Planning Statement

Residential Development

at
Land adjacent to Llaindelyn Road
St Clears
Carmarthenshire
SA33 4BB

For Owain Ennis
Anne Birt
Hugh Booth Mellter-Haley

April 2023



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1 General Description

- 1.1 This LDP Representation relates to the potential inclusion of a new site allocation for residential development in the Carmarthenshire Revised Local Development Plan 2018 – 2033.

2 LDP Representation

- 2.1 The statement has been prepared by Ceri Davies BA Hons, Dip UP, MRTPI, (Director of Ceri Davies Planning Ltd). The statement is based on information provided by the client and other consultants. All stated dimensions and distances are approximates and based on the best information available at the time. Please refer to the submission plans for detailed information.

- 2.2 The LDP Representation details include:

- 2nd Deposit Revised LDP Representation Form
- Integrated Sustainability Appraisal
- Location & Site Plans
- Planning Statement

3 Client Details

- 3.1 The clients are Owain Ennis of [REDACTED]; Anne Birt of [REDACTED]; Hugh Booth Meller-Haley of [REDACTED]

4 The Site

- 4.1 The site is an irregular shaped piece of land forming part of three separate field enclosure on the outskirts of St Clears. The fields in question are currently used for grazing and keeping of horses. The fields front onto Heol Llaindelyn and lie north-west of St Clears Roundabout.

- 4.2 Access to the site would be gained directly off Heol Llaindelyn, which comes off the A477 Trunk Road, via the Old Tenby Road. The site is bounded by mature hedgerows along its southern and eastern boundaries.
- 4.3 The site lies just north of a grouping of dwellings at the western end of St Clears. There is a residential dwelling directly opposite and a small cluster of dwellings at the end of Heol Llaindelyn. The location of the site and its proximity to the settlement of St Clears is illustrated on the map extract below (Figure i).

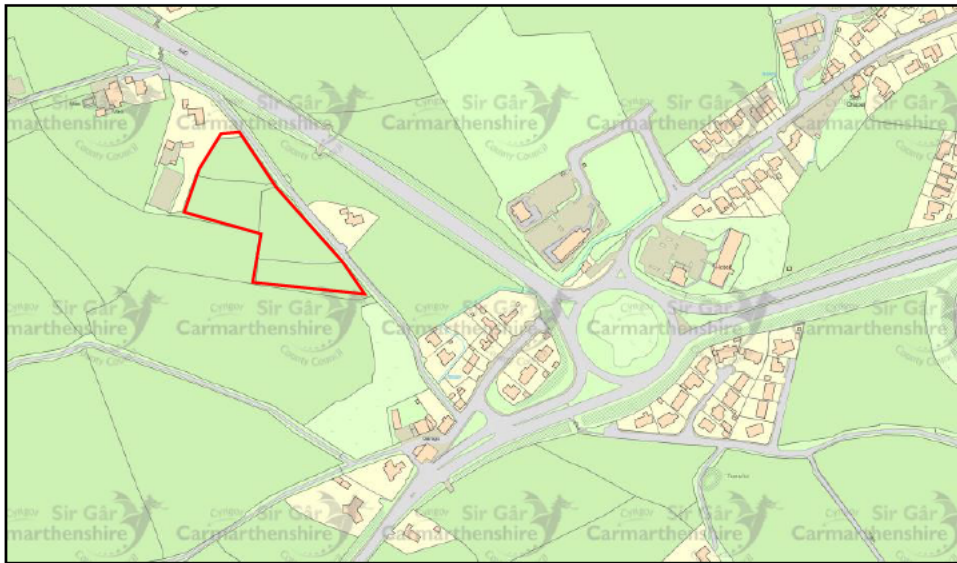


Figure i – Location Map

- 4.3 Whilst the site currently occupies an open countryside location, it lies in close proximity to a predominantly residential area within the settlement of St Clears. The proximity of the site to the settlement is shown on the aerial photograph below (Figure ii).



Figure ii – Aerial Photograph

- 4.4 Vehicular access into the site is currently gained via the existing field entrances which come directly off the adjacent public highway.

5 The Development

- 5.1 The aim of this proposal would be to develop the site for residential purposes. The site would be able to clearly accommodate 5+ plots, as such would be an additional housing allocation that could potentially contribute towards the future housing needs for St Clears.
- 5.2 The plan extract below (Figure iii) illustrates the scale of the site.



6 Policy Context

- 6.1 A review of the planning policy context associated with the site and the proposed development (at national and local level) is provided within this section of the Statement.

National Planning Policy

6.2 Well-Being of Future Generations (Wales) Act (2015)

- 6.2.1 The Act places a duty upon public bodies to produce well-being objectives that contribute to achieving a set of overarching well-being goals:

- A Prosperous Wales;
- A Resilient Wales;
- A Healthier Wales;
- A More Equal Wales;
- A Wales of Cohesive Communities;
- A Wales of Vibrant Culture and Thriving Welsh Language; and
- A Globally Responsible Wales.

6.2.2 Each public body is then required to take reasonable steps to meet their objectives in the context of the principle of sustainable development and whilst following a set of five ways of working.

6.2.3 The 'Resilient Wales' and 'Healthier Wales' goals are the key goals that open space and greenspace, as part of the planning process will contribute towards delivering.

6.3 Planning Policy Wales : Edition 11 (February 2021)

6.3.1 Planning Policy Wales (PPW) forms the overarching national planning policy document for Wales and sets out the land use planning policies of the Welsh Government. It is supplemented by a suite 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 main objective of PPW is to promote place-making and sustainable forms of development.

6.3.2 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. PPW and National Development Framework (NDF)

set out how the planning system at a national. Regional and local level can assist in delivering these requirements through strategic Development Plans(SDPs) and Local development Plans (LDPs).

- 6.3.3 There are a number of key planning principles indicated within Planning Policy Wales (PPW) to achieve the right development in the right place.
- 6.3.4 Paragraph 1.18 emphasises that the legislation secures a presumption in favour of sustainable development in accordance with the development plan, unless material considerations indicate otherwise. The principles of sustainable development are defined in the Well-being of Future Generations Act.
- 6.3.5 Paragraph 1.22 of PPW states that up-to-date development plans are the basis of the planning system and that these set the context for rational and consistent decision making, where they have been prepared in accordance with up to date national planning policies.
- 6.3.6 These key planning principles are set out with a view to achieve a number of national sustainable placemaking outcomes, as explained in paragraphs 2.15-2.20 and outlined in Figure 4. The national sustainable placemaking outcomes are:

People and Places: Achieving Well-being Through Placemaking

- Growing our economy in a sustainable manner
 - Making best use of resources
 - Maximising environmental protection and limiting environmental impact
 - Creating and sustaining communities
 - Facilitating accessible and healthy environments
- 6.3.7 Paragraph 2.17 states “In responding to the key principles for the planning system, the creation of sustainable places and in recognition of the need to contribute to the well-being of future generations in Wales through placemaking, development plans and development proposals must seek to deliver development that address the national sustainable placemaking outcomes”.
- 6.3.8 Sustainable development forms a key consideration central to all policies contained within Planning Policy Wales (PPW). Paragraph 1.2 states: “The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable

development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Wellbeing of Future Generations (Wales) Act 2015 and other key legislation.”

6.3.9 Paragraph 2.27 sets out how to assess the sustainable benefits of development: “Planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle. There may be occasions when one benefit of a development proposal or site allocation outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals.”

6.3.10 Paragraph 2.17 states that “in responding to the key principles for the planning system, the creation of sustainable places and in recognition of the need to contribute to the well-being of future generations in Wales through placemaking, development plans and development proposals must seek to deliver developments that address the national sustainable placemaking outcomes.”

6.4 Future Wales: The National Plan 2040

6.4.1 Future Wales – The National Plan 2040 is Wales’ national development framework which sets out the direction for development in Wales to 2040. It is a development plan that sets out a strategy for addressing key national priorities including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and wellbeing of our communities.

6.4.2 The spatial strategy is a guiding framework which sets out the key national policies that will guide and encourage development which supports sustainable growth in both urban and rural areas across Wales.

Policy 1 – Where Wales will grow

6.4.3 Policy 1 is the overarching policy which sets out where sustainable growth will take place in Wales. Three National Growth Areas have

been established where there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:

- Cardiff, Newport and the Valleys;
- Swansea Bay and Llanelli; and
- Wrexham and Deeside.

6.3.4 These National Growth Areas are complemented by Regional Growth Areas, which will grow, develop and offer a variety of public and commercial services at regional scale. There are Regional Growth Areas in three regions:

- The South West;
- Mid Wales; and
- The North.

6.3.5 In addition to the above growth areas, there are a mix of smaller towns and villages and large areas of countryside. The policy states that 'development in towns and villages in rural areas will support local aspirations and need, complementing rather than competing with efforts to grow our cities and towns.'

Local Planning Policy

6.4 The proximity of the site to the defined settlement development limits for St Clears in the current Local Development Plan (LDP) is illustrated in the map extract below, Figure (iv).

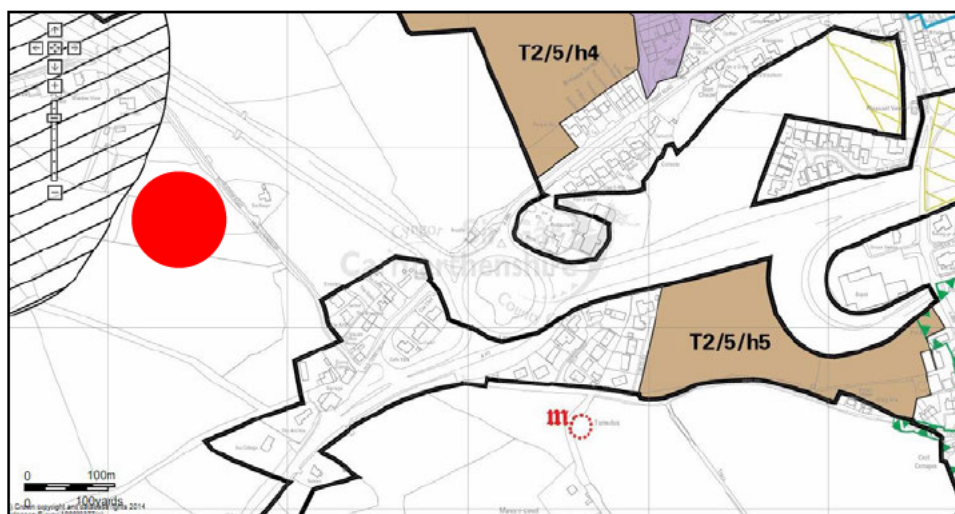
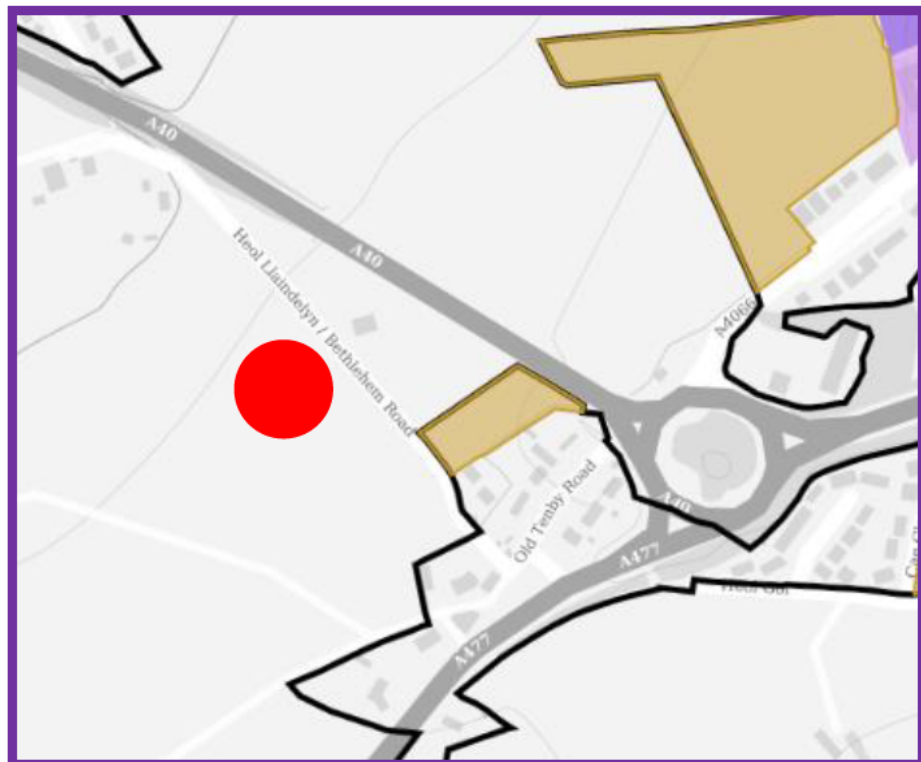
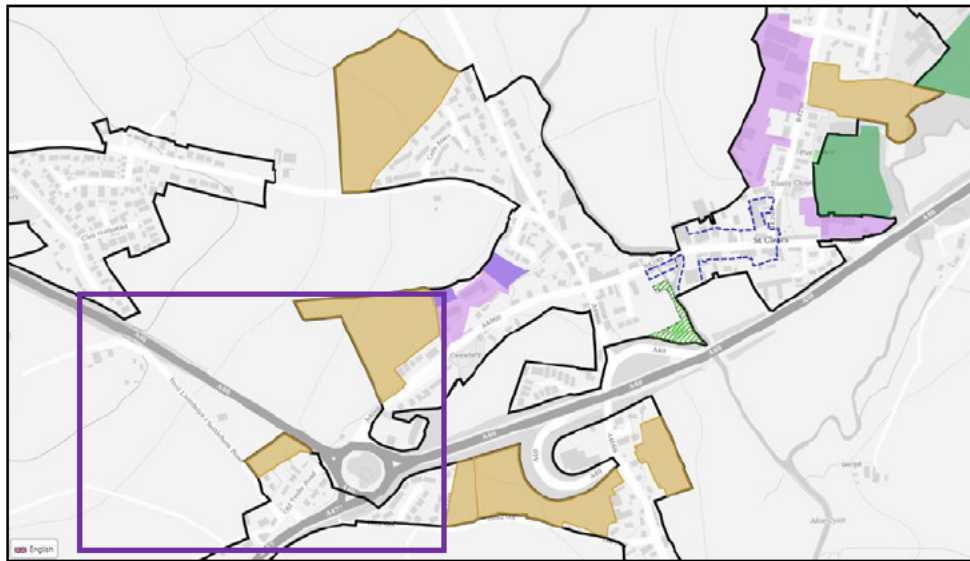


Figure iv – Current LDP Proposal Map

- 6.5 The proximity of the site to the defined settlement development limits for St Clears in the 2nd Deposit Revised Carmarthenshire Local Development Plan (LDP) is illustrated in the map extract below, Figure (v).



7 Detailed Consideration

- 7.1 As highlighted in the Integrated Sustainability Appraisal (ISA), it is asserted that the site is deemed compatible with Strategic Policy SP3 of the revised LDP which seeks to ensure the provision of growth and development is directed to sustainable locations in accordance with the spatial framework.
- 7.2 Given its proximity to St Clears, which is identified as a Cluster 6, Tier 2 – Service Centre within the Settlement Framework, ISA Objective 1 (Sustainable Development) is satisfied in this instance.
- 7.3 As illustrated on the plan below (Figure vi), the site represents a sustainable location given its close proximity to St Clears.

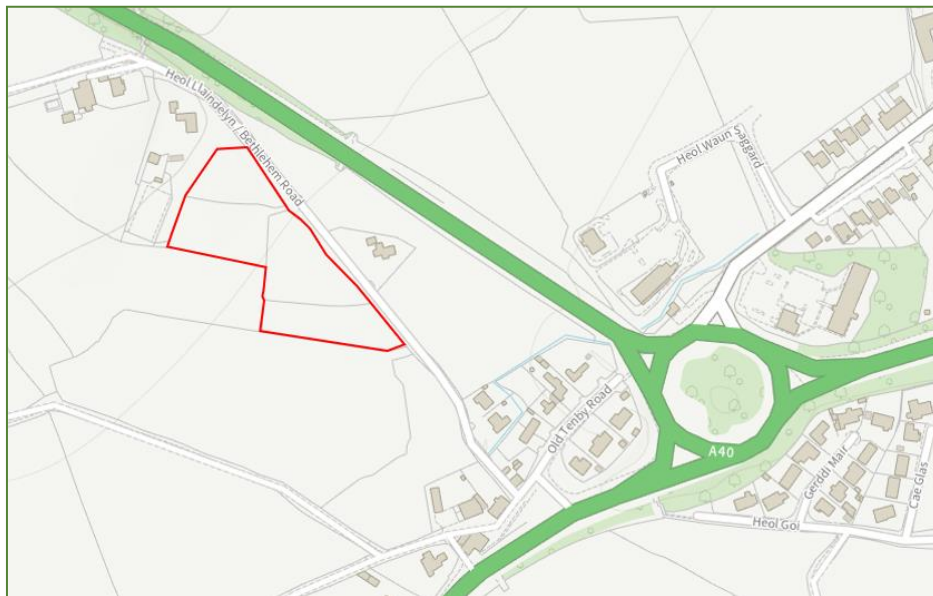


Figure vi – Location Plan

- 7.4 The site clearly relates well to the settlement of St Clears which is classed as a Service Centre in Strategic Policy SP3 of the LDP.
- 7.5 Natural Resources Wales Development Advice Maps indicate that the site does not lie within a Zone C1 or C2 flood area as defined by the development advice maps referred to in Technical Advice Note 15, Development and Flood Risk (TAN 15), as illustrated in the DAM extract below (Figure vii).
- 7.6 TAN15 states that new development should be directed away from Zone C and towards zone A, otherwise to zone B, where river or

coastal flooding will be less of an issue. The site is not considered to be at risk of flooding during at least the 1 in 1000 year event.

- 7.7 The development advice maps supplemented by sediment data, held by the British Geological Survey (BGS), of historical flooding. The maps adopt a precautionary principle and are based on the best known information available at the time. It is noted that the NRW flood maps show the site as being flood free during the Q100 event and Q1000 event.

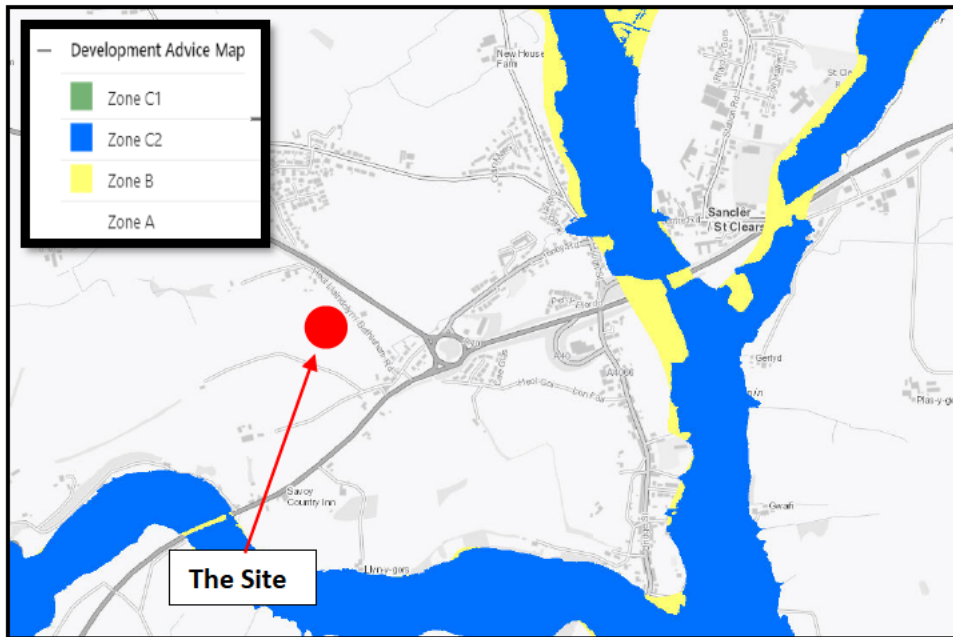


Figure vii – DAM Map

- 7.8 The Flood Map for Planning Wales also indicates that the site is not at risk from localised or surface water flooding; this is illustrated on the FMfP extract below (Figure viii).

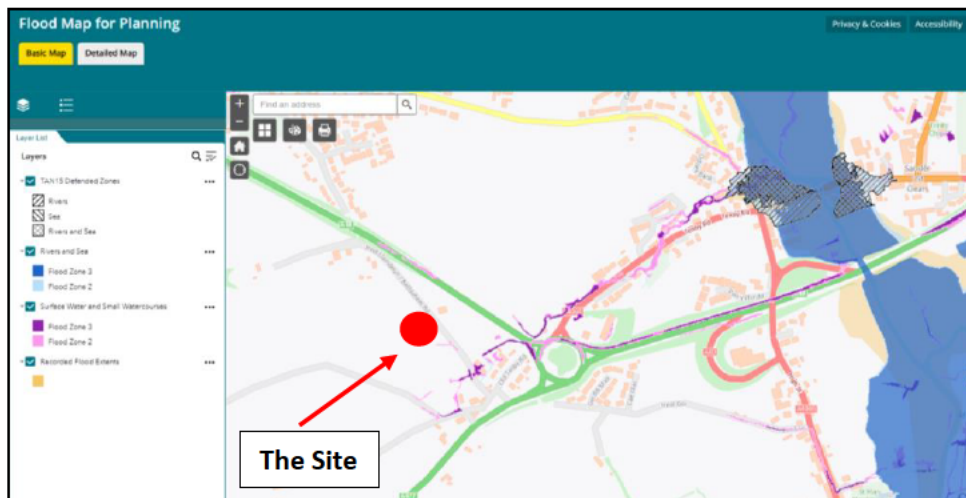


Figure viii - FMfP

- 7.9 The Flood Risk Map demonstrates that the site falls outside of Flood Zone 2 and Flood Zone 3, as such falls within and an area deemed at low flood risk from rivers. The site will not be affected during the 1 in 1000 fluvial (Q1000 event or 0.1% event) and would also be flood free during the 1 in 100 (Q100) flood event.
- 7.10 The site does not fall within a C1 or C2 flood risk zone as delineated by TAN15 DAM flood maps. Neither does it fall within a Flood Zone 2 or Flood Zone 3 as delineated by FMfP (Flood Map for Planning Wales). As such, ISA Objective 4 (Climatic Factors) and ISA Objective 5 (Water) are both satisfied in this instance.
- 7.11 The site is not located within or immediately any of the following designated sites:
- Sites of Special Scientific Interest (SSSI)
 - Special Areas of Conservation (SAC)
 - Special Protection Areas (SPA)
 - National Nature Reserves (NNR)
 - Local Nature Reserves (LNR)
 - Common Land or registered village green
- As such, ISA Objective 2 (Biodiversity) is satisfied in this instance.
- 7.12 The site is not located within or immediately adjacent to any Scheduled Monuments. As such, ISA Objective 8 (Cultural Heritage and Historic Environment) is satisfied in this instance.
- 7.13 The proposed housing allocation is deemed appropriate at this location in that it would not impact on any core planning principles. The development would be sited immediately adjacent and opposite existing residential dwellings and also in close proximity to the edge of the existing settlement. The map extract below (Figure ix) illustrates the existing pattern of development at this part of the village, and the proximity of the site to the existing built form



- 7.14 Clearly the development would not lead to unacceptable ribbon development; it would not be deemed tandem development. It would not lead to unacceptable coalescence of settlements and given its siting between existing properties it would be classed as a form of infill, as such, cannot be described as unacceptable sporadic development or an unacceptable extension to the settlement.
- 7.15 In addition it would not result in the loss of areas of public open space and formal recreational land. Given the aforementioned, it is asserted that the development would not be contrary to general planning principles.
- 7.16 The development would sit comfortably at this location without having any detrimental impact whatsoever on the character or setting of the settlement. Furthermore, the development would not have any detrimental impact on any features of the settlement such as landscapes, townscapes or buildings of importance as a result of its scale, density and prominence. As such, ISA Objective 8 (Cultural Heritage and Historic Environment) along with ISA Objective 9 (Landscape) are both satisfied in this instance.
- 7.17 The proposal will not involve the re-use of suitable previously developed land, hence, it is acknowledged that the site is a greenfield site, as such, ISA Objective 7 (Soil) is not entirely satisfied in this instance. The site has a road frontage boundary that fronts onto an Heol Llaindelyn. As such, the site is readily accessible from the existing public highway. The site has a number of existing and established field entrances with adequate visibility splays, which allows direct access into the site.
- 7.18 Heol Llaindelyn is not a through-road, and is a relatively quiet road which primarily serves 3-4 residential properties. Heol Llaindelyn does not access directly onto the A477 Trunk Road, but is accessed via the Old Tenby Road. The junction onto the A477 Trunk Road, also known as Tenby Road is served by adequate visibility splays.
- 7.19 The map below (Figure x) illustrates the number of crashes in the immediate vicinity of the site.

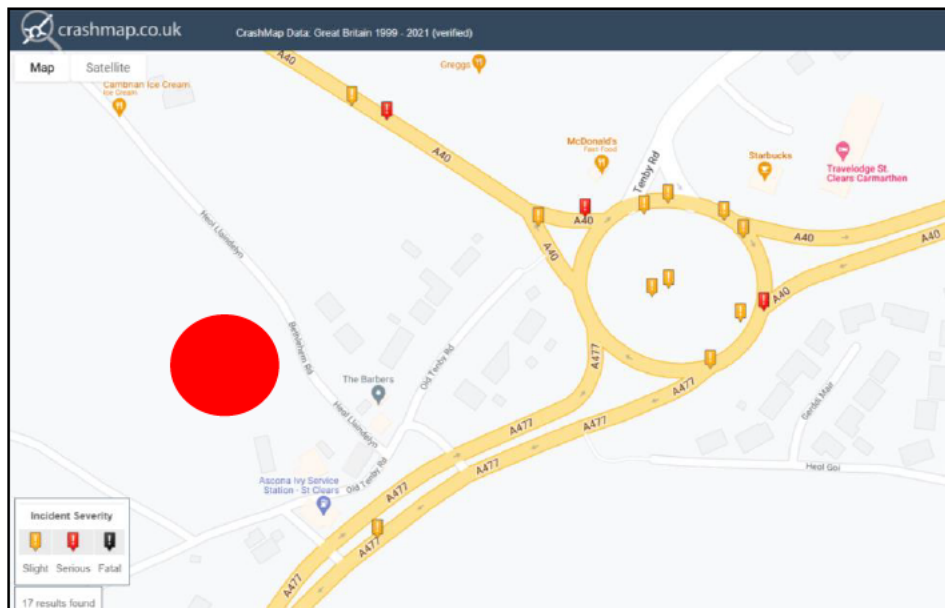


Figure x (Source:Crashmap.co.uk)

- 7.20 Data obtained from Crashmap.co.uk confirms that in the last 10 years, there have been no slight, serious or fatal crash incidents along Heol Llandelyn or the Old Tenby Road, and, only one slight accident on close to the A477 road junction. This would suggest that there are no highway issues relating to the site or the public road(s) which serve the site.
- 7.21 The site lies in close proximity to National Cycle Network Route 4, which is approximately ½ mile away. This is illustrated on the Sustrans National Cycle Network Map extract below (Figure xi).

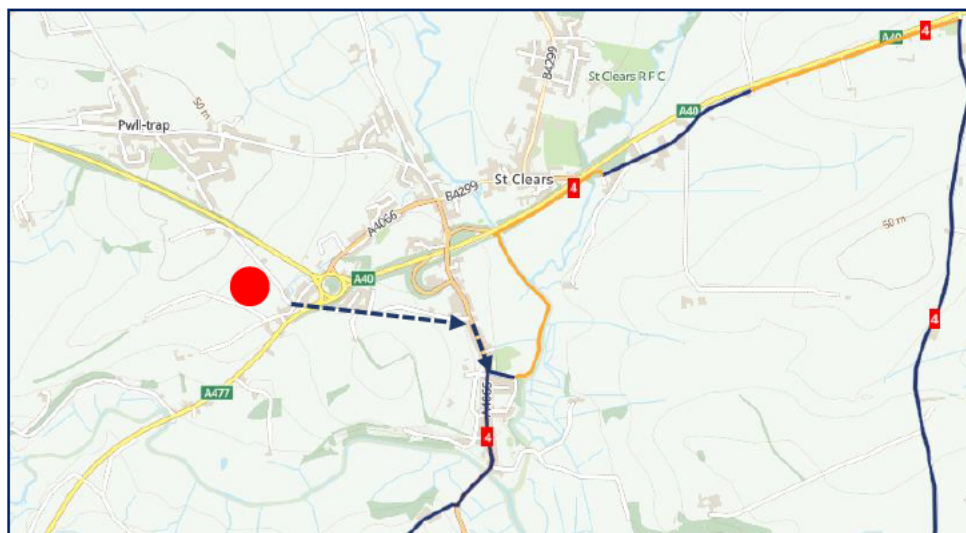


Figure xi (Source Sustrans)

7.22 In addition, the site would be very accessible to a number of footpaths as identified on the Active Travel Network Map, annotated in green on the plan extract below (Figure xii).

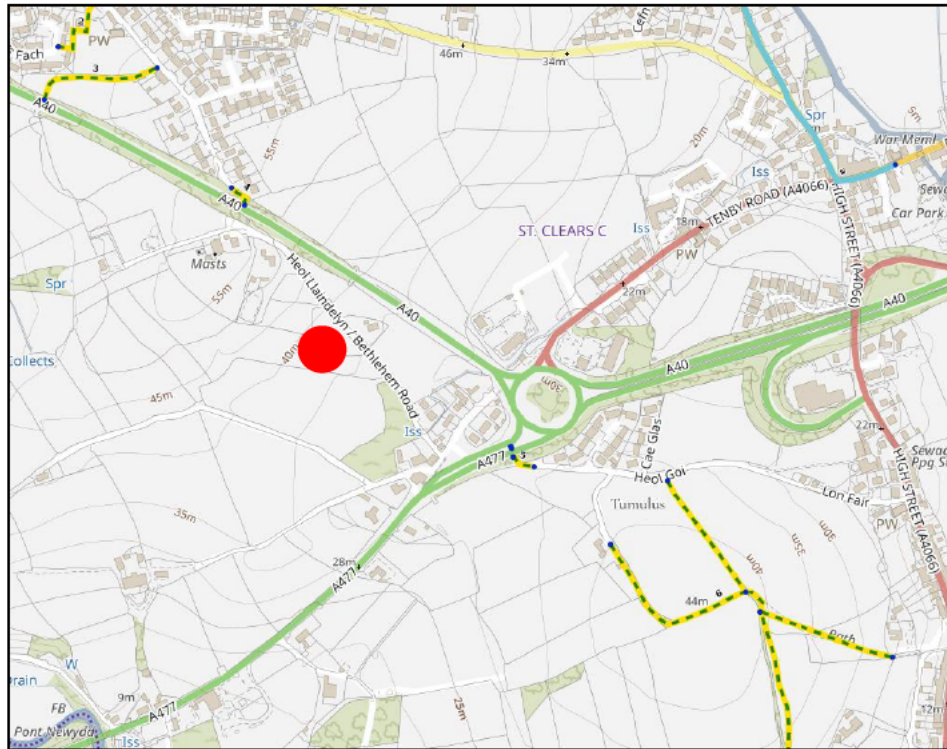


Figure xii – Source: Active Travel Network Map

7.23 The site is readily accessible to a local bus services with the nearest bus stop less than a 5 minute walk away.

7.24 It is considered the site has suitable access to public transport as well as identified active travel routes, as such, satisfies the following ISA Objectives; ISA 3 (Air Quality), ISA 4 (Climatic Factors), ISA 6 (Material Assets), ISA 12 (Health & Well-being), ISA 13 (Education s& Skills), ISA 15 (Social Fabric).

7.25 Given its location within a field enclosure, the site lies immediately adjacent to an accessible green space. In addition, the site is very accessible to a number of identified play areas in the settlement of St Clears. The nearest play space identified on the LDP Proposals Map is approximately 600 metres away which represents a reasonable walking distance. As such, it is considered the site satisfies ISA Objective 12 (Health & Well-being) and ISA Objective 15 (Social Fabric) .

7.26 The site is within a reasonable walking distance of the service centre which has a wide range of employment/retail provisions, services and facilities. Whilst the site clearly occupies a rural location, it

represents a very sustainable location given its close proximity to the service centre.

- 7.27 It is considered the site is within a reasonable distance of a number of employment and retail provisions as well as other local services and facilities, given its proximity to St Clears. As such, the site satisfies the following ISA Objectives; ISA 6 (Material Assets), ISA 10 (Population), ISA 14 (Economy), ISA 15 (Social Fabric).
- 7.28 The site represents a sustainable location in terms of its proximity to nearby nursery schools. The site is also within a reasonable distance of Whitland Secondary School (7.5km) and St Clears Primary School (0.5km). As such, ISA Objective 13 (Education & Skills) is satisfied in this instance.
- 7.29 The site is not located within or adjacent to a mineral buffer zone, as such, ISA Objective 6 (Material Assets) is satisfied in this instance. The site is partly located within a Mineral Safeguarding Area, as such, ISA Objective 6 (Material Assets) is not entirely satisfied in this instance. The site is not located within or immediately adjacent to an a Air Quality Management Area (AQMA), as such, ISA Objective 3 (Air Quality) is satisfied in this instance.
- 7.30 The site does not contain high carbon e.g. peatlands, as such, ISA Objective 7 (Soil) is satisfied in this instance. The site does not contain high quality agricultural land (grades 1,2 or 3A, as identified within the Agricultural Land Classification Maps). As such, ISA Objective 7 (Soil) is satisfied in this instance.
- 7.31 The site is not located within or immediately adjacent to any Regionally Important Geological or Geomorphological Sites. As such, ISA Objective 9 (Landscape) is satisfied in this instance.
- 7.32 The site is located within close proximity to a viable water connection and is also located within close proximity to other viable infrastructure requirements such as electricity and main sewer.
- 7.33 The site is not located within or adjacent to a phosphate sensitive SAC catchment. As such, the site satisfies the following ISA Objectives; ISA 2 (Biodiversity), ISA 5 (Water) & ISA 7 (Soil).
- 7.34 The site by virtue of its scale and location, would not have the potential to have a detrimental impact on the Welsh Language. As such, ISA Objective 11 (Welsh Language) is satisfied in this instance.

- 7.35 The traffic movements associated with the development proposal will be marginal and the development could be accommodated on the highway network and will not have a detrimental impact on the free flow of traffic due to the existing volumes of traffic using the local highway network. There are no access or transport constraints to prevent the development of the site for residential purposes.
- 7.36 It is asserted that owing to the nature of the development proposal i.e. residential, the development has due regard to the existing built form and also character and appearance of the surrounding area. Careful consideration has been given to the site selection to ensure the relationship between the proposed dwellings and existing development in close proximity is acceptable. It is considered that a housing site at this location would conform with the character and appearance of the immediate area in terms of siting and land use.
- 7.37 It is not disputed that the siting of residential dwellings at this location would introduce built form at an otherwise undeveloped site. However, the dwellings would not represent a prominent or conspicuous form of development. While the proposed development would inevitably change the character of the site itself, the proposed changes would not be to the extent that would result in an unacceptable impact on the surrounding landscape.
- 7.38 The development would not be readily visible from the wider area; the mature trees and vegetation along the site boundaries would, to a degree, mitigate any visual impact.
- 7.39 Given the aforementioned, it is considered that any resulting development would not be inappropriate or disproportionate in scale. It is on this basis that it is considered that the proposal would represent a sensitive form of development, commensurate with the existing built form, hence would not adversely affect the spatial character of the village.
- 7.40 The development would not have a significant impact on the amenity of adjacent land uses, properties, residents or the community. The impact on the amenity of nearby residents has been fully considered and duly discounted, particularly given the separation distance between the site and the nearest residential properties.
- 7.41 Overall, the proposed development would satisfy PPW's objective of achieving sustainable development both by ensuring that the

local community has access to sufficient housing and affordable options whilst also working to facilitate a modal shift to more sustainable methods of transport and reducing car borne journeys.

8 Summary and Conclusion

- 8.1 This Planning Statement has been completed on behalf of Owain Ennis, Anne Birt and Hugh Booth Meller-Haley and provides planning support for the inclusion of additional land in the revised Local Development Plan to accommodate potential residential development adjacent to Heol Llaindelyn, St Clears.
- 8.2 It has been established that the principle of residential development is compliant with both national and local policy and represents an acceptable form of development at this location. The development would assist with the housing land supply situation in the county.
- 8.3 While residential development at this location would inevitably change the character of the site itself, the proposed changes would not result in an unacceptable impact on the surrounding landscape nor would they have an adverse impact on the existing neighbouring development, highway network or local infrastructure.
- 8.4 In conclusion, it has been demonstrated that there are significant material considerations weighing in favour of the inclusion of this site for residential development in the upcoming revised local development plan.