

Carmarthen West

Planning Statement

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theurbanists

Prepared by: The Urbanists Ltd

Address: The Urbanists, Westgate House, 11 Womanby Street, Cardiff, CF10 1BR

On behalf of: Lovell Homes and Carmarthenshire County Council

Email: planning@theurbanists.net

Website: www.theurbanists.net

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1. Introduction and Background

1.1. Background

This Statement is prepared by the Urbanists for Lovell Homes and Carmarthenshire County Council. It is prepared in support of a detailed planning application to deliver 84 residential units at Carmarthen West. The land at Carmarthen West has been identified as a key strategic site within the Council's Housing Regeneration and Development Delivery Plan and will contribute towards the delivery of over 1,100 homes, a new school, and employment use across the county over the next five years.

The strategic allocation is included in both the adopted Local Development Plan and the emerging Revised Local Development Plan. Its delivery will help ensure the strategic allocation becomes a successful reality over the Revised Development Plan period. It is also positive for the Council's objective to utilise its land assets to provide local homes.

1.2. This Report

This document comprises the following;

- **Section two** describes the site in context and the surrounding area, including its planning history;
- **Section three** describes the development proposal in more detail, including how it has evolved;
- **Section four** describes the legislative and planning policy context relevant to the proposed development;
- **Section five** sets out the material considerations and provides an assessment of the proposals in planning policy terms;
- **Section six** provides a summary and some conclusions based on the above.

1.3. The Application

The planning application comprises the following documentation:

- Site location plan and existing site plan;
- Existing and proposed site levels, with supporting sections;
- Proposed site layout;
- Architectural details, including house-type elevations, floor plans, and street scenes;
- Hard landscape and soft landscape plans and details;
- Foul and surface water drainage details;
- Proposed lighting and utilities details;
- Design and Access Statement;
- Planning Statement;
- Energy Statement;
- Green Infrastructure Statement;
- Ecological Impact Assessment (including targeted species and habitat surveys underway);
- Arboriculture Impact Assessment;
- Transport Assessment;
- Phase 1 Ground Conditions Desktop Report;
- Archaeological Desk-Based Assessment; and
- Noise Assessment.

2. The Development Site

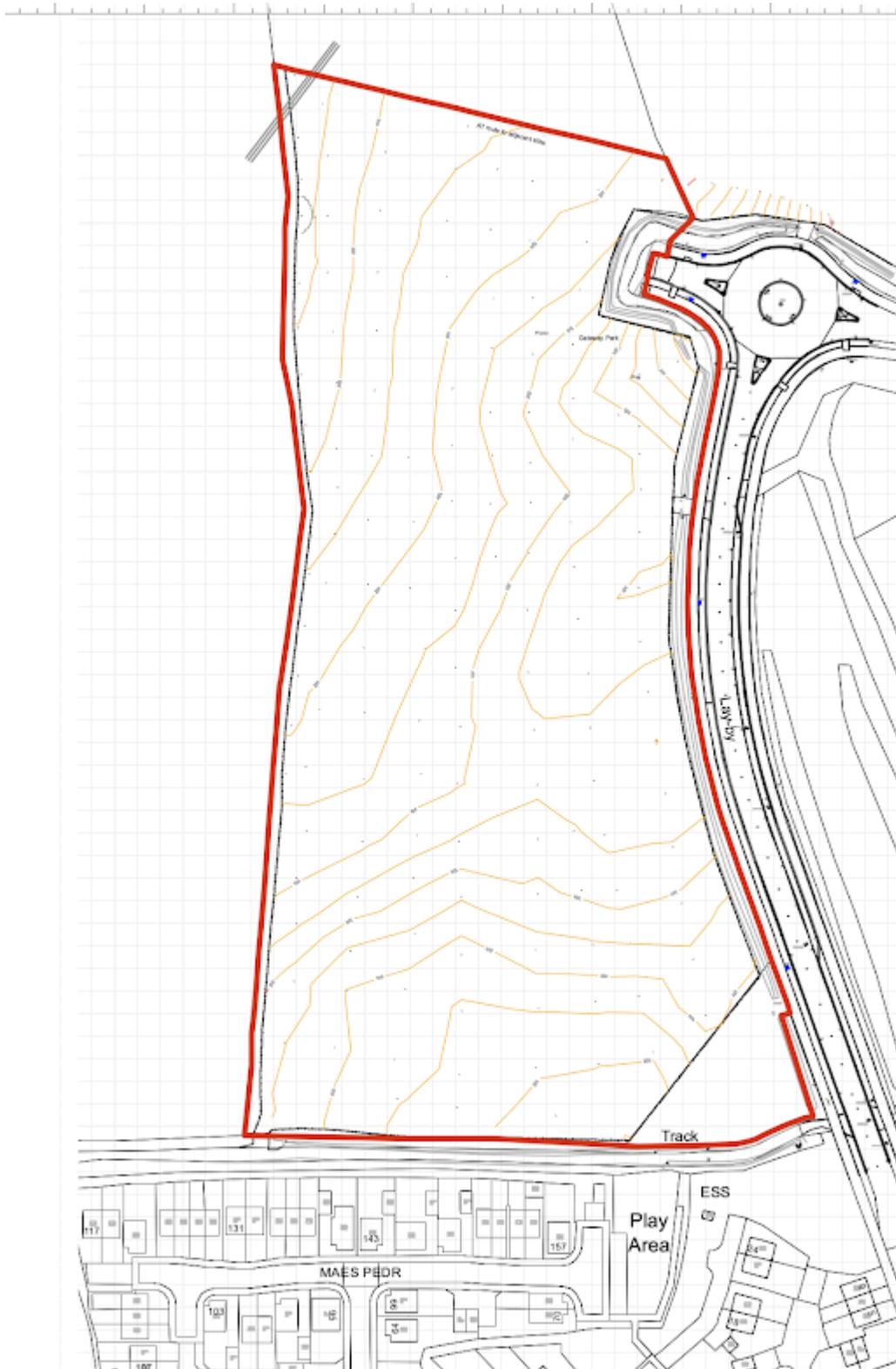
2.1. Site Location

The site is located on the western edge of Carmarthen, along the western boundary of Fford Pendre. It benefits from direct access to the new Carmarthen West Link Road with one established vehicular access point from Fford Pendre. The site therefore has excellent highway connections to the A48 and M4. The new link road provides direct access to key employment sites at S4C's headquarters (Yr Egin), St. David's Park, Hywel Dda Health Board's Hafan Derwen, and the University of Wales Trinity St David's Carmarthen Campus. The site also benefits from good access to the Carmarthen town centre.

Figure 1: Existing Site Location (©Google Earth)



Figure 2: Site Boundary Plan



2.2. Site Description

The development site comprises approximately 3.6 hectares of greenfield land. Classified as Grade 3a Agricultural Land, the site falls into the 'best and most versatile' category of the Agricultural Land Classification. However, the allocation in the LDP effectively negates this status.

The site is bound by hedgerows along its western boundary and the southern boundary, which also has mature tree planting. This creates a visual divide between the site and the new residential dwellings on Maes Pedr. The northern boundary is also vegetated, with hedgerow and shrub planting, but there is a break to facilitate access to the fields to the north. The eastern boundary is largely open and abuts Ffordd Pentre, although there are modest areas of scrub and scattered immature tree planting in this area.

The land north of the site and to the west of the site's southern extent are part of the wider strategic allocation and will be delivered as future phases. Early phases of the allocation have already been delivered to the south of the site and therefore already make up part of the landscape character of the area. The Maes Pedr development provides 114 dwellings, and development is underway to provide an additional 100 dwellings. Additional residential development is also underway north of the site, further up Ffordd Pendre with this development also contributing to the existing character of the area. In the strategic allocation masterplan, the land west of the site is not proposed for development and is presently an open agricultural field, although the large-scale Wynnstay agricultural plant is located west of the site and characterises views out from the site.

Figures 3 -4: Photos of The Site (©The Urbanists)



2.3. Planning History

This section sets out the planning history of relevance to the site and the proposed development. There are no planning history records on the development site itself, but it has been allocated under the LDP as part of allocation GA1/MU1. The site continues to be allocated in the Revised Local Development Plan 2018 - 2033, which is in the latter stages of examination, having already been subject to public hearings and Inspector review.

Figure 5: Illustrative Masterplan (©West Carmarthen Planning and Development Brief pg. 59).



The following key planning permissions have been granted in the area surrounding the site as part of the strategic allocation:

- W/23866: Construction of a two-lane single carriageway road 7.1m wide with 2m wide parking bays, 3m wide shared footway and cycleway on both sides of the route. including the construction of a 17m span bridge, large roundabouts at both the tie-in with the A40 (2010-10-19) - **Granted**.
- W/30286: Residential development for 110 dwellings (2015-06-03) - **Granted**.
- W/38572: Construction of 100 residential dwellings and associated works, including initial phase of Carmarthen West distributor road (2015-11-18) - **Granted**.

3. Development Proposal

The proposed development would deliver 84 (42 affordable and 42 open market) residential units over 3.6 hectares. In addition to the provision of housing and the very significant proportion of affordable housing, the development includes appropriate means of access and internal highway and pedestrian routes, extensive green infrastructure for open space and biodiversity net gain, and drainage infrastructure including SuDS. The development proposes a gateway area to the north, which includes play and picnic areas, contributing to the health and well-being of prospective occupants.

Figure 6: Proposed Landscape General Arrangement



4. Planning Policy Context

This section of the statement identifies the national and local planning context relevant to the proposed development.

4.1. National Legislation and Planning Policy

The key national legislation and planning policy that provides material context to the proposed development is as follows:

- Well-being of Future Generations (Wales) Act (2015);
- Environment (Wales) Act;
- Active Travel (Wales) Act;
- Planning Policy Wales (Ed. 12);
- Future Wales: The National Plan 2040; and
- Technical Advice Notes.

The Well-being of Future Generations Act is fundamental to the development proposals in Wales. The Future Generations Act defines Sustainable Development in Wales as: *“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.”* The well-being goals identified by the Act are; A Prosperous Wales; A Resilient Wales; A More Equal Wales; A Healthier Wales; A Wales of Cohesive Communities; A Wales of Vibrant Culture and Welsh Language; A Globally Responsible Wales. The Act also sets out five ways of working needed for public bodies to achieve the seven well-being goals. These include the fundamental requirement to balance short-term needs with those of future generations.

Planning Policy Wales (PPW) is a key policy reference as it details the national land use planning policy. The primary objective of PPW is to ensure 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 Wellbeing of Future Generations (Wales) Act. PPW selects placemaking as the process of creating sustainable places and maximising wellbeing. Importantly, it also requires all development to deliver biodiversity net gain and to evidence this in a Green Infrastructure Statement. It is supported by a number of Technical Advice Notes which are detailed below.

Future Wales: The National Plan is also important, as it is the development framework for Wales. It divides Wales into 4 regions, with Carmarthen in the South West region. Carmarthen is allocated

as a Regional Growth Area within Future Wales. Notably, sustainable growth and regeneration in Carmarthen are encouraged and supported as part of the Regional Growth Areas.

The **Technical Advice Notes (TANs)** provide further important technical advice on the application of national policy set by PPW and Future Wales. With respect to the proposed development, **TAN5: Nature Conservation and Planning (2009)**, **TAN11: Noise (1997)**, **TAN 12: Design (2016)** and **TAN 15: Development, Flood and Coastal Erosion** are of particular relevance.

TAN5 instructs how planning should be used to protect and enhance biodiversity and geological conservation. It sets out the key principles for nature conservation which can be summarised as creating a partnership between local and national authorities and key stakeholders whilst integrating nature conservation into all aspects of planning. There is a main focus on reducing the effects of climate change, which can be achieved by encouraging development that would reduce the damaging emissions and energy consumption to protect the environment.

TAN11 sets out various noise receptors and discusses potential impacts from development. Whilst somewhat dated, it provides useful guidance in relation to development and noise. TAN12 aims to equip all those who are involved in the design and development with advice on how sustainability, through good design, may be facilitated through the planning system.

TAN 15 is a critical reference as it provides a framework within which the flood risks arising from rivers, the sea, and surface water, and the risk of coastal erosion can be assessed. It also provides advice on the consequences of the risks and adapting to and living with flood risk in relation to development and flooding. It replaces the previous 2004 advice. The updated TAN refers to the Flood Map for Planning which identifies flood zones as below. It takes a risk-based approach, so that a locally appropriate approach can be taken during the development management process.

Notably, the proposed development area has no mapped flood risk from the Rivers and Sea according to the Flood Map for Planning. Very low levels of flooding from surface water are found on the southern edge of the site on Fford Pendre road.

Figures 7 & 8- Flood map for Planning (Rivers and Sea - left) and (Surface Water and Small Watercourses - right).



4.2 Local Planning Policy

4.2.1. Carmarthenshire Local Development Plan 2006-2021 and the Revised Carmarthenshire Local Development Plan (2018 - 2033)

The Carmarthenshire Local Development Plan (LDP) was adopted on the 10th December 2014. The LDP sets out the spatial vision for the future of Carmarthenshire and a framework for the distribution and delivery of growth and development. The LDP is currently being updated and on the 10th June 2024 the Council submitted the Deposit version of the Revised Local Development Plan (RLDP) and associated documents to the Welsh Government. On 31 January 2025, Inspectors instructed the requirement to find additional housing sites to be identified within the replacement LDP. This was undertaken by the Council in Spring 2025 alongside associated consultation. It is understood that the outcomes of this consultation are now being finalised by the Council for further consideration by the Inspectors.

In short, adoption of the RLDP is therefore now expected in 2026 but both versions of the Development Plan currently have material weight when considering development proposals.

In respect of the site, it is allocated in both the LDP and RLDP under policy **GA1/MU** in the current LDP and **PrC1/MU1** in the RLDP. The RLDP provides a more updated view of the strategic allocation, reflecting the phases and infrastructure delivered under the current development Plan. Refer to the RLDP Planning Designation maps below.

Figure 9 - Planning Designations & Planning Constraints Map (Current LDP) - GA1/MU - Mixed Use in peach; Existing Employment Areas in purple.

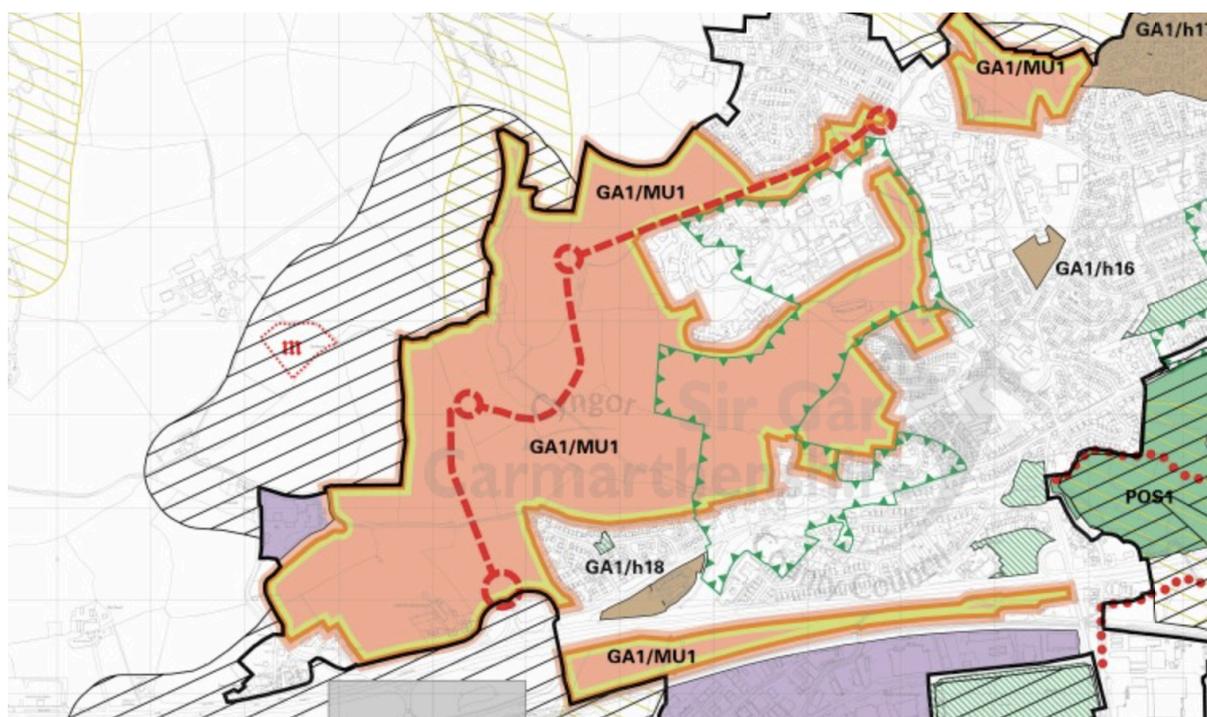
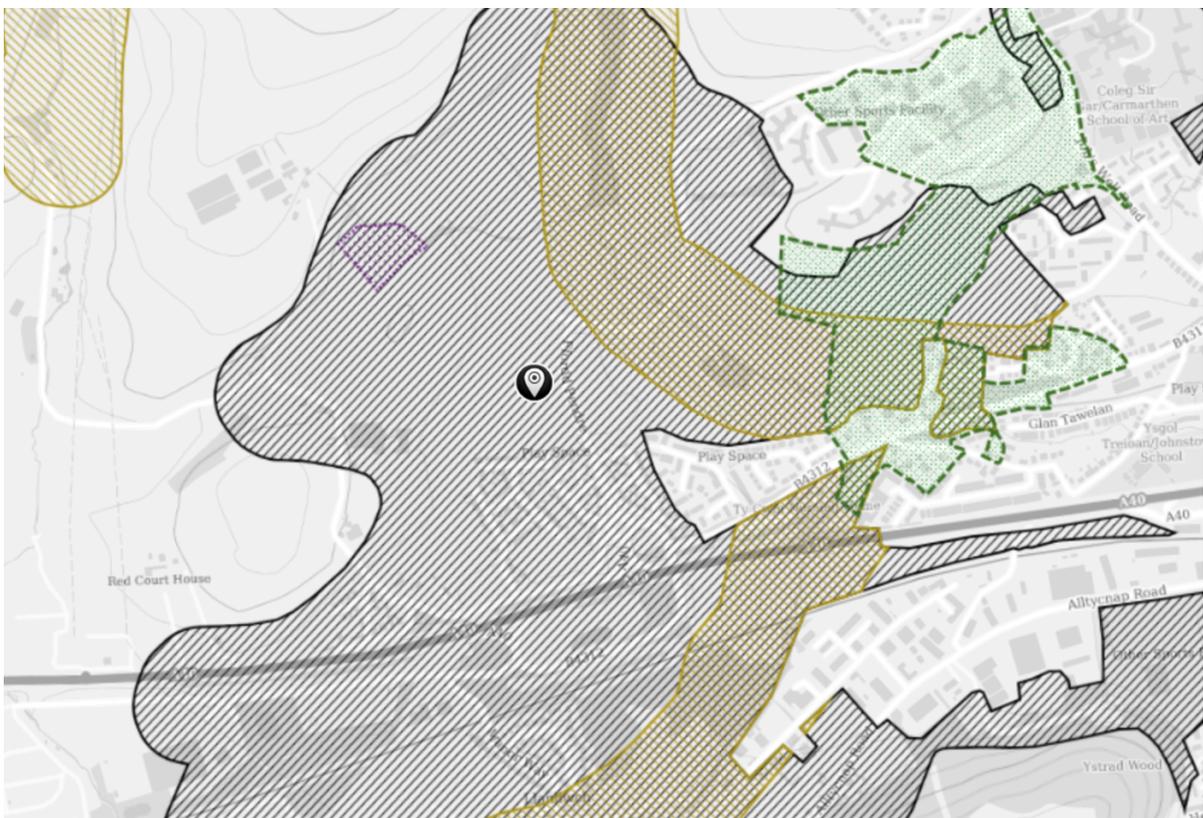
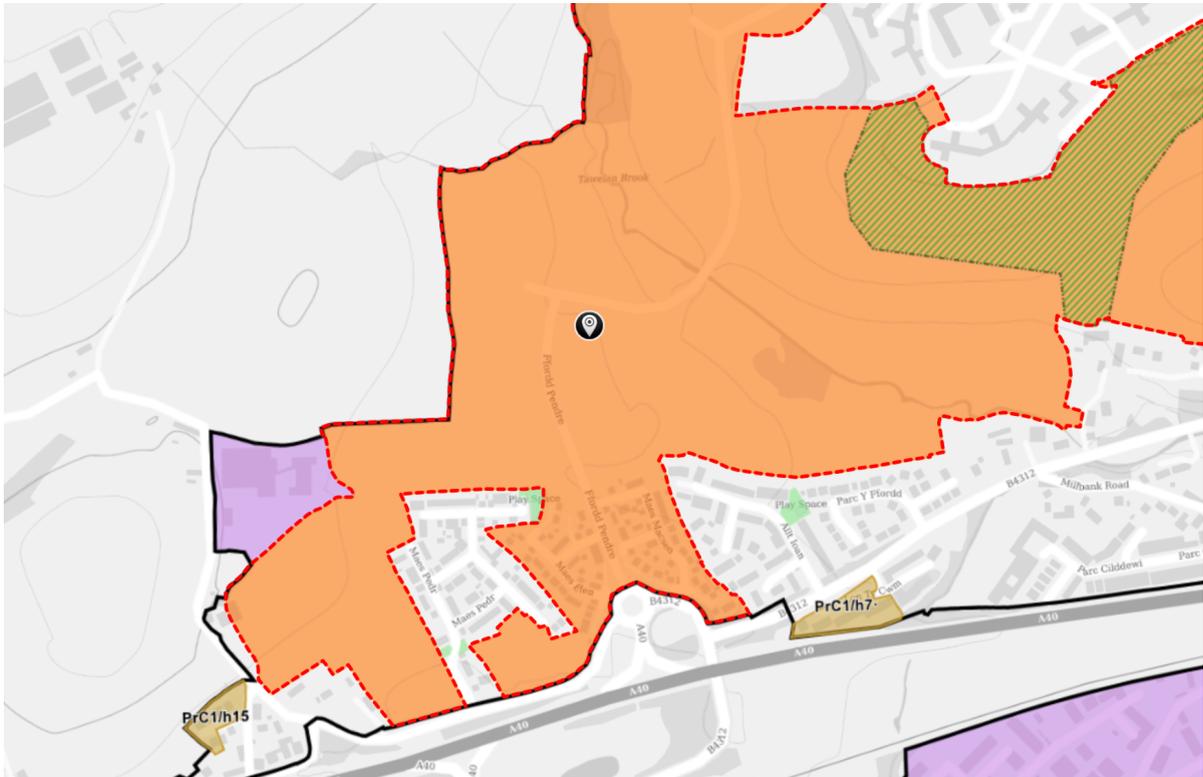


Figure 10 & 11 - Planning Designations (RLDP) - PrC1/MU1 - West Carmarthen in orange; Existing Employment Areas in purple; Amenity Greenspace in green. & Planning Constraints (RLDP).



The site is the subject of the following constraints in the Current and Emerging LDP: *Superficial Sand and Gravel Deposits: Sand & Gravel Safeguarding Area Category 1 (in black dashed areas)*.

The policies from the **current LDP** and **emerging LDP** considered relevant to the proposed development are identified in Table 1 below - **these are the policies the development will need to satisfy in order to secure planning permission**. Gaps in the table indicate where there are no equivalent policies between the two LDPS. A full summary of the relevant local policies is undertaken in Appendix 1 of this Statement.

Table 1: Adopted and Emerging Policies.

Adopted LDP	Emerging Revised LDP
Subject: Principle of Development, Good Design and Strategic Allocations	
Policy SP1: Sustainable Places and Spaces	Policy SP12: Placemaking and Sustainable Places
Policy SP3: Sustainable Distribution - Settlement Framework	Policy SP3: Sustainable Distribution – Settlement Framework
Policy SP4: Strategic Sites	Policy SP1: Strategic Growth
Policy SP5: Housing Policy SP6: Affordable Housing Policy AH1: Affordable Housing	Policy SP5: Affordable Homes Strategy Policy AHOM1: Provision of Affordable Homes
Policy GP1: Sustainability and High Quality Design	Policy PSD1: Effective Design Solutions: Sustainability and Placemaking; and PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods BHE2: Landscape Character
Policy EQ1: Protection of Buildings, Landscapes and Features of Historic Importance	Strategic Policy – SP 15: Protection and Enhancement of the Built and Historic Environment
Policy EQ5: Corridors, Networks and Features of Distinctiveness	Policy NE3: Corridors, Networks and Features of Distinctiveness
Policy H1: Housing Allocation: Growth Areas: GA1/MU1: 1100 allocated units	Policy HOM1: Housing Allocations: PrC1/MU1 - West Carmarthen: 700 units, 84 hectares , delivered over a 11-15 year period.
Policy EMP5: Mixed-use Sites: GA1/MU1 West Carmarthen: Mix of uses consisting of residential (allowance for 1,100 units), employment, community facilities and amenity.	Policy SG1: Regeneration and Mixed-Use Sites: PrC1/MU1 - West Carmarthen: Mix of uses consisting of residential (an allowance for 700 new homes within this plan period), employment, community facilities and amenity.

Adopted LDP	Emerging Revised LDP
Subject: Transport, Access and Active Travel	
Policy SP9: Transportation	Policy SP17: Transport and Accessibility
Policy TR2: Location of Development - Transport Considerations	
Policy TR3: Highways in Developments - Design Considerations	Policy TRA5: Highways and Access Standards in Development
Policy TR4: Cycling and Walking	Policy TRA2: Active Travel
	Policy CCH3 - EV Charging Points
Subject: Biodiversity and Green Infrastructure	
Policy SP14: Protection and Enhancement of the Natural Environment	Policy SP14: Maintaining and Enhancing the Natural Environment
	Policy PSD3: Green and Blue Infrastructure Network; and Policy PSD4: Green and Blue Infrastructure – Trees, Woodlands and Hedgerows
Policy EQ4: Biodiversity	Policy NE2: Biodiversity
Policy SP2: Climate Change	Policy SP16: Climate Change
Subject: Open Space	
Policy REC1: Protection of Open Space	Policy PSD7: Protection of Open Space
Policy REC2: Open Space Provision and New Developments	Policy PSD8: Provision of New Open Space
Subject: Flood Risk and Drainage	
Policy EP3: Sustainable Drainage	
Subject: Noise	
Policy EP2: Pollution	PSD11: Noise Pollution
Subject: Minerals	
Policy SP10: Sustainable Mineral Development Policy MPP3: Mineral Safeguarding	Policy SP18: Mineral Resources Policy MR3: Mineral Safeguarding Areas

4.2.2. West Carmarthen Planning and Development Brief

This Planning and Development Brief (PDB) outlines the aspirations for future development of West Carmarthen and should be used as a guide for the sustainable development of the West Carmarthen Urban Extension. This Brief is equivalent to Supplementary Planning Guidance and is therefore a material consideration in the determination of all future planning applications in this area. As the proposal site is allocated within this strategic allocation, the guidance set out in this document will be material. Such guidance includes meeting the vision and key objectives for the site. Additionally, it sets out three development principles that proposals should seek to deliver:

- **Access and Movement:** Seeks to establish a permeable, legible and safe movement/network through good connections to the surrounding area, walkable neighborhoods and design treatment to convey low vehicle speeds.
- **Landscaping:** Requires a landscape strategy which respects the existing natural environment through the retention of existing landscaping assets of value, sympathetic boundary treatments and planting of native species.
- **Urban Design and the Built Environment:** Seeks to create a high quality and legible built environment that contributes to local distinctiveness and a sense of place.

4.2.3. Supplementary Planning Guidance

Supplementary Planning Guidance (SPG) expands upon the policies outlined in the Local Development Plan for key topics and or types of development. Those most relevant to the development are detailed below:

- **Leisure and Open Space - Requirement for New Developments:** This SPG was prepared to elaborate and consolidate upon the policies and proposals of the Adopted LDP. It seeks to provide additional clarity in relation to the Council's Leisure and Open Space Requirements for New Developments.
- **Nature Conservation and Biodiversity SPG:** Assists developers in identifying the potential for projects and proposals to impact on biodiversity. The Council recognises the important contribution that planning can make to maintaining and enhancing biodiversity within the County, including habitats and species of international, national and local importance and that biodiversity conservation and enhancement has an integral role in sustainable development and is fundamental to the social and economic wellbeing of Carmarthenshire's residents.
- **Placemaking & Design SPG Report (2016):** This SPG has been prepared to guide and promote high quality, sustainable design within the County. The guidance is aimed at securing a deliverable, coordinated, high standard of development and ensuring that proposals reflect and respect the character and requirements of Carmarthenshire.

5. Planning Assessment

To demonstrate how the development proposal satisfies both the adopted Development Plan and the Emerging Development Plan. This section of the statement assesses the proposal against the relevant policies in both Development Plans. Table 2 below also demonstrates how the proposal satisfies wider local policy and also wider national policy and legislation.

Table 2: Planning Assessment

Subject	Scheme Approach and accordance with Policy
<p>Principle of Development</p>	<p>The proposed development site forms part of allocations in both the current and emerging LDPs under policies GA1/MU and PrC1/MU1 respectively. The RLDP sets a requirement for 700 homes and notes the Carmarthen West Link Road is a key delivery indicator; the road has already been completed and opened. The location of development can therefore be considered to be sustainable, and the principle of residential development is deemed to be acceptable.</p> <p>As presented in the supporting Design and Access Statement, the preparation of the design work for the proposal has been undertaken in accordance with the wider strategic masterplan principles for the strategic allocations and the West Carmarthen Planning and Development Brief. In doing so, the proposal distributes development in a sustainable location in accordance with the settlement frameworks and the strategic allocations with a density and layout that will successfully contribute to the wider allocation coming forward with space made to the south to allow the development to link to earlier phases.</p> <p>In terms of placemaking, the proposal also ensures suitable road connectivity to the site and to the wider strategic allocation to the north, ensures visual integration through the use of generous landscaping, and demonstrates a joined-up approach to delivering green infrastructure within the site, while also contributing to biodiversity net gain. The proposal provides a principal area of public open space in the key gateway area to the north that is created by the primary road access and integrates accessible active transport links within the site and to residential settlements in the wider area. These good connections are considered to create a legible and walkable place whilst responding to the existing local</p>

Subject	Scheme Approach and accordance with Policy
	<p>context, retaining high value trees and hedgerows where necessary in accordance with the West Carmarthen Local Development Brief.</p> <p>It is noted that the emerging replacement LDP was stalled due to Inspectors' finding that additional housing sites are required. As such, the delivery of housing and enabling development on this site should be given very significant decision-making weight and importance in the overall planning balance. Additionally, some 50% of the dwellings proposed will be affordable, which goes comfortably over and above targets set out in both the LDP and RLDP and is a further benefit to the proposal.</p> <p>In short, the proposed development demonstrates the Council's commitment to taking a leading role in progressing the delivery of the allocation. The proposed layout will create a healthy and accessible environment, retain and enhance biodiversity, and demonstrate a clear understanding of the site context.</p> <p>It is therefore in accordance with strategic allocation policies GA1/MU (LDP) and PrC1/MU1 (RLDP), strategic policies H1, EMP5, SP3, SP4, SP5, and HOM,1, as well as placemaking policies SP1 and SP12 of the current and emerging LDPs. It also meets national strategic and placemaking guidance set out in PPW, which seeks to direct development to allocated sites and Policies 1 and 2 of the National Plan, which identify South West Wales as a national growth area and generally support the development of allocated sites.</p>
<p>Good Design</p>	<p>As above, the design and layout have followed the placemaking principles of national policies, the site allocation policies, local placemaking policies and the local development brief document.</p> <p>Buildings along the boundary are configured so that they look outwards beyond the site boundary to deliver a more integrated layout with the wider strategic allocation. The proposal provides an appropriate level of density which reflects the surrounding residential densities in the wider area and ensures the housing allocation can be met successfully whilst respecting neighbourhood amenity and providing areas for sustainable</p>

Subject	Scheme Approach and accordance with Policy
	<p>drainage and open space. The layout has been designed to be legible, retain the PROW, and generally seeks to encourage active travel.</p> <p>In terms of the built development, the colour palette and use of materials have been chosen by taking into consideration the surrounding characteristics of the relatively newly built areas around the site in order to provide a robust design approach that responds to the local context. The proposal offers a variety of built forms across the site, which reflect different tenure sizes spread out across the site, creating a blend of built forms that are appropriate in appearance, detailing, and demonstrate high-quality design. All of the proposed homes will follow national and local low carbon requirements to ensure they are energy efficient for the lifetime of the development with an Energy Statement provided in support of the application. The supporting Design and Access Statement goes into greater detail in terms of how the proposal will make a positive contribution to the area through its design.</p> <p>The proposal provides new amenity and play spaces with a principal area of public open space to the north east, the creation of new landscape and ecological elements throughout, whilst enhancing the existing landscaping, particularly at the southern boundary. Invasive species were found on the site which are proposed for removal as part of the overall landscaping and resilient biodiversity strategy, while the SUDS features are also integrated as part of the landscaping strategy. This layout and landscaping approach contributes to the overall sense of place, with private and public areas being clearly defined through the use of landscaping and built features. The layout also allows for natural surveillance of public areas. All of these design choices promote the health, safety, and well-being of the future residents, users, and visitors of the site in accordance with national and local design policy.</p> <p>Overall, the proposed layout and integrated landscaping approach are considered to create a sustainable neighborhood and contribute to high-quality design. The built development and densities respond to the context of the area to contribute to a strong sense of place.</p>

Subject	Scheme Approach and accordance with Policy
	<p>Based on the above, the proposal is considered to comply with the requirements of LDP Policy GP1: Sustainability and High Quality Design and RLDP Policies PSD1: Effective Design Solutions: Sustainability and Placemaking, and PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods. It also follows national design principles set out in TAN12 (Design) and PPW more broadly as well as the principles of the West Carmarthen Development Brief.</p>
<p>Transport and Access</p>	<p>The site benefits from direct access to the new Carmarthen West Link Road which was a key delivery indicator for the strategic allocation and has excellent highway connections to the A48 and M4. There is an established vehicular access point from Fford Pendre, and the proposed access has been designed to accommodate pedestrians, cyclists, and vehicles that access the site and travel along Ffordd Pendre. The proposal therefore complies with the requirements of LDP Policy TR2 in relation to development being sited in a manner consistent with strategic objectives and ensuring access is made for non-car trips, as well as the West Carmarthen Development Brief which seeks to create a legible and safe movement network.</p> <p>Within the site, the proposal provides publicly accessible footpaths through the development for sustainable transport choices and links to the residential area to the south and to the wider strategic allocation. It is envisaged that this connection can be secured through a future phase of the development. Following feedback from the local Highway Authority, the streets within the site will be either shared surface streets or streets with footways on both sides of the carriageway. All adopted roads will be 5.5m with 2m footpaths and private drives can only serve up to 5 plots. The proposal therefore establishes good legibility and connectivity both within the site and linking to the wider area whilst meeting the standards required by the Highway Authority to ensure a safe local highway network. Thus, the proposal is deemed to comply with LDP Policies SP2: Climate Change and SP9: Transportation, as well as RLDP Policy SP17: Transport and Accessibility. It also complies with national policies which strongly encourage active travel and the West Carmarthen Development Brief</p>

Subject	Scheme Approach and accordance with Policy
	<p>Principles which seek a safe and legible transport network and provides specific guidance on road design.</p> <p>All cycle parking will be provided in secure, convenient, and accessible locations, likely to the front of the dwellings or within secure garages to ensure that access to a bicycle is just as convenient as access to a car. Sufficient provision for the installation of EV charging points is also provided as part of the housing design, with details shown in the accompanying plans and Design and Access Statement. As above, the proposal demonstrates good connectivity and access, encourages active travel routes, and provides a safe pedestrian environment.</p> <p>The proposal therefore demonstrates compliance with LDP Policy TR4: Cycling and Walking, RLDP Policies TRA2: Active Travel and CCH3: EV Charging Points, and national policies.</p> <p>The Transport Assessment has demonstrated that the site would not generate an unacceptable level of traffic. The site access roundabout onto Ffordd Pendre has sufficient capacity to accommodate background traffic growth. It is therefore considered that the impact of the proposed development on the surrounding highway network is negligible and that no mitigation is required to accommodate the traffic generated by the proposed 84 dwellings. Any impacts can be further reduced by the adoption of the submitted Travel Plan albeit this may not be considered necessary given the overall negligible impacts. As such, the proposal meets the requirements set out by LDP Policy TR3: Highways in Developments - Design Considerations and RLDP Policy TRA5: Highways and Access Standards in Development.</p>
<p>Landscape and Visual Impact</p>	<p>Critically, the site is part of a major strategic allocation so has been deemed capable of assimilating a visual change and a change of landscape. In their pre-application response, the Landscape Officer acknowledged that the site is not located within or adjacent to an area expected to impact a sensitive landscape.</p> <p>Notwithstanding this, it is recognised that the site is currently agricultural land and whilst there is some existing built development in the locality in</p>

Subject	Scheme Approach and accordance with Policy
	<p>the form of agricultural and commercial buildings and early parts of the wider site allocation being which have been built out, the existing landscape character is relatively open particularly with views from the west. Therefore, the design of the development has attempted to create a robust sense of character that is flexible enough to align with any future development in the wider strategic area in terms of landscape and visual connectivity. This has included the submission of a Landscape and Ecological Design Scheme (contained within Design and Access Statement), Green Infrastructure Statement, Arboricultural Plans and detailed landscaping plans and schedules. The proposal is built to a traditional, relatively low-density scale, with plenty of landscaping elements to screen the site from any potentially sensitive receptors and views. The existing higher quality trees and existing hedgerows to the south are to be retained, which allows screening of the proposed development, particularly from the existing residential development to the south while utilising the existing site context. A higher quality tree (Category B) to the north west of the site is also proposed for retention.</p> <p>The proposal demonstrates that it has mitigated any potential risk of harm to the landscape and visual amenity of the site and of the surrounding areas. It is not expected that any designated sites will be harmed, and key views and vistas will be unimpacted. As discussed above, the proposal incorporates the local distinctiveness of the surrounding residential areas, creating a sense of place and setting - this is more fully set out in the Landscape and Ecological Design Scheme which is contained within the Design and Access Statement.</p> <p>Therefore, the proposal meets the guidance set out by RLDP Policy BHE2: Landscape Character, the placemaking policies discussed above, national policies such as TAN5 and TAN12 and the West Carmarthen Development Brief principles.</p>
Green Infrastructure and Biodiversity	<p>The planning application includes an Ecological Impact Assessment, which has fully identified the ecological value of the site area, and a Green Infrastructure Statement (GIS), which has demonstrated compliance with the Step-wise approach and a net gain in biodiversity in accordance with</p>

Subject	Scheme Approach and accordance with Policy
	<p>Planning Policy Wales. The GIS also sets out how the proposal complies with relevant national and local planning policies. As above, a Landscape and Ecological Design Scheme is contained within the Design and Access Statement which has also informed the proposed design.</p> <p>In summary, the site comprises one agricultural, species-poor grassland field considered to be of negligible ecological importance. The richest habitat on the site is the 'important' species-rich hedgerow and associated wet ditch along the boundaries of the site, particularly the southern boundary. Targeted surveys found evidence of birds in the locality but they were not species that would ordinarily breed within the habitats on site. There were, however, moderate levels of bat activity particularly towards the southern boundary and there is a reasonable likelihood of common amphibians being present, as well as common reptiles and invertebrates. The proposals have fully considered the presence of protected species through targeted surveys informing the mitigation and enhancement strategies. Similarly, the existing hedgerows and higher quality trees identified through the Tree Survey and Arboricultural Impact Assessment will be retained as set out in more detail in the submitted Vegetation Retention & Removal Plan and Green Infrastructure Statement. The allocation policy requires a link to the field south west of the site in order to connect the two phases - provision has been made for this through this application but no actual connection or breach of hedgerow in this area forms part of this application. Any future phase which brings this forward will also be required to meet the ecological requirements - most notably, the site has a moderate suitability for dormice and if any evidence of dormice is found hedgerow needs to be reprovided at a 3:1 ratio. However, overall, the proposals meet the guidance set out by LDP Policy EQ5: Corridors, Networks and Features of Distinctiveness and RLDP Policy NE3: Corridors, Networks and Features of Distinctiveness through retaining higher quality habitat and providing mitigation and enhancement measures.</p> <p>The replacement LDP puts a stronger emphasis on green infrastructure and the protection of biodiversity. The ecological and landscape-led design approach has responded to these requirements. This has included the</p>

Subject	Scheme Approach and accordance with Policy
	<p>interrogation of SUDS, retention of higher quality habitat, and a proposed planting scheme. It is considered, therefore, that the proposal also complies with LDP Policy SP14: Protection and Enhancement of the Natural Environment and Policy SP14: Maintaining and Enhancing the Natural Environment, and RLDP Policies PSD3: Green and Blue Infrastructure Network Policy PSD4: Green and Blue Infrastructure – Trees, Woodlands and Hedgerows.</p> <p>Similarly, the proposed landscaping scheme is critical to delivering a biodiversity net gain for the site. The scheme provides a significant improvement through the use of native trees, shrub, meadow and hedges planting to enhance the diversity of the site. This is further assessed through the DECCA framework in the Green Infrastructure Statement. The planting palette proposed can be seen in more detail on the submitted Landscape Strategy Plan and the Landscape & Ecology Plan. Overall, the proposal complies with LDP Policy EQ4: Biodiversity and RLDP Policy NE2: Biodiversity.</p> <p>Overall, given the relatively limited baseline line of the site, the scale of the proposal and scope of the proposed mitigation measures in respect of habitats and protected/notable species, it is considered that the proposed development is capable of compliance with relevant wildlife legislation and planning policy for the conservation of the natural environment at all levels.</p>
Flood Risk and Drainage	<p>The site is not in an area of high flood risk in terms of river or sea and there is a very low risk of surface water flooding. The proposed development has incorporated drainage infrastructure elements, including integrated SUDS and a large attenuation basin to account for the proposals and ensure any increased flood risk resulting from the development is alleviated. Surrounding the new homes will be multi-purpose landscaping that creates opportunities for biodiversity enhancement as well as natural drainage through the use of rain gardens, for example. The full extent of the SUDS can be seen in more detail on the SUDS Strategy Plan. Overall, the proposal is deemed to comply with LDP Policies SP2: Climate Change and EP3: Sustainable Drainage, RLDP Policy SP16: Climate Change and TAN 15.</p>

Subject	Scheme Approach and accordance with Policy
	<p>It should also be noted that a separate SAB submission will be necessary where flooding and drainage can be scrutinised in further detail where required.</p>
<p>Archaeology and Heritage</p>	<p>The allocation of the site for development and the agricultural nature of the land indicate that adverse archaeological or heritage impacts are unlikely. However, an Archeology and Heritage Assessment was undertaken to demonstrate that the proposal would not cause any harmful impacts on the historic environment. It found that, in terms of both designated historic assets and historic assets of special local interest, no asset would experience a loss of significance and therefore no asset would be harmed by the proposed development. As such, no mitigation measures are considered to be necessary or desirable.</p> <p>In terms of archaeological remains, there is a low potential for remains that are greater than a limited, local significance. The highest potential remains are post medieval and modern archaeological remains relating to agricultural practices but these have negligible archaeological interest. The heritage assessment concludes that there is limited value in further archaeological works being undertaken and there is no reason why the proposed development could not come forward in accordance with local and national historic environment policies.</p> <p>Overall, no mitigation or compensation measures are necessary or desirable and the proposal complies with LDP Policy EQ1: Protection of Buildings, Landscapes and Features of Historic Importance and RLDP Strategic Policy – SP15: Protection and Enhancement of the Built and Historic Environment.</p>
<p>Noise and Air Quality</p>	<p>An Environmental Noise Assessment has been undertaken to understand and to appropriately mitigate any potential noise impacts caused by the proposed development on any sensitive receptors.</p> <p>Noise from the Wynnstay agricultural facility has been observed to be audible across the site and is indicated to be running constantly. It is, however, unfeasible to undertake a BS 4142 assessment as the background noise levels across the site are controlled by noise from the</p>

Subject	Scheme Approach and accordance with Policy
	<p>facility, which forms part of the background sound climate in this area. The absolute noise levels from the facility are indicated to be sufficiently controlled in respect to dwellings without any upgrades to the external building fabric being necessary. Any impact is appropriately addressed by the standard building fabric that will be used and will be sufficient to control noise intrusion. It is also noted that residential development has recently been approved in the locality as part of the wider allocation and impacts would have been considered as part of the site allocation process.</p> <p>In terms of air quality, the site falls outside of the Carmarthen Air Quality Management area. Therefore, the pre-application responses stated that impacts upon the AQMA will depend on the number of vehicular trips generated and the findings of the Transport Assessment. The pre-application response from Highways stated that a Transport Assessment would be sufficient for the scheme and the need for an Air Quality Assessment was not raised by the Highway Authority. The submitted Transport Assessment concludes that the 42 private dwellings proposed could generate a total of 310 vehicle movements throughout the day whilst the affordable housing element will generate 170 movements. It also accounts for approximately 9 deliveries a day as well as pedestrian, cycling and public transport movements. The Assessment concludes that the development will have a negligible impact on the highway network and no mitigation is required to accommodate traffic. It states that this could be further reduced by a Travel Plan which has also been submitted and seeks to reduce the need to travel and generally seeks to improve air quality through the promotion of shopping locally, highlighting the benefits of car sharing, promoting working from home and providing a newsletter with updated travel information and initiatives. As such, a specific Air Quality Assessment is not considered to be required and air quality in the locality is considered to be protected.</p> <p>Therefore, the proposal demonstrates minimised noise and air pollution and is deemed to comply with the requirements set out by the LDP Policy EP2: Pollution and RLDP PSD11: Noise Pollution as well as TAN11.</p>

Subject	Scheme Approach and accordance with Policy
<p>Open Space</p>	<p>The application site relates to an agricultural field and an existing public right of way will be retained. As such, there is no loss of existing public open space in accordance with LDP Policy REC1 and RLDP Policy PSD7, which both refer to the protection of open space.</p> <p>Developments of 5 dwellings or more are required to provide open space in accordance with the Council's open space standards. The RLDP refers to the Council's Open Space Assessment and states that the figures should be considered holistically alongside accessibility standards. It should also be noted that Fields in Trust guidance sets out that average household sizes are generally lower in Wales compared with England and the proposed development includes 4 one-bedroom dwellings and 28 two-bedroom dwellings, with smaller units that are likely to have a lesser population therefore making up a significant proportion of the proposal.</p> <p>A total of 1ha of public open space is proposed which includes integrated SUDS features and a 130sqm LAP in the north-eastern corner of the site alongside more informal play and picnic areas. A nature play area is proposed for the south-eastern corner, and integrated play elements are proposed along the pathway to the western edge of the site to provide a mix of linear and other forms of public open space. Overall, this results in a generous level of public open space being proposed with a positive mix of differing features.</p> <p>It is considered that a proportionate design approach has been provided with sufficient open space proposed to cater for the scale of the development. As above, considerable decision-making weight should be given to bringing forward the allocated site as well as a significant level of affordable housing being proposed. The proposed well-designed play spaces are considered to be further benefits that weigh in favour of the scheme.</p>
<p>Minerals</p>	<p>The development site is located in a Sand & Gravel Safeguarding Area (Category 1). It has been demonstrated that the Sand and Gravel Resource would remain unaffected by the proposed development and therefore be</p>

Subject	Scheme Approach and accordance with Policy
	<p>safeguarded from any impacts that would unnecessarily sterilise or hinder their extraction.</p> <p>Therefore, the proposal is deemed to comply with LDP Policy SP10: Sustainable Mineral Development and Policy MPP3: Mineral Safeguarding, and RLDP Policy SP18: Mineral Resources and Policy MR3: Mineral Safeguarding Areas.</p>
<p>Agricultural Land</p>	<p>The site consists of Grade 3A agricultural land which is classified as ‘best and most versatile’ agricultural land. SP14 of the LDP requires consideration to be given to the countryside, including best and most versatile agricultural land, in accordance with national policies. National policy includes PPW which states that planning decisions should give considerable weight to protecting the best and most versatile agricultural land but goes on to state that the loss of such land is permissible where there is an overriding need for the development.</p> <p>The site is part of an allocated site with the LPA pre-application response stating that the development of the site is integral to the implementation and delivery of strategic development, regeneration and sustainability objectives. The site remains allocated in the emerging Development Plan and it is notable that insufficient housing sites have been identified in the emerging plan to date. As such, very significant weight should be given to the development of this allocated site. The pre-application response stated that the proposal would broadly align with PPW and this is considered to be exacerbated based on the status of the merging plan. The development is therefore also considered to be compliant with SP14 of the LDP.</p>

The above table has demonstrated that the principle of development is established and the proposed scheme is acceptable in policy terms across the relevant key issues. The scheme meets national and local placemaking aims which seek to secure sustainable development and create safe and attractive developments with a sense of place. There are no expected heritage or landscape harms with a net gain in biodiversity also provided. There are clear benefits to the scheme, principally through bringing forward an allocated site, thus meeting national and local policy which seeks to bring forward strategic, plan-led development.

6. Summary and Conclusion

This Planning Statement accompanies a detailed planning application to deliver 84 residential units at Carmarthen West. The statement set out all of the details for the application; it describes the site and proposed development, summarises the planning history of the site and the relevant planning policy which the development should be considered, and offers an analysis of the proposed development against the relevant planning policy.

The principle of delivering the proposal, which is part of the wider strategic Carmarthen West site allocation, is considered sound on planning policy grounds. The proposal meets the definition of sustainable development as required by national planning policy and legislation and the specific requirements of the adopted Local Development Plan policies. The provision of residential development, including a large proportion of affordable housing, should be given significant decision-making weight.

The design of the proposal creates a robust and high-quality environment that significantly improves the existing drainage and biodiversity conditions of the site, while the layout allows for a well-incorporated transport and visual connection with the future developments of the wider strategic allocation.

To conclude, the proposal is therefore considered to meet the relevant national planning policies as well as relevant local policies in both the current and emerging LDPs. The development contributes to the development of an allocated site in both the current and emerging LDPs through the provision of housing and other enabling development. This is considered to be a significant planning benefit of the proposals alongside the well-thought-out landscape-led design, provision of affordable housing, biodiversity net gain, and improved health and wellbeing outcomes.

Appendix 1: Policy Summary

Table 3: Relevant policy summary - Carmarthenshire LDP 2006-2021

Policy	Summary
Policy SP1: Sustainable Places and Spaces	Encourages sustainable development through; locating development in sustainable locations, making efficient use of land, integrating development with the local community and existing character, creating safe and accessible places, promoting active travel and improving social and economic wellbeing.
Policy SP2: Climate Change	Supports proposals which respond to and are resilient to the impacts of climate change. Promotes the efficient consumption of resources, encourages sustainable transport and promotes the use of energy and waste hierarchies.
Policy SP3: Sustainable Distribution - Settlement Framework	Sets the sustainable growth areas for the County which includes Carmarthen.
Policy SP4: Strategic Sites	Refers to the strategic growth sites which includes West Carmarthen.
Policy SP5: Housing	Provides figures for housing allocations throughout the County with growth areas such as Carmathen being allocated for a significant proportion of housing.
Policy SP9: Transportation	Seeks to ensure a safe and efficient transport system through reducing the need to travel by car and encouraging active travel. Also sets the policy basis for the improvements to the Carmarthen West Link Road which have now been brought forward.
Policy SP10: Sustainable Mineral Development	Ensures a continuous supply of minerals through managing exciting reserves and protecting mineral safeguarded areas.
Policy SP14: Protection and Enhancement of the Natural Environment	Seeks to protect and enhance the natural environment by requiring development to consider statutorily designated sites, biodiversity, locally important sites, best and most versatile agricultural land, the open countryside and other natural assets such as air and soil.

Policy	Summary
Policy GP1: Sustainability and High Quality Design	Promotes high quality design by encouraging the incorporation of existing features and materials, providing appropriate drainage responses and by avoiding adverse amenity impacts. Seeks to create safe and accessible spaces through appropriate access points and safe and legible transport and parking arrangements.
Policy AH1 and SP6: Affordable Housing	Seeks to secure affordable housing through development proposals with the highest proportion required being 30% in higher viable areas.
Policy EQ1: Protection of Buildings, Landscapes and Features of Historic Importance	Does not support proposals that will not preserve landscapes, historic assets or sites of archaeological interest.
Policy EQ4: Biodiversity	Only permits development that will have an adverse impact on priority species or habitats where impacts can be suitably mitigated or in exceptional circumstances.
Policy EQ5: Corridors, Networks and Features of Distinctiveness	Supports proposals that will not adversely impact ecological networks or features of distinctiveness.
Policy H1: Housing Allocation	Sets out the Council's housing allocations with Carmarthen West being a strategically allocated site.
Policy EMP5: Mixed-use Sites:	Highlights the wider West Carmarthen allocation as a mixed use site for 1,100 residential units as well as employment and community facilities.
Policy TR2: Location of Development - Transport Considerations	Only permits proposals which will have significant trip generation where the development is located in a manner consistent with strategic policies, is accessible through non car modes of transport and a Travel Plan has been considered.
Policy TR3: Highways in Developments - Design Considerations	Sets specific layout design considerations such as integrated networks for safe active travel, access for public transport, appropriate parking provision, infrastructure for those with mobility issues and the avoidance of surface water run off on the highway.

Policy	Summary
	Also supports proposals which will not be detrimental to highway safety or other offsite congestion in terms of parking.
Policy TR4: Cycling and Walking	States that, where appropriate, development should facilitate links to cycleways, public rights of way or bridleways.
Policy REC1: Protection of Open Space	Only allows for the loss of public open space in certain circumstances such as providing suitable replacements or where a deficiency in open space is not created through the loss.
Policy REC2: Open Space Provision and New Developments	Seeks to secure 2.4ha of public open space per 1000 population for development proposals of 5 units or more.
Policy EP2: Pollution	Requires that new development minimises pollution including water quality, air quality, light and noise pollution and in relation to contaminated land.
Policy EP3: Sustainable Drainage	Requires that development proposals have fully investigated the use of SUDS and requires suitable justification if SUDS are not incorporated.
Policy MPP3: Mineral Safeguarding	States that planning permission will not be granted where development permanently harms aggregates and coals within mineral safeguarding areas except in specific circumstances.

Table 4: Relevant policy summary - Carmarthanshire RLDP 2018-2033

Policy	Summary
Policy SP1: Strategic Growth	Sets the strategic housing and employment targets for the County with a focus on being consistent with the spatial strategy.
Policy SP3: Sustainable Distribution – Settlement Framework	Directs growth and development to sustainable locations with Carmarthen noted as a Tier 1 principal centre.
Policy SP5: Affordable Homes Strategy and Policy AHOM1:	SP5 generally supports sustainable and balanced communities through the provision of affordable housing. AHOM1 specifically sets

Policy	Summary
Provision of Affordable Homes	out affordable housing targets with 20% affordable units required on sites of 51-100 dwellings.
Policy SP12: Placemaking and Sustainable Places	Requires development to acknowledge local distinctiveness, create a sense of place and deliver net benefits in biodiversity. It seeks to do this through attractive and legible layouts, enhancement of existing green infrastructure, adapting to climate change, utilising existing materials, creating opportunities for active travel and incorporating SUDS.
Policy SP14: Maintaining and Enhancing the Natural Environment	Requires that development proposals protect and enhance the natural environment of the County through enhancement of biodiversity, providing resilient ecosystems and avoiding significant loss of habitat. Recommends the refusal of permission where enhancement is not provided unless significant material considerations indicate otherwise.
SP15: Protection and Enhancement of the Built and Historic Environment	Generally seeks to preserve or enhance the historic environment including local character and cultural qualities of the plan area.
Policy SP16: Climate Change	Supports proposals which will increase resilience from and minimises impacts of climate change. It does this through sustainable transport principles, incorporation of SUDS, promotion of energy efficient and climate responsive design.
Policy SP17: Transport and Accessibility	Requires integrated, accessible, safe and sustainable transport networks through; reducing reliance on private cars, supporting active travel, enhancing accessibility and providing appropriate levels of parking.
Policy SP18: Mineral Resources	Seeks to protect the County's mineral resources such as aggregate reserves at a strategic level. Identifies areas of Sand and Gravel on the accompanying proposals maps.
Policy PSD1: Effective Design Solutions: Sustainability and Placemaking; and	Placemaking policy which seeks to secure high quality design by reflecting local context, delivering appropriate built forms, making efficient use of sites and contributing effectively to the public realm.

Policy	Summary
Neighbourhoods	Also seeks to maximise landscape enhancement including optimised SUDS and resilient drainage methods. Finally, it requires safe and efficient active travel networks and an overall legible sense of place.
PSD2: Masterplanning Principles – Creating Sustainable	Requires an integrated masterplan on development sites of 50 homes or more. Principles of masterplanning include a breakdown of densities across the site, sustainable transport choices, linking to the surrounding community, integrated green and blue infrastructure, integrated landscape form and facilities to meet the needs of the community.
Policy PSD3: Green and Blue Infrastructure Network	Specifically requires effective green and blue infrastructure design solutions to deliver overall enhancement to the site as well as effective integration. Confirms that Green Infrastructure Statements are a requirement of applications in accordance with PPW.
Policy PSD4: Green and Blue Infrastructure – Trees, Woodlands and Hedgerows	Seeks to retain or minimise impacts on existing trees, woodlands and hedgerows and provide compensation where necessary. Requires that development delivers additional tree, woodland or hedgerow planting where appropriate to deliver longer term landscape benefits.
Policy PSD7: Protection of Open Space	Generally seeks to avoid the loss of and, where possible, enhance public open space.
Policy PSD8: Provision of New Open Space	Requires developments of 5 dwellings or more to contribute to open space in accordance with the Council's open space standards.
PSD11: Noise Pollution	Requires mitigation measures to be provided if development will lead to detrimental noise impacts.
Policy NE2: Biodiversity	Seeks to ensure that development maintains and enhances biodiversity with any adverse impacts required to be addressed in accordance with the mitigation hierarchy. Does not permit any significant loss of habitats or populations of species.
Policy NE3: Corridors, Networks and Features of Distinctiveness	Specifically refers to ecological corridors, networks and features of distinctiveness and requires their retention and appropriate

Policy	Summary
	management. Also does not permit any significant habitat or species population loss.
BHE2: Landscape Character	Requires development to relate to specific landscape and visual characteristics of the local area in order to protect overall landscape integrity. It does this through; identifying and protecting distinctive landscapes, protecting designated landscapes and protecting any other specific features, views or vistas.
Policy HOM1: Housing Allocations: PrC1/MU1 - West Carmarthen And Policy SG1: Regeneration and Mixed-Use Sites	Specifically allocates 700 dwellings at the West Carmarthen allocation across the plan period. Notes the Carmarthen West Link Road is completed and open and was a key deliverability indicator.
Policy TRA2: Active Travel	Supports proposals which will enhance active travel through legible and convenient routes and facilities and improvements to existing connections including public rights of way.
Policy TRA5: Highways and Access Standards in Development	Supports development that incorporates necessary road classifications, appropriate visibility splays, does not result in off-site parking congestion and does not generate unacceptable levels of traffic.
Policy CCH3 - EV Charging Points	Requires that development proposals include the installation of sockets for electric vehicle charging. In terms of houses, this is where the house has a garage, driveway or dedicated parking bay.
Policy MR3: Mineral Safeguarding Areas	Does not permit development where it would permanently steriles resources of aggregate within mineral safeguarding areas unless the extraction of the mineral is unacceptable, has already been extracted, the development is temporary or the development would not have a significant impact on the potential working of the resource.