



**PLANNING, DESIGN AND ACCESS STATEMENT**  
**CONSTRUCTION OF 12 INDUSTRIAL UNITS (B1 AND B8 USE) AT**  
**LAND BETWEEN A40 AND RAILWAY, LLANLLWCH, CAMARTHEN**

On behalf of  
Mrs N. Andreu and Mr A. Davies

Our Ref: 1218.d  
Date: February 2024  
Prepared by: RDG

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## 1.0 INTRODUCTION

1.1 Evans Banks Planning has been instructed by Mrs N. Andreu and Mr A. Davies (the Applicants) to prepare this Planning, Design and Access Statement to accompany an outline planning application for the Construction of 12 Industrial Units (B1 and B8 Use) at Land Between A40 and Railway, Llanllwch, Carmarthen.

1.2 This Statement therefore forms part of the submissions of the application to be considered by the Authority, and in compliance with the requirements of TAN12 provides information on the following points:

- A brief description of the site and surrounding area
- A description of the proposed development
- Consideration of relevant local planning policy
- Accessibility
- Character
- Community Safety
- Environmental Sustainability
- Movement to, from and within the development

1.3 This Planning, Design and Access Statement has been prepared following the guidance set out in *Planning Policy Wales* (12<sup>th</sup> Edition) (February 2024) and *Technical Advice Note 12: Design (2014)*, particularly the objectives of TAN 12 for facilitating 'good design', summarised in the diagrams below.



Figure 1 – Objectives of Good Design

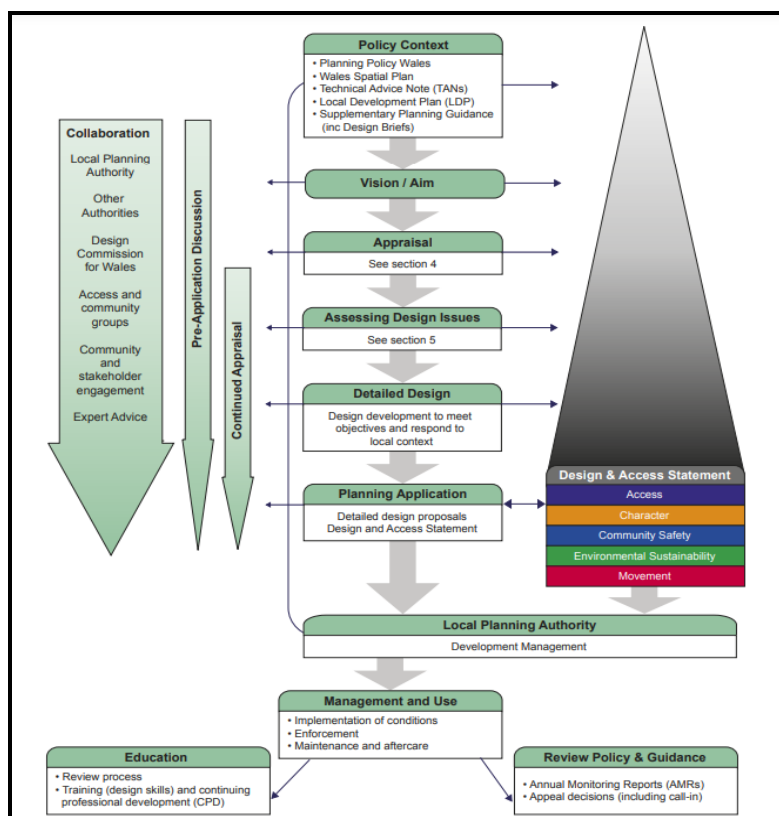


Figure 2 - The Stages Required to Achieve Good Design

## 2.0 SITE DESCRIPTION

### 2.1 THE SITE

- 2.1.1 The application site comprises an enclosed area of land that runs to approximately 1.15 hectares (circa 2.85 acres) and consists predominantly of semi-improved grassland. Photograph 1 shows an aerial view of the site, while Photograph 2 provides a “Google Earth” image of the site, showing its immediate location.



**Photograph 1**



**Photograph 2**

- 2.1.2 The site forms part of a larger agricultural enclosure which is bounded by hedgerows and trees, together with stock proof fencing. Lines of trees also run through the centre of the site.
- 2.1.3 The site is composed of two grazed sloping paddocks to the east of the access that are sheltered from prevailing winds. The field lies immediately off the eastern flank of the B4312, also referred to as St Clears Road, which is accessible off the southern flank of the A40 that runs to the north of Llanllwch from London to Fishguard. The southern part of the site is flanked by the Carmarthen to Tenby railway line.
- 2.1.4 The land currently benefits from a short access lane and ramp just off St Clears Road set some 100 metres off the A40, with a metal access gate set back from the near edge of carriageway which is illustrated below.



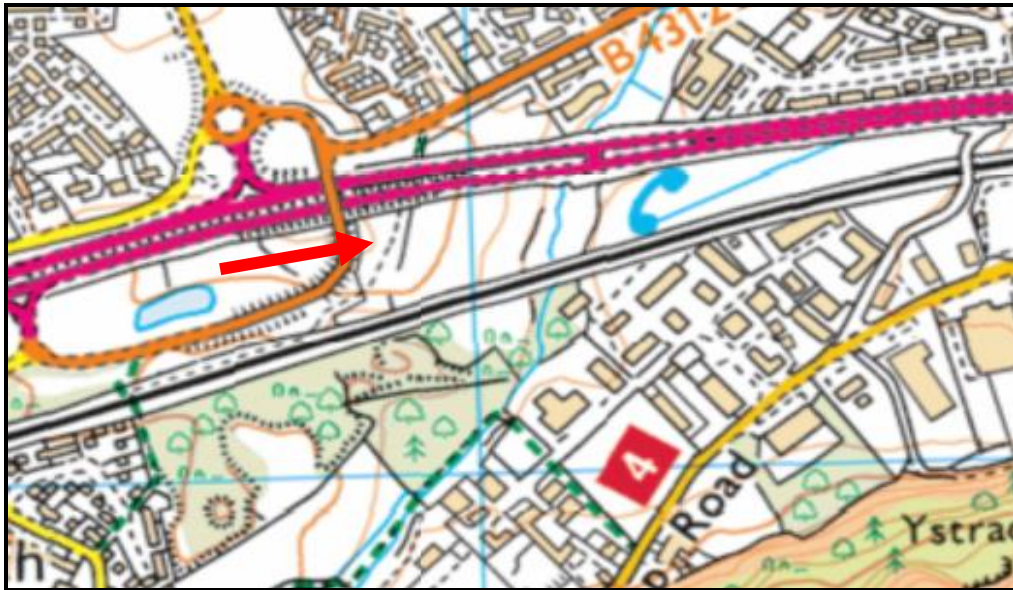
**Photograph 3 – The Visibility Splay Facing North from the Site onto  
St Clears Road**



**Photograph 4 – The Visibility Splay Facing West from the Site onto  
St Clears Road**

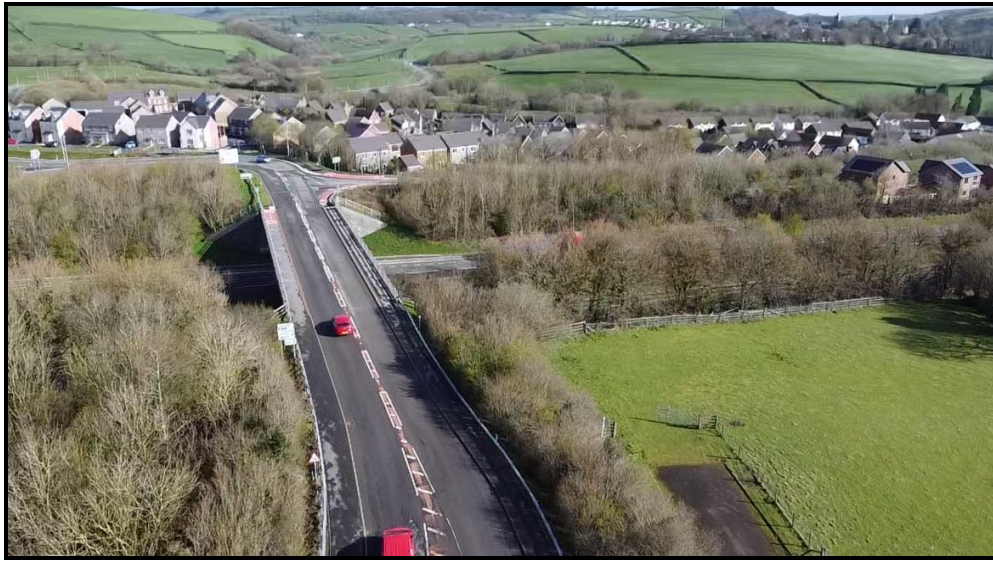
## 2.2 THE SURROUNDING AREA

- 2.2.1 The site lies within a 5–10-minute walking distance of the hamlet of Llanllwch. Llanllwch is located approximately 2 miles (3.2 km) west of Carmarthen and is home to St Marys Church and Cors Goch Nature Reserve. Plan A provides a wider illustration of the sites position.



**Plan A – OS Explorer Map with Application Site identified**

- 2.2.2 The field enclosure is set to the north of the adjoining Cillefwr Industrial Estate, which is home to stores such as Screwfix and Howdens, as well as both the Carmarthen Athletic RFC and Carmarthen Wanderers Cricket Club grounds. Located to the north and south west are developed areas of residential dwellings.
- 2.2.3 The Application Site's well-defined perimeters and proximity to adjacent residential and commercial properties are shown within Photograph 5 below.



**Photograph 5**

2.2.4 In the wider sense, the settlement of Johnstown is located just a short 3-minute drive away (1.4 miles), with amenities such as the Carmarthen Leisure Centre, several sports clubs, an Excel Bowl venue, and the Queen Elizabeth High School, as well as the Tesco Extra and an ALDI on the Carmarthen side.

2.2.5 The centre of the town of Carmarthen is located just a short 6-minute drive away (2.2 miles). Carmarthen is a hub of activity with its vast array of transport links, such as the Carmarthen Rail and Bus Station, as well as a wide range of commercial outlets, community facilities and local services.

2.2.6 In terms of accessibility, the site is located in close proximity a number of bus stops, both in Llanllwch and along the A40, with Services **221, 222, 224, 322 and B11**

running to Carmarthen and onwards. The **National Cycle Route 4** – Carmarthen to Swansea – runs through Johnstown, just 1.4 miles from the site.

## 2.3 PROJECT DESIGN PARAMETERS AND PRINCIPLE

2.3.1 As a result of the above, the following design principles and parameters have influenced the design subject of this planning application:

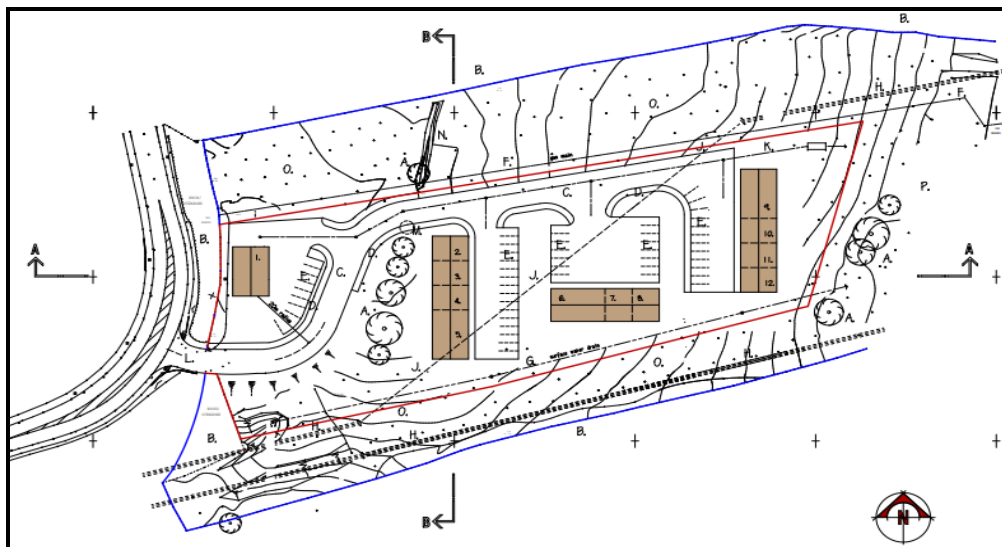
- **Density** – The proposal represents a balance between making efficient use of a greenfield site, whilst being respectful and sympathetic to the existing adjoining built form of the settlement the site forms part of and its existing biodiversity assets.
- **Layout** – The proposal has been steered by existing adjoining development and land uses, together then by the site's topography and its means of access.
- **Scale** – The proposal is for a mix of 12 industrial B1 and B8 units.
- **Biodiversity** – The proposal will avoid ecological assets located to its east, whilst retaining any of value within the application site boundary.
- **Surface Water Drainage** – All surface water generated by the proposed development shall be managed in a sustainable manner in line with current regulatory requirements.

## 3.0 THE PROPOSED DEVELOPMENT

- 3.1 The proposals seek outline planning permission for the construction of a mix of 12 B1 and B8 units of varied size and type. The development ensures that it remains responsive to all existing and future needs of the businesses in the local and wider area. The application is in outline format only at this stage, with all matters other than access and scale to be reserved for a future application. The following information therefore provides an overview of the scheme and should be read in conjunction with the accompanying supporting documentation and drawings.

### *General Siting and Design*

- 3.2 The general layout of the site has been steered by a number of on-site and off-site factors. Its point of access will be via its western boundary, via St Clears Road, leading into the site, off which all units will gain direct or in-direct access, as illustrated below.



**Plan B – Outline Site Plan**

- 3.3 The proposals have sought to use the slightly sloping land to form a series of B1 and B8 units over the majority of the field enclosure. A single point of access exists via an

established gated access lane which would then serve a newly created road that enables the appropriate access to all parts of the site, for its occupiers and any construction vehicles or future maintenance operatives that may need to access the site.

- 3.4 As illustrated in Plan B, the overhead electric cables will be diverted so that it does not interfere with or pose a risk to the proposed development. The existing overhead cables that run along the southern boundary of the site will remain in situ and present no risk to the development.

#### *Scale Parameters*

- 3.5 The proposed units' scales will be: -  
Minimum Length – 10m – Maximum Length – 14m  
Minimum Width – 8m – Maximum Width – 16m  
Height Level from slab to ridge will be – Minimum Height 7m – Maximum Height 10m

#### *Drainage*

- 3.6 All foul water will be disposed of via a new connection to the existing public sewer network.
- 3.7 All surface water will be captured and dealt with in line with current surface water regulations, which will include a mix of on-site measures.

#### *Access and Parking*

- 3.8 The proposed development will be served by a new dedicated access road, complete with turning facility. Its whole length will have a central carriageway with pedestrian footways on much of both of its sides.
- 3.9 Each of the proposed units will be served by an appropriate level of off-street car parking, in-line with current parking guidance requirements and the site's sustainable location.

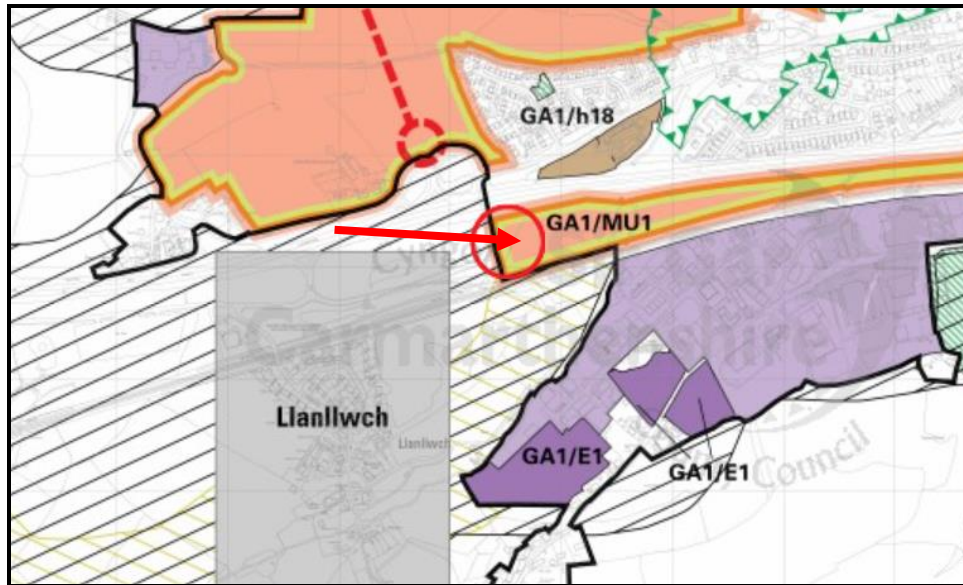
## 4.0 PLANNING POLICY

### 4.1 LOCAL PLANNING POLICY

4.1.1 In terms of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the adopted development plan for the area within which the application site lies is the *Carmarthenshire Local Development Plan (LDP)*. It is therefore the policies of this document that have been referred to in the preparation of the proposal subject of the planning application in question, including the following:

- GP1 - Sustainability and High Quality Design
- GP2 - Development Limits
- GA1/MU1 – West Carmarthen
- EMP5 – Mixed Use Sites
- EQ4 – Biodiversity
- EQ5 - Corridors, Networks and Features of Distinctiveness
- TR3 - Highways in Developments – Design Considerations

4.1.2 Under the provisions of the current Carmarthenshire LDP, the site presently forms part of the larger 'West Carmarthen' strategic site allocation, as illustrated below. Plan C provides an extract from the LDP Proposals Map, with the application site highlighted for ease of identification, being part of the proposed employment site, identified as GA1/MU1 at West Carmarthen.



**Plan C – LDP Proposals Map extract – Land Between the A40 and Railway Line  
at Llanllwch**

4.1.3 The site as shown lies in land allocated as a “Mixed Use Site” defined by the Policy EMP5 in the LDP, being allocated for a “*Mix of uses consisting of residential (allowance for 1,100 units), employment, community facilities and amenity*”. The land also crucially lies outside the Conservation Area located north of the site outlined in green.

4.1.4 With the principle of the proposal therefore supported by Policy GP2, Policy EMP5 and Policy GA1/MU1, the more detailed policy related requirements are now considered.

#### Policy GP1 – Sustainability and High Quality Design

4.1.5 Policy GP1 (*Sustainability and High Quality Design*) provides the overarching framework for high quality design in development, conservation and enhancement

proposals within the County. For development proposals to be permitted they must accord, where relevant, to 14 Criteria. Taking into account the nature and form of the application proposal, it is considered that 7 are of relevance to the proposed development and an assessment of the application proposal against each now follows:

- 4.1.6 Criterion a) requires that developments conform and enhance with the character and appearance of the site, building or area. The proposed application has given full consideration to its setting in the immediate and wider sense with regard to the scale of the proposed development and its positioning within the existing urban form. This has been achieved through the proposal respecting the sites topography, on site ecological assets and surrounding landscape features.
- 4.1.7 As a result, and although in outline format, the proposal adheres to the requirements of Criterion a), b) and c).
- 4.1.8 Criterion d) then requires that the proposal does not have a significant impact on the amenity of adjacent land uses, properties, residents, or the community. The proposed parcel of underused greenfield land – allocated as a mix use site - is of an appropriate size for its proposed use, particularly when its topography is taken into consideration. In addition, the accompanying layout for the proposal, highlights that sufficient separation can be achieved between existing and proposed units to ensure that all interests are protected. The proposal therefore satisfies the requirements of Criterion d).
- 4.1.9 Criterion f) requires the retention of important local features such as trees and hedgerows, together with the use of good quality hard and soft landscaping. As mentioned above, although the application site has little in terms of habitat value, it is proposed that the existing hedgerows and trees that border the site will be retained, as well as the line of trees that run through the site.

- 4.1.10 The above ensures therefore that the requirements of Criterion f) will be fully supported and satisfied by the application proposal, as will in turn the requirements of Policy EQ4 and EQ5, which are discussed further below.
- 4.1.11 Criterion h) states that an appropriate access/exit must be provided which does not give rise to any parking or highway safety concerns on the site or within the locality. The development proposes a modified access road directly off St Clears Road. As detailed in the accompanying Transport Statement, the new access road will be served by sufficient levels of visibility and provide safe access to and from the site for all users. This combined with an adequate level of off-street parking to serve each of the proposed units, ensures that the scheme adheres to the requirements of Criterion h), and in turn those of Policy TR3.
- 4.1.12 The final criterion for consideration - Criterion j) – then sets out the need to ensure the provision for satisfactory generation, treatment, and disposal of both surface and foul water from all developments. As detailed above, the proposal will be served by a new connection to the existing public sewer network, whilst all surface water will also be served in line with current regulatory requirements.
- 4.1.13 In conclusion it is therefore considered that the proposed development complies with all relevant aspects of Policy GP1 (*Sustainability and High Quality Design*).

#### Policy EQ4 – Biodiversity

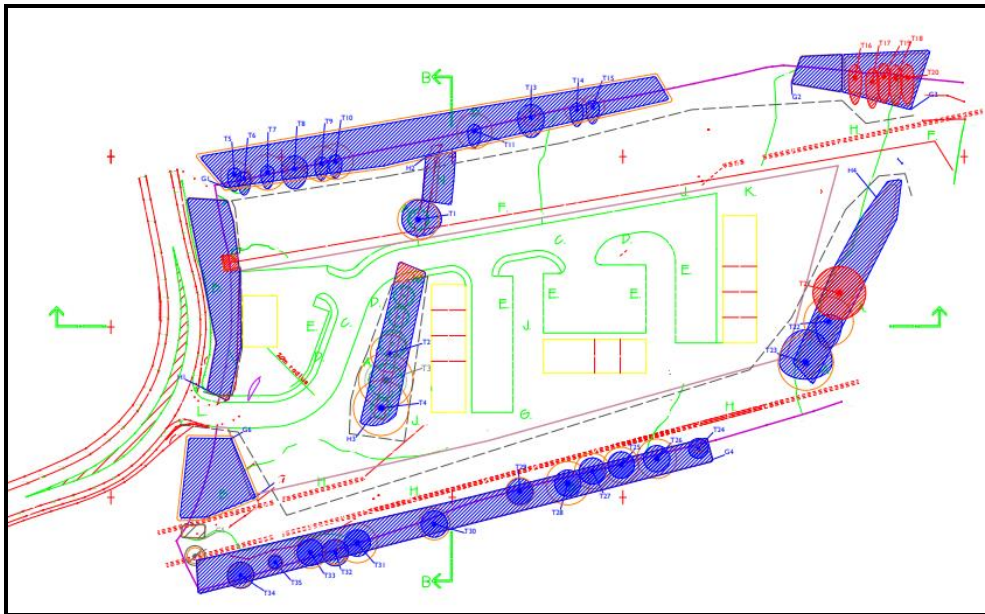
- 4.1.14 Policy EQ4 is a specific Policy set out in the LDP that aims to protect the “*priority species, habitats and features of recognised principal importance to the conservation of biodiversity and nature conservation*”. It should be noted that the application is accompanied by a Preliminary Ecological Assessment and Tree Survey Report. For development proposals to be permitted they must accord, where relevant, to 2 Criteria. Taking into account the nature and form of the application proposal, it is considered that 1 is of relevance to the proposed development and an assessment of the application proposal against it now follows:

- 4.1.15 Criterion a) states that the impacts of development on biodiversity must be satisfactorily mitigated, acceptably minimised or appropriately managed to include net enhancements. The proposed development will retain the majority of the existing trees that both border and lie within the site. This is in line with an Ecological Appraisal Report, which found no signs of European protected species within the site boundary and a Tree Survey found that there are no TPOs on the site or its perimeter, or any category A trees with high retention value.
- 4.1.16 The retention of existing trees and hedgerows allows for the continued use of them by bats and birds, whilst any trees that are required to be felled will be replaced with whips of oak and sycamore, which would form part of a detailed landscaping scheme prepared and submitted as part of a future Reserved Matters application. There is also sufficient space within the site for the future enhancement of biodiversity, through measures such as native tree planting.
- 4.1.17 The proposal will also ensure that there is no detrimental impact to the area of marshy grassland that adjoins the site, but does not form part of the application
- 4.1.18 Therefore, in view of the above, it can be considered that the requirements of Policy EQ4 are satisfied.

Policy EQ5 - Corridors, Networks and Features of Distinctiveness

- 4.1.19 Policy EQ5 reflects the contribution that linear or continuous features or independent elements, make to the landscape and its distinctive character. For development proposals to be permitted they must accord, where relevant, to 2 Criteria. Taking into account the nature and form of the application proposal, it is considered that 2 are of relevance to the proposed development and an assessment of the application proposal against each now follows:
- 4.1.20 Criterion a) states that proposals for development should not adversely affect those features which contribute local distinctiveness/qualities, and to the management

and/or development of ecological networks, accessible green corridors and their continuity and integrity. As the hedge-banks, riparian corridor that are located on the site were found to have high local value, their retention creates a distinctive linear feature to the environment. Plan H below, shows the trees retained hatched blue, and the trees deemed unstable hatched red.



**Plan H**

- 4.1.21 The above therefore follows the recommendations of the accompanying Preliminary Ecological Assessment, the development will not adversely impact any distinctive ecological networks on site or in the wider area.
- 4.1.22 Criterion b) states that proposals which include provision for the retention and appropriate management of such features will be supported. The development proposes the retention of most of the tree line that runs through the site, as well as the perimeter vegetation that borders the site. The application has also considered the protection of the area of marshy grassland adjoining the site, so that it remains unimpacted by the development. As a result, a future Reserved Matters application will include a scheme for their full management.

4.1.23 As a result of the above, the requirements of Policy EQ5 are satisfied.

Policy TR3 – Highways in Developments – Design Considerations

4.1.24 Policy TR3 facilitates the ‘good design’ of highways within developments. Of the 6 criteria of the policy, it can be determined that this development satisfies all of them.

4.1.25 Firstly, criterion a) states that there should be safe pedestrian and cycle routes within and from the site, As detailed above, there will be adequately sized footpaths throughout the site, that allows for safe movement to, from and within the site. There is also an adequate parking provision that creates a safer space for those walking or cycling throughout the site.

4.1.26 Criterion b) states that there will be suitable provision via public transport. The development will provide a road width that satisfies the highways requirements, as well as ample turning space for larger vehicles.

4.1.27 Criterion c) states that there must be appropriate parking and where applicable, servicing space in accordance with required standards. As previously discussed, each unit will be provided with the sufficient number of spaces required for its use.

4.1.28 Criterion d) states that there must be infrastructure and spaces that allow easy access for those with disabilities. As will be discussed in Section 5, where appropriate, the units will provide the adequate disabled access and infrastructure that is in accordance with the criterion.

4.1.29 Criterion e) requires that the visibility and design features are maintained and enhanced. The development proposes a new access road directly off St Clears Road. As detailed in the accompanying Transport Statement, the new access road will be served by sufficient levels of visibility and provide safe access to and from the site for all users.

4.1.30 Finally, criterion f) requires the provision for Sustainable Urban Drainage Systems to allow for the disposal of surface water run-off from the highway. As mentioned, all surface water will be captured and dealt with in line with current surface water regulations, which will include a mix of on-site measures.

4.1.31 In summary, the requirements of all relevant aspects of Policy TR3 are satisfied.

## 5.0 ACCESSIBILITY

### 5.1 ACCESSIBILITY

- 5.1.1 All of the inclusive design issues identified have been addressed wholly in compliance with the requirements of the Disability Rights Commission Code of Practice “Rights of Access: Services and Premises” and Part M of the Building Regulations, where applicable. Thereafter full compliance will be maintained in perpetuity.
- 5.1.2 The proposed development is sited over level to gently sloping ground, with no discernible differences in ground level from the proposed industrial plots to the proposed public highway. The vehicular access road, parking bays and footways will be significantly wide and reasonably level to allow use by all users regardless of mobility.
- 5.1.3 The development proposal will ensure, wherever possible, that the maximum gradient of driveways and footways to building entrances will be as level as possible, but certainly no more than 1:20, and compliant with Part M of the Building Regulations. The development will be provided with non-slip pathways on each unit and laid to a minimum width of 1000mm.
- 5.1.4 The units will be mixed in nature and the following where relevant will apply to all types:
- (a) If individually required, access to an external doorway will be made available via a short, shallow ramp. It is unlikely due to the site topography that handrails will be required as accompanying features on the above ramps. Ramps will be flush with door openings and surrounding ground level wherever possible.
  - (b) Both external doorways will be in compliance with Part M of the Buildings Regulations. The entrances shall be clearly identifiable to all users.
  - (c) All internal doors will be a minimum of 800mm, with corridors to comply with Part M of the Building Regulations.

- (d) Entrance doors will avoid the use of large glass facades, and doors thresholds will be flush. Door handles will be easy to grip in accordance with Part M of the Building Regulations, and similarly door closures will require a minimum use of force.

5.1.5 The proposals therefore ensure ease of access for all.

## **5.2 MOVEMENT TO, FROM AND WITHIN THE DEVELOPMENT**

- 5.2.1 The application site is located at the edge of the urban area with its associated community facilities and local services, many of which are located within walking distance of the site. The remainder then are easily accessible via one of the many regular bus services running in close proximity to the site, as well then as the wider range of community facilities and local services offered by the nearby primary service centres.

## 6.0 CHARACTER

### *Landscape Design*

- 6.1.1 It is considered that the site is currently inconspicuous in the landscape, because of the proximity of the A40 and the railway line with their associated treelines, which both dominate the northern and southern perimeter of the application site, as well as the close proximity of commercial buildings and associated yards to the south east of the site.
- 6.1.2 The selection of photographs contained in this Statement are evidence that the precise location of the application site is one which does lend itself to fit in with the character of the area surrounding the land. The application site is “sandwiched” between significant manufactured structures, being the A40 road, the railway line, and the Cillefwr industrial estate.
- 6.1.3 The general public are not afforded access into the enclosure, as there are no public rights of way crossing nor alongside the field.
- 6.1.4 The development of the site would complement the existing spatial pattern of the settlement, preserving the residential character and setting of the locality through retention of wider perimeter vegetation and landscape features. Therefore, this natural landscape is able to provide wholesale landscaping about the site and continue to naturally obscure views into the site from wider public vantage points on the A40 and St Clears Road. For these reasons, the proposals will not pose any detrimental effect upon the landscape quality of the locality at Llanllwch.

### *Scale*

- 6.1.5 The proposal will deliver 12 industrial B1 and B8 units in a mix of forms.

### *Number*

- 6.1.6 The design objective is to provide a density and form that is representative of the site’s position discussed above, as well as respecting its topographical form. As a result, the proposal is for 12 units.

### *Layout of Development*

- 6.1.7 The layout of the proposed development has been steered by a number of factors including the site's topography, its physical attributes, its means of access and its relationship with adjoining land uses. As a result, the proposal represents a logical layout that is sympathetic to both its immediate and wider setting, whilst also securing a high level of legibility for both occupants of and visitors to the site.

### *Appearance*

- 6.1.8 At this outline stage, the final finishes of the proposed buildings has yet to be established.

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## **COMMUNITY SAFETY**

- 7.1 All proposed units will face the central access road, maximising levels of natural surveillance. In addition, all units will be provided with sufficient off-street parking provision, reducing the conflict with other road users and maximising the level of highway safety for pedestrians.

## 8.0 ENVIRONMENTAL SUSTAINABILITY

### *Landscaping/Townscape Setting*

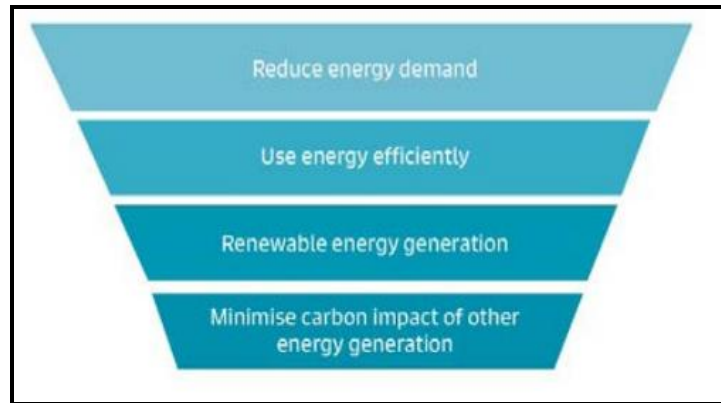
- 8.1 As detailed above, the sensitive design of each of the elements of the application proposal has ensured that the immediate and wider setting of the surrounding land uses are not harmed in any way.

### *Biodiversity and Local Environment*

- 8.2 As detailed on the accompanying drawings and reports, all additional planting used in the landscaping of the proposed development will draw from the indigenous species of the area. Biodiversity enhancement measures will form part of any detail design subject of future Reserved Matters application.

### *Energy Efficiency/Carbon Reduction*

- 8.3 The following measures will be undertaken where possible to maximise energy efficiency and carbon reduction of the buildings themselves and during their construction:
- Maximise use of daylight in key rooms through fenestration
  - Use of local suppliers and labour wherever possible
  - Use local recycled products wherever possible
  - The units will be insulated to current targets
  - All fenestrations will be insulated to current targets.
  - Energy efficient internal and external lighting units will be installed.
- 8.4 The development will adhere to the energy hierarchy in TAN 12, as shown in Figure 3 below, through the use of renewable energy alternatives where appropriate, thus improving the units' carbon footprint.



**Figure 3 – Energy Hierarchy in TAN 12**

*Sustainable Materials*

- 8.5 It is understood that recycled or reclaimed products will be used in the construction of the proposal wherever possible

*Water*

- 8.6 It is understood that a mains supply will be utilised. In line with this, we would propose that the domestic water and heating system of the units be designed to reduce domestic water wastage, through a range of measures including low water consuming fittings in the bathroom and kitchen.

*Waste Management*

- 8.7 It is understood that the buildings have access to commercial recycling facilities.
- 8.8 It is understood that a connection will be made to the public sewer for the disposal of foul waste.

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## 9.0 CONCLUSION

- 9.1 The proposal is for the construction of 12 industrial units and associated infrastructure.
- 9.2 The application proposal relates to the development of an element of a wider strategic development site at Llanllwch, Carmarthen, that forms part of an area of land that is allocated for a mix of uses. The proposed site layout seeks to maximise the 1.15-hectare site area with 12 B1 and B8 storage units that are arranged to prevent any felling of existing trees and conform to the general urban surroundings of the area, particularly the Cillefwr Industrial Estate located to the south east of the site. All existing perimeter and site vegetation will be retained, in accordance with a Tree Survey conducted on the 12th of September 2023.
- 9.3 The proposal, although in outline format at this stage, has been designed to avoid the loss and any impact on key ecological assets of the Applicants wider land holding, whilst also retaining sufficient land within it to increase its biodiversity value as part of any future detailed design solution.
- 9.4 In conclusion therefore, the proposal represents an appropriate and sustainable development that adheres to all relevant current planning policy.