

Statement of Evidence

Site Address: Cwm y Nant, Dafen, Llanelli
Planning Reference(s) / Local Plan Reference(s): Revised Deposit LDP Reference – PrC2/h22 Outline Planning Permission (S/40692) granted in August 2021.
Date: 16/05/24

Purpose of this Statement of Evidence

This Statement of Evidence has been prepared to address issues of deliverability in respect of the development at North Dock, Llanelli, shown edged in red in Appendix 1. The SoCG is intended for submission to the forthcoming Carmarthenshire Revised Local Development Plan (LDP) Examination.

The purpose of this SoCG is to set out a position regarding the proposed allocation of the Site for residential development in the Revised LDP (Allocated Site Ref: PrC2/h22

The content of this SoCG reflects the advanced position of the Site, which was granted an outline planning permission in August 2021. The site is subject to a rigorous assessment by the Local Planning Authority, together with extensive consultation with statutory consultees and the wider community.

The SoCG addresses the following deliverability indicators:

1. The planning status of the site.
2. Any progress being made towards the submission of application(s) required to be granted before development may lawfully commence.
3. Any progress with site assessment work required for an application submission and / or before development may lawfully commence.
4. Any relevant information about financial viability affecting the commencement of development.
5. Any relevant information about site ownership and access constraints affecting site assessment or the commencement of development.
6. Any relevant information about infrastructure provision necessary to support / enable the development.
7. Expected delivery and build-out rates.

1. The planning status of the site

1.1 The site extends over three existing housing land allocations in the adopted Local Development Plan (GA2/h30, GA2/h31 and GA2/33), which also includes additional, privately owned land to the east.

1.2 The subject site of 21.5 acres has been included in the Deposit Revised LDP under site reference Prc2/h22.

1.3 The site has a limited planning history, evidenced by its nature as a greenfield site, which has remained undeveloped for a significant period. Notwithstanding, the following application is considered relevant as it forms part of the site, located on the parcel of public open space adjacent to Bryncoch and Gors-Fach road.

1.4 **S/25729** - Outline application for the proposed residential development of 26 bungalows on land at Y Waun, Penceilogi. Decision: Outline granted. Decision date: 07/06/2013

1.5 Further information on the planning status is outlined below.

2. Any progress being made towards the submission of application(s) required to be granted before development may lawfully commence.

2.1 The outline planning application proposed a residential development of up to 202 dwellings, together with associated access, landscaping, drainage and infrastructure works. A schematic layout plan of the development was submitted with the application and included other detailed drawings. The new homes are set around the site boundaries and roadways with a mixed density, massing, and house types. The outline Planning Permission with reserved matter was granted in August 2021.

3. Any progress with site assessment work required for an application submission and / or before development may lawfully commence.

3.1 Site inspections and survey work have been carried out to prepare the reports required as part of the outline planning application. The following reports were submitted with the planning application and are available to view on the Council's website:

- Preliminary Ecological Appraisal
- Reptile Ecological Appraisal
- Dormouse Survey
- Bat Survey Report
- Phase 1 Environmental Site Assessment
- Arboricultural Report
- Coal Mining Risk Assessment
- Archaeological Desk Based Assessment
- Noise Assessment

- Air Quality Statement
- Desk Based Archaeological Report
- Transport Assessment
- Design and Access Statement
- Drainage Strategy and Water Quality Statement

3.2 Site Assessment work has been undertaken as part of the outline planning application.

4 Any relevant information about financial viability affecting the commencement of development.

4.1 Reference is drawn to the updated Financial Viability Report undertaken by Burrows Hutchinson. .

'It is considered that values in this area of Llanelli will track 5% - 10% below the general tone applicable to most of the other "key sites". The land value is also adversely affected by quite significant allowances in the FVA for "abnormal" site costs, equating to almost £300,000/net hectare. Nevertheless, the FVA indicates that it should be viable for this site to deliver a policy compliant scheme, including the requirement in proposed Policy AHOM1 for 25% of the new dwellings to be affordable homes, at a reduced land value equating to £195,759/net hectare. Bearing in mind the extent of "abnormal" site costs in this instance, it is considered that this level of value is broadly in line with the benchmarks used in the High-Level County-wide Viability Studies'.

5 Any relevant information about site ownership affecting site assessments or the commencement of development.

Access

5.1 Given the size and location of the development site, there are various opportunities to create a highly accessible and permeable site. Potential pedestrian links can be created from the existing residential areas, along Gors-Fach for example. Similarly for vehicular access roads, the site is well placed to utilise the existing road network around Nant-y-Gro and Gors Fach.

5.2 Gated pedestrian access is provided at the site's north-western boundary. A second pedestrian access can be found along Gors Fach at the site's southern boundary which leads to an area of hard-standing, although this has fallen into disrepair in recent months (shown bottom-right). Currently, there is no formal vehicular access to the site, though access is proposed off Dafen Road/Nant Y Gro, at the site's north-western boundary. The site is located in the eastern gateway into Llanelli within proximity to the A4138 road which links the town to the M4. In this regard, the site has excellent strategic highway connectivity. The site lies in close walking distance to several bus stops in Bryncoch and close to Nant Y Gro and Granville Terrace. Various services operate frequently between Llanelli Town Centre and Swansea, including the 110/111, 175 and X90 routes.

5.3 A Transport Statement has previously been prepared by WSP and submitted in support of the outline application. It has been demonstrated that the proposed development would not have a detrimental impact on the surrounding highway network at peak and both junctions around the site are demonstrated to operate within capacity for all modelled scenarios. The Dafen Roundabout would operate over desirable operational thresholds for the 2025 and 2030 horizon years, however the impact of the proposed development traffic would not be severe and on this basis, can be mitigated with soft or hard measures relative to the scale of the development.

Drainage and Flood Risk

5.4 A Drainage Assessment was prepared by WSP and submitted in support of the outline planning application. The most sustainable method for the disposal of foul water discharge from the proposed development site is via the mains sewerage network. The nearest public foul sewer system is located in the housing estate south-west of the development site.

5.5 The connection point proposed as part of the report is between existing manholes SN53001912 & SN53000911.

5.6 The foul water from the proposed development will discharge into the combined sewerage system that exists in the area local to Cwm-y-Nant. Welsh Water have confirmed that the sewerage system has capacity to serve the proposed development.

5.7 The surface water runoff from the proposed development site will discharge into the watercourses on the perimeter of the site with on-site attenuation provision defined in the hydraulic modelling assessment as 2805 m³.

5.8 The following summary is provided, as part of the Drainage Strategy for the proposed development:

5.9 The surface water runoff from the proposed development site will discharge into the watercourses on the perimeter of the site with on-site attenuation provision defined in the hydraulic modelling assessment as 2805 m³.

5.10 The proposed development will need to comply with the SAB's (Sustainable Drainage Approval Body) design guidance and will be required to adopt SuDs within the design.

5.11 The foul water from the proposed development will discharge into the combined sewerage system that exists in the area local to Cwm-y-Nant. Welsh Water have confirmed that the sewerage system has capacity to serve the proposed development.

5.12 Policy INF4 has been acknowledged and considered, as part of the Drainage Strategy. Surface water removal or "betterment" will be achieved; surface water will be removed from the combined sewer at the donor sites to the north-east of the site. To achieve this, the runoff from approximately 1735 m² of impermeable area is to be diverted from the combined system into an existing surface water system. The exact area that will be diverted should be confirmed through a detailed survey.

Air Quality

5.13 Based on assessment undertaken at outline stage, it is considered that air quality does not pose a constraint to redevelopment of the Site as proposed.

Noise

5.14 The report prepared by WSP has shown that the Site falls within Category A of TAN 11 and that any effects of noise can be adequately mitigated via standard measures which would include standard façade treatments and, in the case of dwellings in the north-west corner, suitable locating of external amenity spaces. For sites exposed to road traffic noise within Category A, TAN 11 suggests: be considered as a determining factor in granting planning permission. In view of the above, the development proposal is considered to be compliant with relevant local and national policies on noise. Under these circumstances noise levels would not comprise a potential reason for refusal.

Ecology

5.15 The Site at Cwm Y Nant comprised grassland habitats consisting of marsh, poor semi-improved and semi-improved neutral fields. The fields were bordered by mature broad-leaved woodland, dense scrub and dry and wet ditches.

5.16 The wet ditches on Site were assessed as not suitable for supporting great crested newt or water vole. No other water bodies were identified on Site or within 250 m of the Site.

5.17 Presence of badger within the Site and wider area was recorded, including four outlier sett entrances on the Site boundaries. Exclusion zones should be employed to avoid disturbance to these setts during construction works. If this is not possible then the setts must be excluded and closed under licence, which would also have further survey requirements.

5.18 Twenty-one trees on Site were identified as being suitable for roosting bats. Further surveys have been recommended should these trees be affected by the Proposed Development. Tree corridors that may be used by commuting/foraging bats should be retained where possible or reinstated in the landscaping plans for the Proposed Development.

5.19 Trees and scrub on Site provide suitable habitat for hazel dormouse and breeding birds. All small areas of vegetation clearance should be undertaken outside of the breeding bird season and be subject to a check by a suitably qualified ecologist. Mitigation measures are recommended should a bird or dormouse nest be found. Dormouse surveys would be required if vegetation clearance is likely to be significant.

5.20 Grasslands, scrub and woodland edges provide suitable habitat for reptiles. A targeted reptile survey is recommended to assess whether reptiles are present or likely absent from the Site. Invasive non-native plant species were recorded on the Site with Japanese knotweed recorded throughout much of the Site. Recommendations have been made for the removal and control of these species.

5.21 Ecological enhancements are recommended, such as incorporation of a sensitive lighting scheme, retention/reinstatement of woodland corridors and species-diverse grassland and nest box installation in order to increase the value of the Site for biodiversity.

5.22 Recommendations in this report for further survey and/or mitigation requirements should be revised as detailed designs become available in order for the Proposed Development at Cwm Y Nant to comply with biodiversity legislation and planning policy. Please see NRW response below:

Natural Resource Wales Response

5.23 A response to planning application S/40692 from NRW dated 19.08.20 is shown in Appendix 2.

Highways Response

5.24 A response to the planning application S/40692 from Carmarthenshire Highways and Transport, dated 16/07/21 is shown in appendix 2.

Dwr Cymru Welsh Water Response

5.25 A response to the planning application S/40692 from Dwr Cymru Welsh Water, dated 19/04/21 is shown in appendix 2

Archaeology and Heritage

5.26 At outline stage an Archaeological and Heritage Assessment was prepared by Archaeology Wales. No Registered Historic Landscapes or Listed Historic Parks & Gardens will be directly or indirectly (visually) affected by the proposed development. Only one Scheduled Monument could potentially be indirectly (visually) affected by the proposed development which is St David's Colliery (CM265). The extent of visibility of the proposed development from this monument was unclear, however as the development is adjoining an existing housing development it unlikely to reduce the quality of the monuments current setting. No listed buildings will be directly or indirectly (visually) affected by the proposed development. Local topographic features will serve to eliminate any adverse impact on these assets. The desk-based research identified that the proposed scheme is situated within a landscape of low archaeological potential with the exception of post-medieval agricultural and coal mining activity. This activity is a distinctive feature of the local area, but no visible remains of coal mining activity were identified within the area of proposed development, including feature CYN002. The effect on these potential remains is 'Minor'. The Farm at Cwm-y-Nant is of 'Low' value however without details of the proposed development we can assume this site will be entirely lost so the impact is considered 'Major'. It is difficult to assess the magnitude of the impact on the historic hedgerows as many residential developments respect the existing hedgerows as part of the design, however these will need to be taken into consideration as part of the work.

Arboriculture

5.27 This site has potential to accommodate development whilst retaining the trees of value. The significant trees on or adjacent to this site should be given due consideration in the development design process. If the health and stability of the trees are maintained, and the following strategies implemented: a suitable development design; tree protection methods; Arboricultural site supervision and tree after care, the process of construction could be conducted with no adverse impact on the important trees upon or adjacent to this site.

Ownership

5.28 The freehold of the land is owned by Carmarthenshire County Council.

Transport Assessment

5.29 There are no access constraints that would affect the development of the site. A Transport Assessment has been carried out, which contains the following summary:

5.30 The main vehicular access point to the site will be to the east of the site from Nant-y-Gro. This access will be in the form of a simple priority 'T' junction. An additional vehicle access may potentially be available from Gors-Fach to the south of the site. Pedestrian links will be provided throughout the site.

5.31 An assessment has been made of the proposed development site in relation to the accessibility of sustainable modes of transport. The site can be accessed by several bus services which provide access to Llanelli town centre and the surrounding residential areas. Llanelli railway station is also within comfortable cycling distance of the site and provides access to important regional destinations such as Swansea and Cardiff. The pedestrian infrastructure in the vicinity of the site is of a good standard and there are several cycle routes serving Llanelli.

5.32 Parking on the site will predominately be provided through on street and on plot provision. The parking provision at the site will be of a suitable provision to ensure there is no overspill of parking onto the surrounding highway network. The parking provided at the Cwm-y-Nant development would be in compliance with the CSS Wales Parking Standards 2014.

5.33 An assessment has been undertaken of the car trips generated by the proposed development. The development is anticipated to generate 124 trips in the AM Peak and 117 trips in the PM Peak. The detailed junction capacity analysis undertaken as part of the report shows that the development will not have a severe impact on the three assessed junctions. The two priority junctions are expected to operate within capacity; however, the Dafen Roundabout would exceed operational capacity for the AM peak in particular in the 2025 and 2030 horizon years.

5.34 It is the view of this TA that, in highway and transportation terms, the proposed development of Cwm-y-Nant will not have a significant impact on the operation of the surrounding highway network. Any impacts of the development could be mitigated through Travel Planning measures and contributions to mitigation schemes at appropriate junctions.

Utilities

5.35 The site lies adjacent to existing development where utility services are readily available or can be provided.

Impact on the Community/Welsh Language

5.36 A scheme at this location will provide a range and choice of house types and tenures, including affordable elements. It is not considered that the development of the site for housing will have any significant adverse impact upon the Welsh language or any local communities.

Coal Mining Risk

5.37 Given the location and history of the site and surrounding area, the risk of existing coal mining legacies on site should be taken into account. Following the completion of a desk-based assessment, there is one recorded mine entry (shaft) within the site, with a further six within close proximity outside the site boundary. The mine shaft on site is located within an area that is currently public amenity grassland. This will require a 15m exclusion zone/offset to be designed into the scheme.

5.38 As well as mine shafts, the site layout and areas of construction also needed to take into account the possibility of coal out-crops. These areas may require drilling and grouting to ensure that construction can take place in these areas.

Phase 1 Environmental Site Assessment

5.39 The site has a history of coal mining, potentially infilled land and limited residential development. The historical coal mining could give rise to contaminated land issues if the Site was developed in the future. Based on the information contained within the report it is the opinion of WSP that the Site represents a low to moderate risk with respect to potential contaminated land liability issues.

5.40 It is recommended that a comprehensive ground investigation be undertaken on Site. This investigation should assess the geo-environmental and geotechnical characteristics of the strata beneath the Site, address any potential contaminated land and historical coal mining issues, and inform any follow-up work and structural design for the proposed development.

Landscaping and Biodiversity

5.41 The masterplan for the site has considered the importance of landscaping, both in terms of the visual amenity of the proposed development and in terms of the constraints relating to retained trees and hedgerows, as well as the needs for SuDS, play space and public open space.

Adjoining Privately Owned Land

5.42 Initial discussions have taken place with the adjoining landowner and their agent. The masterplan of the Council owned land includes access points to the adjoining land. Further discussions to formalise access agreements will take place in due course.

6. The landowner's delivery intentions and anticipated start and build-out rates:

6.1 The table below shows the Deposit plan's Housing Trajectory set out in Appendix 7 of the Deposit Plan:

Estimated Completions	2025-26	2026-27	2027-28	2028-29	2029-30
Number of Dwellings	40	40	40	40	42

6.2 Based on the progress that has been made to date, it can be confirm that the site will be developed within the timescales set out above, with the Council owned land being delivered in the first phases.

Deliverability Assessment

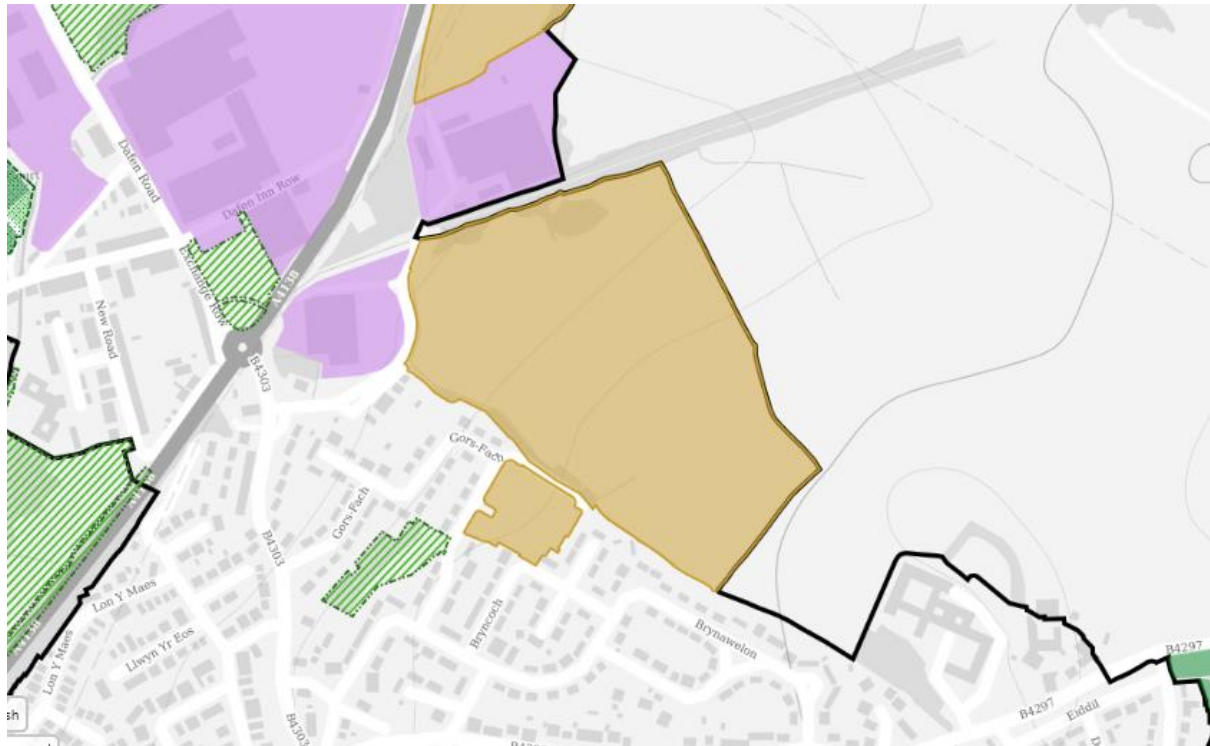
6.3 It has been established that the site is situated in a sustainable location, being within close distance to essential services and facilities, and public transport links.

6.4 Furthermore, it has been demonstrated that the masterplan for the site has taken into consideration the important opportunities and constraints of the site. This has evolved into a site layout that will create a sense of place for residents and link effectively with existing residential development around the site, as well as potential future residential development adjacent.

6.5 Considering the above, it is concluded that the proposal fully accords with both national and local policies and there are no material considerations which should prevent the planning application from being determined in accordance with the relevant planning policy framework. The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.

6.6 The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

Appendix 1 – Location Plan of the allocation site



Appendix 2 –

Consultation Responses from NRW, DCWW & Highways in respect of Planning Application S/40692

Carmarthenshire Planning services,
Civic Offices,
Crescent Road,
Llandeilo,
SA19 6HW

ebost/email:
swplanning@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 65 3091

19/08/2020

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: PROPOSED CONSTRUCTION OF UP TO 202 UNITS WITH ASSOCIATED LANDSCAPING AND INFRASTRUCTURE WORKS

LLEOLIAD / LOCATION: CWM Y NANT (LAND NORTH OF GORS FACH), DAFEN, LLANELLI, SA14 8NB

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales with additional information about the above, which we received on 12/08/2020.

We have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if you attach the following conditions to the permission.

Condition 1: No development, including site clearance, shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

Condition 2: No development shall be carried out within a minimum 3 metre buffer zone from any watercourse on site. The buffer zone should restrict: storage of spoil, stored materials, plant and machinery, lighting, structures and any built development including domestic gardens or formal landscaping. The buffer zone shall be applied throughout construction and operation.

European Protected Species

We have reviewed the following additional submitted information:

- 'Cwm-y-Nant Dormouse Survey Report' Prepared by WSP dated December 2019.

Dormice

We consider that the dormouse survey report indicating likely absence of dormice from site satisfies our requirement for further information. We are therefore able to remove our significant concerns on the basis of the new information provided, and believe that it suffices to demonstrate that the proposal will not be detrimental to the maintenance of the favourable conservation status of dormice.

Please note, our comments made previously are still valid and repeated below for your convenience.

Bats

We note that further to the results of the PEA, trees on site have been subject to ground level inspections for potential to support roosting bats, and for those identified as having PRFs, two climbing surveys (one each in August and September 2019). We note the results of the surveys and have no further comments to make.

Great Crested Newts

We note the results of the PEA in respect of GCN and have no further comment.

Water Voles

We note that no evidence of water voles was found in connection with the ditches on site, although the species is known to be present at several locations west of the site.

Protected Sites

The site lies within 2.5km of the Carmarthen Bay and Estuaries Special Area of Conservation (SAC) and the Burry Inlet and Loughor Estuary Special Protection Area (SPA), Ramsar and Site of Special Scientific Interest (SSSI). There are several watercourses on and bordering the site which may provide a hydrological link to the above protected sites via the Afon Dafen.

There is a requirement to assess any potential impacts under the Conservation of Habitats and Species Regulations 2017. Regulation 63 of the Regulations requires the Local Authority, as the competent authority to undertake a test of the likely significant effects of the proposal on the SAC.

If it cannot be demonstrated that there will not be a significant effect, either alone or in combination with other plans and projects, the Local Authority are required to undertake an appropriate assessment of the implications of the proposed scheme for the SAC in view of its conservation objectives, before granting planning permission.

Water Quality – Pollution Prevention

Given the sensitivity of the site, with the hydrological link to designated sites, all appropriate pollution control measures must be adopted on site during site clearance and construction to ensure the integrity of controlled waters.

The applicant should produce a Construction Environmental Management Plan (CEMP) detailing all necessary pollution prevention measures for the development. We are satisfied that this aspect can be included as a condition on any permission issued however, your Authority may require this information prior to determination to inform the test of likely significant effect.

The CEMP should include:

- Construction methods including details of materials, waste, contaminated land.
- General Site Management: construction programme, site clearance requirements, construction drainage, site set-up plan detailing sensitive receptors and buffers zones, relevant protection measures e.g. fencing.
- Biodiversity Management: tree and hedgerow protection, invasive species management.
- Soil management: topsoil strip, storage and amelioration for re-use.
- Control of Nuisances: restrictions on timing/duration/frequency of works, dust control measures, control of light spill and conservation of dark skies.
- Resource Management: fuel and chemical storage, waste management, water consumption, energy consumption.
- Traffic Management: deliveries, plant on site, wheel washing facilities.
- Pollution Prevention: demonstrate compliance with relevant Guidelines for Pollution Prevention, incident response plan, site drainage plan.
- Details of the persons/bodies responsible for activities associated with the CEMP and emergency contact details.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Watercourses

We note that there are several watercourses bordering the site and one that traverses the south-east corner. These watercourses should be incorporated into the design of the proposed development and protected both during construction and operation of the development. We advise that an adequate buffer zone is retained along the length of these watercourses, where no built development including domestic gardens and formal landscaping, is permitted.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is

published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Lindy Marshall

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales

Carmarthenshire County Council
7-8 Spilman Street
Carmarthen
Carmarthenshire
SA31 1JY

Date: 19/04/2021
Our Ref: PLA0056223
Your Ref: S/40692

Dear Sir

Grid Ref: SN532008 253415 200939

Site: Cwm Y Nant, Dafen, Llanelli

Development: Proposed construction of up to 202 units with associated landscaping and infrastructure works.

We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development.

We would request that if you are minded to grant Planning Consent for the above development that the **Conditions and Advisory Notes** listed below are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets.

SEWERAGE

Conditions

No development shall commence until a drainage scheme for the site has been submitted to and approved in writing by the local planning authority. The scheme shall provide for the disposal of foul, surface and land water, and include an assessment of the potential to dispose of surface and land water by sustainable means. Thereafter the scheme shall be implemented in accordance with the approved details prior to the occupation of the development and no further foul water, surface water and land drainage shall be allowed to connect directly or indirectly with the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

No development shall commence until a surface water removal strategy delivering sufficient compensation for the foul flows from the proposed development site, must be submitted to and approved in writing by the Local Planning Authority. Thereafter no dwelling hereby approved shall be occupied until the approved surface water removal strategy has been implemented in accordance with the approved details and written confirmation of this must be received by the Local Planning Authority.

Reason: To prevent hydraulic overloading of the public sewerage system and pollution of the water environment.

The proposed development site is crossed by a public sewer with the approximate position being marked on the attached Statutory Public Sewer Record. The position shall be accurately located, marked out on site before works commence and no operational development shall be carried out within 3 metres either side of the centreline of the public sewer.

Reason: To protect the integrity of the public sewer and avoid damage thereto protect the health and safety of existing residents and ensure no pollution of or detriment to the environment

Advisory Notes

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water Industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

The planning permission hereby granted does not extend any rights to carry out any works to the public sewerage or water supply systems without first having obtained the necessary permissions required by the Water industries Act 1991. Any alterations to existing premises resulting in the creation of additional premises or merging of existing premises must also be constructed so that each is separately connected to the Company's water main and can be separately metered. Please contact our new connections team on 0800 917 2652 for further information on water & sewerage connections.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dwr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

SEWERAGE TREATMENT

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site

WATER SUPPLY

Dwr Cymru Welsh Water has no objection to the development

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

If you have any queries please contact the undersigned on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,

Clare Powell
Development Control Officer
Developer Services



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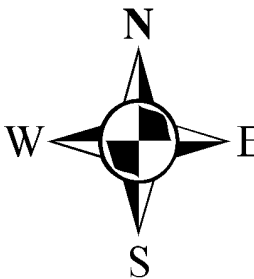
Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.



Dŵr Cymru
Welsh Water

PLA0056223



LEGEND(Representative of most common features)

Waste network:	Foul chamber	Surface water chamber	Surface water
Combined chamber	Combined sewer overflow	Special purpose chamber	Treatment works
Pumping station	Private sewer	Private sewer subject to Sect. 104 adoption agreement	Private Sewer Transfer
NB: Sewer symbol colour indicates the type.	RED - Combined	GREEN - Surface Water	BROWN - Foul
PURPLE - Former S24 sewers (for indicative purposes only)	Outfall	Lamphole	Storm Overflow
Rising main	Gravity sewer	Private sewer	Private sewer subject to Sect. 104 adoption agreement
Private Sewer Transfer	Lateral Drain	Inspection Chamber	

Notes:

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation

Dŵr Cymru (Cyfngreif) (the Company) gives the information as to the position of its underground apparatus by way of general guidance only and on the understanding that it is based on the best information available and no warranty as to its correctness is made upon the event of excavations or other works made in the vicinity of the Company's apparatus. The onus of locating apparatus before carrying out any excavations rests entirely on you. The information which is supplied by the Company is done so in accordance with statutory requirements of sections 199 and 199A of the Water Industry Act 1991 which is based upon the best information available and, in particular, but without prejudice to the generality of the foregoing, it should be noted that the records that are available to the Company may not disclose the existence of a water main, service pipe, sewer, lateral drain or disposal man and any associated apparatus laid before 1 September 1989, or, if they do, the particulars thereof including their position underground may not be accurate. It must be understood that the furnishing of this information is entirely without prejudice to the provision of the New Roads and Street Works Act 1991 and the Company's right to be compensated for any damage to its apparatus.

Service pipes are not generally shown but their presence should be anticipated.

**EXACT LOCATIONS OF ALL APPARATUS
TO BE DETERMINED ON SITE.**

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Map scale: 1:1250
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S/40692

Civic Centre, Llandeilo

S/40692/P051557/(H&T)/GM

16^h July 2021

PROPOSED CONSTRUCTION OF UP TO 202 UNITS WITH ASSOCIATED
LANDSCAPING AND INFRASTRUCTURE WORKS
LAND NORTH OF GORS FACH, DAFEN, LLANELLI, SA14 8NB

I refer to your consultation request on the above planning application and would comment as follows:

Appraisal

The Highways Planning Liaison Team has undertaken a review of the transport and planning related documents submitted for the proposed development.

Comments on the proposal and associated transport related assessments (focusing on the Transport Assessment (TA), subsequent technical analysis and discussions with the applicant and their consultants) are provided below.

Transport submissions in support of the proposed development were prepared by WSP; providing an assessment of the site location, local highway network, accessibility, the development proposals, trip generation and junction capacity analysis. The TA also considers the proposed development within the appropriate planning policy context. The TA concludes that the proposed development of Cwm-y-Nant will not have a significant impact on the operation of the surrounding highway network and that the impacts of the development will be mitigated through Travel Planning measures and schemes.

Proposed Development

The proposal is for the construction of a residential development of up to 202 units, with associated landscaping and infrastructure works. The application is for Outline Planning Permission with all matters reserved. A site masterplan has been provided in support of the application.

The site layout is indicative at this stage and will be confirmed at reserved matters stage. However, the applicant has indicated the following:

- Vehicular parking will be provided at the Cwm-y-Nant development in the form of on and off-street provision, in line with CSS Wales Parking Standards.

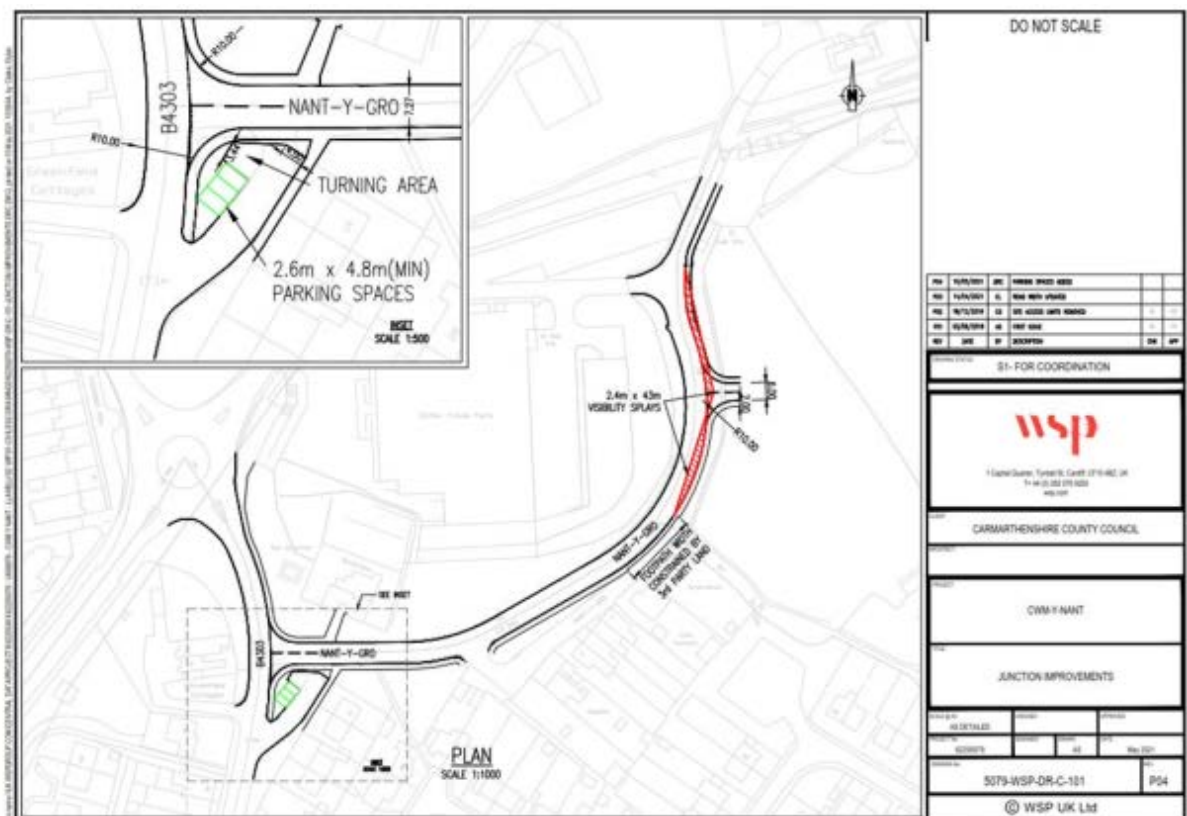
- A suitable condition which requires a holistic scheme for Active Travel provision (both within the site and connecting to surrounding routes) would ensure the development is Active Travel compliant and would provide an element of certainty under the relevant tests.

Highways Planning Liaison recommend that the following elements form part of the Active Travel Scheme for the site in order to maximise opportunities for travel by active modes:

- A shared path link from Gorsfach connecting to the main body of the development site and to Nant-y-Gro.
- Greenways (or similarly appropriate designs) to be provided on site should the tree avenues currently proposed (as shown in the indicative site masterplan) form part of the final site layout.
- A shared path link from the proposed attenuation pond / play area to the A4138 cycle route.
- Provision of footways / shared use path along the north site of Nant-y-Gro; connecting the site to the Dafen Roundabout underpass thus linking with the Llanelli Strategic Cycle Network.

Site Access

The main vehicular access to the site is proposed via Nant-y-Gro to the east of the site (simple priority T junction). Nant-y-Gro connects to the B4303 approximately 65m to the south of the Dafen Roundabout on the A4138. The proposal for the access from Nant-y-Gro is shown below:



between the development site and the wider road network. Three primary routes to/from the proposed development secondary access have been identified. The possible routes run through the residential estate south west of the site and provide access to the B4303 or B4297 (Gelli Road).

Future expansion of the site does not form part of this current application. Nevertheless, three points of potential access are discussed in the TA to serve any future expansion i.e the two accesses discussed above and a third access from the south off Gelli Road via Llys Y Bryn. Whilst this is discussed in the TA it is not proposed due to the expansion not forming part of this current application.

Trip Generation

The site is forecast to generate the following trips during the AM and PM Peak periods:

Period	Arrivals	Departures
AM Peak	33	91
PM Peak	79	38

Up to 80% of development traffic is expected to travel through the Dafen Roundabout. Consequently, an offsite Highways Mitigation Plan in relation to the A4138 / B4303 Roundabout is currently being developed and a condition requiring the plan to be submitted to and approved in writing by the local planning authority, and to the specification of the local highway authority will need to form part of any planning approval for the proposed development. The approved works will need to be implemented in full prior to the beneficial occupation of the development.

Recommendation

Any permission that the Planning Authority may give should include the following condition(s).

1. Prior to its use by vehicular traffic, the new access roads (connecting to Nant-y-Gro and Gors-Fach) shall be laid out and constructed with 5.5 metre carriageways and 1.8 metre footways.
2. Prior to the commencement of development the written approval of the Local Planning Authority shall be obtained for a scheme of parking and turning facilities within the curtilage of the site, and this shall be dedicated to serve the proposal. The approved scheme is to be fully implemented prior to any part of the development being brought into use, and thereafter shall be retained, unobstructed, in perpetuity. In particular, no part of the parking or turning facilities is to be obstructed by non-motorised vehicles.
3. All surface water from the development herewith approved shall be trapped and disposed of so as to ensure that it does not flow on to any part of the public highway.
4. No surface water from the development herewith approved shall be disposed of, or connected into, existing highway surface water drains.
5. Prior to commencement of development a detailed Construction Traffic Management Plan is submitted for the written approval of the Local Planning

Authority and thereafter shall be implemented in full and in accordance with the approved details.

6. As part of any reserved matters application an Active Travel Improvement Plan to support the development herewith approved shall be submitted to and approved in writing by the local planning authority. The approved works shall subsequently be implemented in full prior to the beneficial occupation of the development.
7. Prior to the commencement of development plans showing that no more than 150 residential units shall be served from the proposed primary access point on Nant-y Gro and that no more than 52 residential units shall be served from the secondary access point on Gors-Fach shall be submitted to the Local Planning Authority for approval. The development shall be completed in accordance with the approved details prior to the occupation of any dwelling for the relevant phase of development.
8. Prior to the commencement of development an offsite Highways Mitigation Plan in relation to the A4138 / B4303 Roundabout shall be submitted to and approved in writing by the local planning authority, and to the specification of the local highway authority. The approved works shall subsequently be implemented in full prior to the beneficial occupation of the development.

Reason(s):

To ensure suitable access to the site is provided and in the interests of highway safety.

Other Observations:

1. If the applicant intends to offer the proposed estate road for adoption to the highway Authority under Section 38 of the Highways Act 1980, then he is advised to contact the Authority's Highways Adoptions officer Mr Gary Clarke, at the earliest opportunity.
2. Any amendment or alteration of an existing public highway in connection with a new development shall be undertaken under a Section 278 Agreement of the Highways Act 1980. It is the responsibility of the developer to request the Local Highway Authority to proceed with this agreement and the developer is advised that the total costs of entering into such an agreement, as well as the costs of undertaking any physical works on site, shall be met by him.
3. It is the responsibility of the developer to contact the Streetworks Manager of the Local Highway Authority to apply for a Streetworks Licence before undertaking any works on an existing Public Highway.
4. Where road widening or footway provision is required by the Local Highway Authority, the interests of the landowner are best served by such areas being dedicated to the Local Highway Authority.
5. The applicant is strongly urged to consider provision of electric car charging points. Further advice can be obtained by contacting the Authority's Transport Planning officer Mr Thomas Evans, at the earliest opportunity.

S G Pilliner.

Head of Highways and Transport
Pennaeth Priffyrdd a Thrafnidiaeth