



JMS PLANNING & DEVELOPMENT

GREEN INFRASTRUCTURE STATEMENT

**IN SUPPORT OF A
FULL PLANNING APPLICATION
FOR RESIDENTIAL DEVELOPMENT AND ASSOCIATED WORKS**

AT

LAND ADJACENT TO CARMARTHENSHIRE LEISURE CENTRE

JOHNSTOWN

CARMARTHENSHIRE

SA31 3NQ



Client: Land adj Carmarthen Leisure Centre, Johnstown

Project: Carmarthenshire County Council

Date: October 2025

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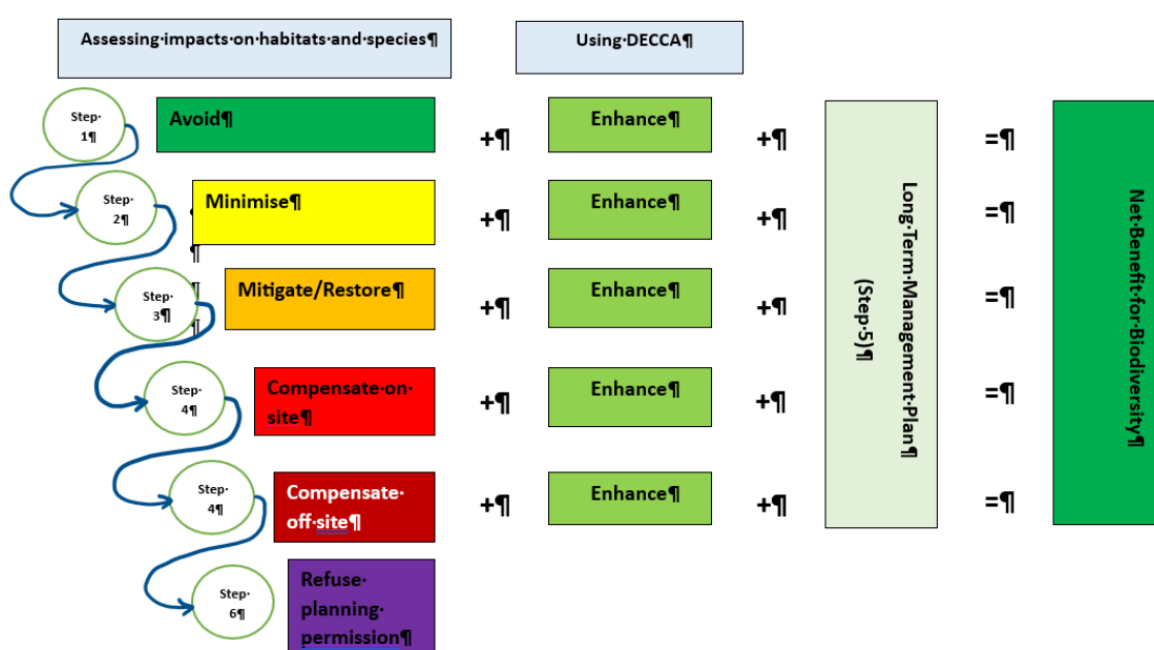
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SECTION 1: INTRODUCTION

- 1.1 JMS Planning & Development have been instructed, on behalf of Carmarthenshire County Council to submit a Green Infrastructure Statement following the publication of Planning Policy Wales (Ed 12), Chapter 6 in February 2024 to accompany the application for the change of use of the site to dwelling houses, flats, offices and associated works.
- 1.2 The step-wise approach has been used throughout this assessment.

Figure 1X: Summary of the Step-Wise Approach



The Step-Wise Approach



SECTION 2: SITE AND SURROUNDING AREA

- 2.1 The application site lies within the settlement boundary of Carmarthen. Carmarthen is identified as one of the main urban centres of the County (along with Llanelli and Ammanford). Carmarthen is therefore considered a Growth Area for the County during the Local Development Plan (the Plan) period. Carmarthen also includes Abergwili, Llangunnor, Johnstown and Trevaughan – of which, the site lies within Johnstown. During the Plan period, the majority of development will be directed to the three Growth Areas with further development opportunities distributed proportionately to settlements lower down the hierarchy.
- 2.2 Johnstown is conveniently located to the south-west of Carmarthen Town Centre and can be accessed via either Llansteffan Road or the A40. Therefore, is very accessible and has great connectivity particularly along the south with direct access to the A40 and near the A48. Public transport services also operate regularly within the area, enhancing its suitability as a location for sustainable residential development.
- 2.3 The application site is located adjacent to the existing Carmarthen Leisure Centre, to the east of Llansteffan Road and south of Johnstown. Immediately north of the site are four tennis courts and a car park associated with the Leisure Centre. To the west, directly opposite the site, is a residential development forming the south-eastern edge of a larger housing area.
- 2.4 Under the current Local Development Plan (LDP), the site is designated as Recreational/Open Space. This designation covers the Leisure Centre, the tennis courts, and the adjoining land that comprises the application site. However, in the forthcoming LDP - currently at the Deposit Stage - the designation has been revised: only the existing tennis courts remain classified as Recreational/Open Space, while the application site is now proposed for residential use. Access to the site is via Llansteffan Road.
- 2.5 The site extends to approximately 1.5 hectares and features a relatively level topography. It has previously been levelled, resulting in the ground sitting at a higher elevation than the adjacent tennis courts, car park, and highway. The site currently comprises an open, grassed area which, despite its Recreational/Open Space designation, is not accessible to the public. It is securely enclosed by fencing along all boundaries.
- 2.6 The western and southern boundaries of the site are naturally screened by existing tree cover. To the east lies agricultural land and the River Towy, while to the south are the playing fields used by Johnstown Football Club. A new access point is proposed off Llansteffan Road (B4312) to serve the development of 34 dwellings. Each property will be provided with adequate parking, located either to the front or rear of the dwelling.
- 2.7 The surrounding area comprises a mix of residential dwellings, a primary and secondary school, Carmarthen Leisure Centre with a wide range of facilities, and a ten-pin bowling venue. The site is well integrated into the urban context of Carmarthen and benefits from excellent accessibility. As such, it is evident that the site occupies a highly sustainable location, well suited for residential development.



- 2.8 As noted above, the River Towy lies to the east of the site. However, none of the site lies within Flood Zone 2 or 3 (Rivers and Sea) as shown on the Flood Map for Planning (FMfP). However, a very small portion of the site does lie within Flood Zone 2 (Surface Water and Small Watercourses).
- 2.9 For the avoidance of doubt, the application site does not fall within statutory designated areas such as Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPA), or Special Areas of Conservation (SAC). Additionally, there are no listed buildings in the vicinity that would be adversely impacted by the proposed development.
- 2.10 The table below assesses the site in terms of its features:

Feature	Assessment
Geodiversity (RIGS)	None on application site.
NRW Landscape Characteristic Tywi Valley Area	<p>From Llandovery to Carmarthen, this lowland river meanders on a wide but contained, active flood plain. The River Tywi is both scenically and ecologically outstanding. The alluvial soils have produced a good living for generations of farmers. There is a regular pattern of fields, enclosed by hedgerows with many hedgerow trees. The valley has been used as a transport corridor since prehistoric times. There are a number of historic towns at bridging points and a larger county town, Carmarthen, with associated busy roads and modern expansions.</p> <p>Historically the valley was protected by a string of fortifications, from stone castles to simple mottes and ancient prehistoric hill forts and Roman encampments. In more peaceful times its beauties lured the wealthy gentry who established parklands and mansions overlooking the landscape. The Tywi Valley has attracted artists and poets such as John Dyer.</p> <p>The lower reaches of the river were formerly navigable, and were thus associated with trade, communications and transport. Today the river is celebrated for sports-fishing and is associated with coracle fishing.</p>
Historic Value	Most significant archaeological element(s): Carmarthen castle, Roman Carmarthen - street plan, churches



Feature	Assessment
	Value: Outstanding - a unique landscape in Carmarthenshire with nationally important elements.
Cultural Value (LANDMAP)	Moderate. No World Heritage Sites. Approximately 50% of people in the area speak Welsh. Approximately 57% of people in the area identify as Welsh.
Visual and Sensory	County and market town, on the Tywi at the lowest bridging point on this river. Set in and overlooking the Tywi valley, much of the town is elevated above the flood plain, with the Tywi valley slopes rising to the north of the town. The river is tidal at this point giving a dynamic quality to the setting of this settlement, in addition to the fairly regular flooding. Change detection 2014: various expansion of housing - Pensarn and Starling Park. Value: Moderate Scenically attractive, but lack integrity in places, distinct character but not rare at a national level. Score moderate overall. Score moderate and high against criteria.
Landscape Habitats	Urban area consisting of residential dwellings but also areas of industry. The focus for biodiversity includes the River Twyi and road verges but also gardens and blocks of derelict or unmanaged land. Value: Low
Geological Landscape	Low platform/ terrace-like areas on the N side of the Towy valleys with intense urban development. Includes less developed areas to the W with similar glacial deposit (mainly sand and gravel) and County show ground. Value: Low Area highly modified by urban/industrial development.
Agricultural Land Classification	Combination – Unclassified, 3a and 4



SECTION 3: GREEN INFRASTRUCTURE

- 3.1 Green infrastructure is necessary not just to soften the impact that development has on our natural environment, but to ensure that it contributes a biodiversity net gain that results in an enhancement of the site compared to the pre-development baseline.
- 3.2 Ensuring that there is a suitable network of green infrastructure is a key concern as it will benefit current and future residents.
- 3.3 Green infrastructure must consider the local context and character as taking design cues from local habitat types while also serving local community needs.
- 3.4 Green infrastructure must deliver public benefits for all both directly and indirectly, including recreational and health and wellbeing benefits.
- 3.5 The site is currently a vacant greenfield, free from any significant built structures or infrastructure. The application site is located adjacent to the existing Carmarthen Leisure Centre, to the east of Llansteffan Road and south of Johnstown. Immediately north of the site are four tennis courts and a car park associated with the Leisure Centre. To the west, directly opposite the site, is a residential development forming the south-eastern edge of a larger housing area.
- 3.6 Johnstown benefits from green spaces along with sport and recreational facilities. These are located directly adjacent to the site within the Carmarthen Leisure Centre and within Johnstown. Additionally, a Public Right of Way (PRoW) footpath (Reference 61/10/6) runs along the eastern boundary of the site, connecting land to the south with areas to the north-east. The footpath will remain in place and will not be affected by the proposed development. Its retention enhances pedestrian connectivity and further integrates the site with the surrounding area. Its sustainable location therefore provides the green infrastructure linkages within the vicinity as required by Future Wales.
- 3.7 The area is well serviced by public transport including buses and linking Carmarthen to north and south Wales and further afield. Queen Elizabeth High School is located directly adjacent to Carmarthen Leisure Centre which is a short walk along the existing footpath. School buses are also available to other schools within the area.
- 3.8 All off-street parking will be of permeable hard surfaces.
- 3.9 Amenity spaces will be provided throughout the proposed scheme to cater for the needs of the residents living on site. These will include outdoor sports facilities and children's play areas.
- 3.10 The applicant is committed to improving the overall well-being and health of the community and the environment by enhancing biodiversity on site and encouraging the use of green infrastructure.



SECTION 4: BIODIVERSITY NET BENEFIT

- 4.1 The annexe to the letter by the Chief Planning Officer dated 11th October 2023 explains that:

“Biodiversity underpins the structure and functioning of ecosystems. It is the diversity of living organisms whether at the genetic, species, habitat or ecosystem level. An ecosystem is made up of living organisms, plants, animals and micro-organisms, in conjunction with their non-living environment, air, water, minerals and soil, and all the diverse and complex interactions that take place between them.”

- 4.2 **Extent:** The planning application comprises a full application which is presented with a detailed landscaping plan which includes biodiversity enhancements and additional planting with designated amenity spaces. The applicant understands the need to plan for every individual development proposal to avoid negative impact on existing biodiversity and is committed to maintaining and enhancing biodiversity on the site. As previously noted, the site is currently greenfield consisting of previously infilled land used from the previous adjacent development. Therefore, the site only benefits from grass currently. The boundaries of the site which include trees and hedgerows will remain unaffected whilst additional landscaping and biodiversity enhancements will be planted on site.

- 4.3 **Condition:** The application site comprises of regularly-mown grassland located adjacent to Carmarthen Leisure Centre. The soils are free-draining and there are no watercourses on site. The area comprises improved grassland, poor semi-improved grassland, intact species-poor hedgerow, dense scrub, broad-leaved plantation woodland and coniferous plantation woodland.

The grassland across the site is dominated by common bent, Yorkshire fog and perennial rye-grass. Associated are all agriculturally-favoured species such as daisy, creeping buttercup, common mouse-ear and white clover. There are small patches of semi-improved grassland amongst bramble and trees on a bank on the eastern boundary. These are dominated by cock's-foot and red fescue, with lesser knapweed and nettle. The grassland habitat is of little ecological significance.

The trees along the boundary are to remain unaffected. The proposed development is concluded as it does not present a risk to protected species in the area.

- 4.4 **Connectivity:** Opportunities will arise for the development to be connected to the biodiversity and ecological networks which exists currently in the area – as the surrounding areas, in particular the open countryside beyond the site is rich in biodiversity with numerous ecological networks including connectivity with the River Towy SAC. Additional landscaping within the gardens is proposed along with a bird and bat boxes on properties. The additional landscaping and planting within the site will improve the overall connectivity and enhance the biodiversity offer of the site.

- 4.5 **Adaptation:** Sustaining the habitats and associated species in the longer term will be key, through proper management and securing the green infrastructure already present into the future. The protection of the River Towy is of paramount importance to the developer also.



SECTION 5: PROTECTION OF SITES OF SPECIAL SCIENTIFIC INTEREST

- 5.1 The site does not form part of land within a Site of Special Scientific Interest.



SECTION 6: TREES AND WOODLANDS

- 6.1 The annexe to the letter by the Chief Planning Officer dated 11th October 2023 explains that:

“Trees, hedgerows, groups of trees and areas of woodland are of great importance for biodiversity. They are important connecting habitats for resilient ecological networks and make an essential wider contribution to landscape character, culture, heritage and sense of place, air quality, recreation and local climate moderation. They also play a vital role in tackling the climate emergency by locking up carbon, and can provide shade, shelter and foraging opportunities, wider landscape benefits such as air and diffuse pollution interception, natural flood management, and building materials. The importance of trees, in particular urban trees, in creating distinctive and natural places which deliver health and well-being benefits to communities, now and in the future should be promoted as part of plan making and decision taking. Planning authorities must promote the planting of new trees, hedgerows, groups of trees and areas of woodland as part of new development.”

- 6.2 There are trees on site along the boundary however, no trees are to be impacted as part of the development.
- 6.3 New native species trees are also proposed to be introduced throughout the proposed development as per the landscaping plans accompanying the application.



SECTION 7: CONCLUSION

- 7.1 To conclude, the development of the application site will not result in damage or a negative impact on biodiversity or on the function of existing ecosystems, due to the low ecological value of the current site. The development site has been confirmed within the Preliminary Ecological Assessment to be of low ecological value but nevertheless borders open countryside to the east with mature boundaries and connected to nationally designated sites which will be carefully protected and managed during the course of the construction process and beyond.
- 7.2 The proposed scheme will deliver a net benefit of biodiversity and ecosystem resilience along with green infrastructure measures and planting in line with the step-wise approach and Planning Policy Wales (Ed 12).