

Carmarthenshire Revised  
Local Development Plan  
2018-2033  
Second Deposit Revised LDP  
Submission

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**Land adjacent to Bryndeilog,  
Tywi Avenue, Llandovery**

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April 2023



# Summary

## **Proposal**

Carmarthenshire Second Deposit Revised LDP Submission

## **Location**

Land adjacent to Bryndeilog, Tywi Avenue, Llandovery

## **Date**

April 2023

## **Project Reference**

S20.153

## **Client**

W D Lewis

## **Product of**

Asbri Planning Limited

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## **Prepared by**

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## **Approved by**

Phil Baxter – Director

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# 1. Introduction

- 1.1 This representation has been prepared in relation to Carmarthenshire County Council's consultation on the 'Second Deposit Revised Carmarthenshire Local Development Plan' (2018-2033). The representation is submitted on behalf of W D Lewis in regard to 'Land adjacent to Bryndeilog, Tywi Avenue, Llandovery.
- 1.2 The representation is accompanied by the requisite Representation Form and is submitted to the Authority within the statutory consultation period (by the deadline for representations of 14<sup>th</sup> April 2023).
- 1.3 A submission was made by W D Lewis in regard to land adjacent to Bryndeilog, Tywi Avenue, Llandovery over the course of the preparation of the Revised Carmarthenshire LDP, including most recently, representations to the First Deposit Revised Plan in March 2020. All representations have been made in close liaison with the Authority, with partnership working characterising the positive progression of the proposed allocation through the LDP process. In continuation of this approach, further representations are submitted to the Second Deposit Revised LDP.
- 1.4 It should be noted that this Second Deposit Revised LDP representation is to be followed by the submission of further site/allocation-specific documents (comprising Concept Plan; Development Viability Model and accompanying Viability Statement; and Statement of Common Ground). This has been discussed and agreed with officers.

## **2. Overview**

- 2.1 Within the First Revised Deposit LDP, the site (referred to as 'Land adjacent to Bryndeilog, Tywi Avenue, Llandovery) was allocated for residential use under SeC15/h2 which makes a provision for 8 units during the plan period.
- 2.2 Within the Second Revised Deposit LDP, the site continues to be identified as residential allocation under SeC15/h2 for the same quantum of development.
- 2.3 As per the representation submitted to the First Revised Deposit LDP, the site's inclusion as a residential allocation in the Second Revised Deposit LDP is supported.
- 2.4 In summary, W D Lewis continues to support the Second Deposit Revised Plan on the basis that the Council have accepted the principle of residential use development. W D Lewis looks forward to working in partnership via a Statement of Common Ground with the Council and delivering this site for much needed residential development within the settlement of Llandovery.

### 3. Update/Progress Following Representations to the First Revised Deposit LDP

3.1 W D Lewis are now in the process of commissioning a significant amount of further supporting work to inform the proposed allocation since the previous iteration of the Deposit Plan was published in March 2020.

3.2 The following further site-specific information is to be submitted (in follow up to this Second Deposit Revised LDP representation) to further inform, and allow for a robust site allocation to be included in the Revised LDP:

- Proposed Concept Site Plan
- Updated Ecology Report
- Development Viability Model and Supporting Viability Statement
- Statement of Common Ground

#### **Proposed Concept Site Plan**

3.3 Ongoing work is now being undertaken to develop an outline parameters concept site plan to examine the site characteristics, including topography, views in and out, constraints and opportunities to develop a robust layout to establish development density. The following principles have been identified:

- Residential units will occupy the centre of the site and on the highest levels, benefiting from south and east orientation.
- Main vehicular access onto un-named road linking to A40 via priority junction arrangement.
- Enhance pedestrian and active travel facilities from the site to link into the town to the south.
- Reviewing topography to ensure that sustainable drainage options can be maximised to create biodiversity gain.
- Existing hedgerows and trees are to be retained as much as possible to ensure wildlife corridors are maintained and enhanced.

#### **Viability**

3.4 W D Lewis will seek to purchase the Burrows Hutchinson viability assessment model and commission an independent viability study. The completed DVM and supporting Viability Statement will be submitted to the LPA.

## 4. Second Revised Deposit LDP – Integrated Sustainability Appraisal (February 2023)

4.1 The Integrated Sustainability Appraisal (February 2023) undertaken by the Authority in relation to the Second Revised Deposit LDP indicates that the residential allocation at land adjacent to Bryndeilog, Tywi Avenue performs well against the defined sustainability criteria, with a number of ‘positive’ and ‘very positive’ outcomes identified (as shown in the extract from the ISA Report below).

*Figure 1: ISA Summary – land adjacent to Bryndeilog, Tywi Avenue (SeC15/h2)*

Site Ref	Name	ISA1	ISA2	ISA3	ISA4	ISA5	ISA6	ISA7	ISA8	ISA9	ISA10	ISA11	ISA12	ISA13	ISA14	ISA15
SuV15/h2	Tir ger Bryndeilog, Rhodfa Tywi	+	-	+/-	+	--	+/-	--	0	+/-	++	+	+	+	+	++

4.2 It is the case that a ‘negative’ outcome is identified in relation to ISA 2 (Biodiversity), ISA 5 (Water) and ISA 7 (Soil). It is noted that all greenfield allocations perform negatively against the ISA 2 and ISA 7 criteria.

4.3 In regard to biodiversity matters, an updated Extended Phase 1 Habitat survey was undertaken in March 2020, which identified a limited range of habitat types predominantly dominated by a grazed improved grassland field that is part of a large field that extends to the north west, which is bordered by species poor hedgerows, a treeline, woodland corridors and a coppiced hedgerow. In terms of the ecological importance of the site the large improved grassland pastoral field was of low intrinsic ecological value and represented the most suitable area of the site to support any future proposed developments. The species rich & poor hedgerows, treeline, broadleaf woodland corridors and marshy grassland/bracken were considered to be of ecological interest on a local context and were likely to be utilised by a variety of species such as birds, foraging & commuting mammals, and potentially small isolated population of reptiles. The broadleaf woodland corridors, hedgerows and treeline should be retained as any future planning applications where practicable and retained as dark wildlife corridors for commuting mammals and birds. As part of the local green infrastructure (GI) network, these features are to be retained as far as possible and kept as part of the development so as to maintain habitat connectivity and provide wildlife corridors to allow for continued movement of mammals such as foraging bats, badger and hedgehog around and through the site.

4.4 Opportunities for local biodiversity enhancement also exist at the site. Hedgerows can be strengthened with new native scrub/tree planting or with species of a known benefit to biodiversity. Other enhancement measures could include the inclusion of bat and bird boxes onto new dwellings and retained trees; the creation of 130mm x 130mm gaps at the bottom of any garden and boundary fencing as to allow continued connectivity through the candidate site for hedgehogs and other small mammals; and the use of native species in any soft landscaping scheme and the management of retained grassland so as to enhance the habitat for local birds and invertebrates.

4.5 It is noted that the site lies in proximity to the River Towy SAC and possesses an offsite ephemeral ditch within the north eastern broadleaf woodland which may provide a hydrological connection to the SAC. As such any future development would require a Construction Environmental Management Plan (CEMP) to limit/mitigate any runoff or drainage issues caused by the construction activities, so as not to pollute the River Towy SAC.

## 5. Consideration of Tests of Soundness

5.1 It is considered that the Second Revised Deposit Plan meets the three Tests of Soundness, which must be satisfied in order for a development plan to be considered 'sound' and able to be recommended for adoption.

5.2 The proposals for the Bryndeilog, Tywi Avenue site are in conformity with the three Tests of Soundness as discussed below in the context of the site and the proposals involved.

*Does the Plan Fit? (i.e. is it consistent with other plans?)*

5.3 The proposals are compatible with the National Development Framework, and particularly 'Policy 24 – Regional Centres' which states that identified towns in Mid and South-West Wales, will be the focus for managed growth, reflecting their important sub-regional functions. Regional and local development plans should recognise the roles of these settlements.

*Is the Plan appropriate? (i.e. is it appropriate for the area in the light of evidence?)*

5.4 The proposals have been derived from evidence submitted with the earlier Candidate Site together with previous engagement with the Council and earlier evidence which formed part of the adopted LDP evidence base which is still relevant.

*Will the Plan deliver? (i.e. is it likely to be effective?)*

5.5 W D Lewis have firm interest from various 3<sup>rd</sup> parties to develop the site in a single phase over the initial part of the plan period.

5.6 In summary:

- The Second Revised Deposit LDP policy and allocation relating to Site SeC15/h2 is founded on robust evidence and provides an appropriate planning framework to deliver modest new homes within the context of the town of Llandovery where new development has been limited over the recent past, in accordance with the overarching vision and objectives of the Plan, as part of a development to come forward over the Plan period.
- The policy and allocation allows for the controlled and sustainable development of the site and is supported by a detailed technical review of relevant settlement boundaries and landscape characteristics, as well as of the individual opportunities and constraints relating to the site.
- W D Lewis consider that the Second Revised Deposit LDP is sound and entirely appropriate in so far as it relates to the site. The proposals for the site are consistent with LDP policy, and capable of delivering a financially viable, sustainable form of development.
- Such a development is considered to accord with the requirements of the Well-being of Future Generations (Wales) Act 2015, and provides an opportunity to contribute towards delivering economic, social, and environmental improvement.



## **6. Conclusion**

- 6.1 This Second Revised Deposit Plan submission document has been prepared in order to accompany the Representation Form completed in respect of land adjacent to Bryndeilog, Tywi Avenue, Llandovery. It is submitted on behalf of W D Lewis.
- 6.2 The proposed residential land allocation under Policy SeC15/h2 which provides for a modest scale of new residential development, is supported, as is the overall soundness of the Plan.
- 6.3 This Second Revised Deposit Plan submission fully supports the proposed allocation.
- 6.4 The submission of further site/allocation-specific documents, comprising Concept site plan; Updated Ecological Assessment, Development Viability Model and accompanying Viability Statement; and Statement of Common Ground, is to follow this overarching representation of support on the Second Revised Deposit Plan, which will further detail and reinforce the viability of the proposed allocation.
- 6.5 W D Lewis looks forward to working in partnership with the Council on a Statement of Common Ground, so that the site allocation can be developed aligned with the aspirations of both parties.