

CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN 2018-2033

CANDIDATE SITE SUBMISSION 11

PROPOSED RESIDENTIAL ALLOCATION ON LAND OFF CEFNEITHIN ROAD,
GORSLAS, CARMARTHENSHIRE.

MANNOR HOMES LTD.

CONTEXT DOCUMENT

A site of 17.5 acres, largely overgrown and with a covering of large areas of scrub, self seeded saplings and undergrowth, but with some 2.4 acres centrally located on its northern (roadside), boundary occupied by an established scrap metal and breaker's yard. That northern boundary follows the line of Cefneithin Road, which for its greater part is fronted by established residential properties, and also the entrance to a major comprehensive school. There is a fall in levels across the site from north to south, being the shallow, western valley slope of the Gwendraeth Fawr which meanders along the site's southern boundary.

The Local Planning Authority have not previously questioned the sustainability of the site's location, and Gorslas in itself is a bustling community, effectively extending from Cross Hands (immediately to the south), but with its own identity. Extensive employment, retail and social activities are within cycling/walking distance, as are the local primary and comprehensive schools and local playground, whilst a number of local bus routes traverse Cefneithin Road and Cross Hands Road. The extant Development Plan identifies Gorslas as part of the Ammanford and Cross Hands Growth Area and the potential to accommodate growth is reflected in the Plan's housing allocation of over 340 new dwellings in Gorslas and Cross Hands during the 2006- 2021 plan period. The majority of this allocation having been taken up.

Historically (since the 1960's), and sited as it is in close proximity to an exclusively residential area containing both a primary school and the entrance to a secondary school, the presence of a large scrap metal and breaker's yard, its appearance (when in full operation stockpiles of scrap were clearly visible from the A48), noise, dust (see accompanying Geotechnical Report), and the numbers and type of vehicles it generates (see accompanying Transport Statement) has been an intrusive element for residents and a source of concern.

It is valued in the trade as it has an absence of planning conditions relating to hours of operation, working capacity, machinery, height of stockpiles, etc. whilst at its busiest it generated heavy vehicles transporting scrap metals and materials in and out which would queue at times along Cefneithin Road almost to Gorslas Square. With a new road network and additional new housing in place around Cross Hands, a significant number would now be likely to travel past residential properties and the entrances to the new schools.

Residents' antipathy to the scrap metal business was further charged in May 2002 when the yard erupted in a series of small explosions and a major fire raged for nearly a week, closing the A48 for half a day before being extinguished. No matter how well operated there is always the possibility of combustion or pollution with such a potentially volatile facility, and indeed in early 2020 there was a further on site fire.

Environmentally, visually, and in terms simply of public health and safety, the location of the scrap metal yard is not appropriate in close proximity to numbers of residential properties and to local schools. The Local Planning Authority has clearly recognised this in the past, and thus the operational scrap yard site is currently the greater part of an undeveloped 6.2 acres (in single ownership) of a residential allocation identified in the extant Local Development Plan. This land could not have been brought forward for residential development until recently, as the landowner had been unable to secure vacant possession from a long lease to overseas operators. The lease has been retained despite the fact that the operators had not been successful in the British market and had ceased trading, but can be relinquished when either party serves notice.

Undoubtedly there is a business appetite for a local scrap metal facility largely unfettered by planning conditions, and if the current Local Development Plan submission is not successful it is likely that business operations will recommence. Whilst the viability of developing just the 6.2 acres currently allocated for residential development is currently being examined, land remedial costs to enable residential development, coupled with social and development contributions and recognition of ecology interests, currently render the site of questionable viability.

Historically, locationally, and environmentally therefore there is a clear case justifying the allocation of the proposed site for residential development. The Indicative Layout, Drainage Strategy, and Transport Statement forming part of the original Local Development Plan submission in August 2018 have not been challenged and presumably therefore are deemed acceptable in principle. The Site Layout then put forward a proposed development of up to 150 dwellings over 13.22 acres (75.4% of the whole site), whilst in recognition of the identified ecological interests the remaining 4.32 acres (24.6% of the site) , were retained, undeveloped, alongside the periphery of the land and the river.

In the interim, a combination of factors have influenced amendment to that original submission, including;

*an increasing awareness of the significance of the Caeau Mynydd Mawr SAC and general ecological interests.

* changes in working practice in respect of soil treatment, resulting in a reduction in potential decontamination costs.

* an increase in the gross development value of the proposal being brought forward.

Consequently, the proposal has been revised to the provision of up to 120 dwellings on 10.44 acres (60% of the site area), and the retention of 7.1 acres (40% of the site) for its ecological and amenity interest. The majority of the land proposed for development comprises the existing scrapyards (brownfield), and that other land currently allocated for residential development in the extant Local Development Plan. The applicant is prepared to work fully with the Local Authority to safeguard and enhance the proposed 7.1 acres, and if required is prepared to gift it to the Local Authority to ensure its protection.

Nevertheless, the two reasons cited by the Local Planning Authority for not including this land as a residential allocation referred to;

- a) The adverse effect upon ecological interests
- b) A questioning of the site`s deliverability

In February 2020 and in light of the significant environmental and safety improvements that would accrue to residents from removal of the scrapyards, a request was made to the Local Authority that the applicant's retained ecological consultant meet with the Local Authority's ecologist to seek common ground. This was denied as; "... There would be little merit for a meeting at this stage...." If this is such an important site in the County in terms of biodiversity it was assumed that a meeting with the landowner would have been of merit at any stage or time. That attitude was surprising and extremely disappointing, especially in the light of the Revised Local Development Plan Policy NE2 Biodiversity, which requires "Development proposals to maintain and enhance biodiversity in accordance with Section 6 of the Environment (Wales) Act" It is understood that an appropriate level of mitigation measures should be introduced as part of any application for development, and in this case they would be significant - but the Local Authority's ecologist refused to even discuss the likely requirements. What is clear is that clear and appropriate conditions on any development can mitigate and enhance biodiversity interests. The frustration the applicant has felt is in the fact that the Local Authority has declined to discuss this matter until apparently it is almost too late, and the site is formally proposed to be omitted from the residential allocations.

A detailed Biodiversity Appraisal formed part of the original site submission in 2018, identifying ecological issues on the site and proposing appropriate solutions - assuming the presence of all species to be surveyed for - thus demonstrating the applicant's recognition of the site's character. There has been no suggestion that these proposals have even been looked at, and certainly no questioning of the applicant or the retained ecologist. The applicant has no recollection or knowledge of any representative of the Local Authority entering upon the land or undertaking a season long ecological survey before, or in response to the site submission. A full and thorough survey of the whole site for the whole season was undertaken through to November 2020 by the applicant's ecologist, and is being repeated in 2023 so that a completely accurate picture can be produced. It is at that time that the appropriate levels of management, mitigation and/ or compensatory measures can be established, and the feasibility of the appropriate level of development can be established. Given the significant level of environmental enhancement that the local residents would benefit from if the scrap metal and reclamation yard were removed, it would be inappropriate that is established

A further, apparently illogical frustration is that whilst the core of this site is a potentially dangerous brownfield use which is totally inappropriate in a residential setting, the Local Authority does not see fit to utilise it as a residential opportunity, but instead are proposing an incomprehensible situation wherein agricultural pasture, a pleasant greenfield site (PrC3/h18) directly opposite the established entrance to the scrapyards, is newly allocated in the Deposit Plan for 29 dwellings. Quite what the future occupants of these dwellings (along with the many others nearby), will make of the activity, the noise, the smell, and the heavy traffic, should the scrapyards re-open? It is of course normal planning practice to prioritise the re-use of brownfield sites in preference to greenfield, and yet further to the west, also on the opposite flank of Cefneithin Road (PrC3/h12), is also a proposed greenfield site of 12 dwellings.

Finally, the cited matter of doubt over the deliverability is bewildering and of unknown source of origin. The lease to the tenant Sims Group UK Ltd, ended in December 2021, and although they have currently vacated the site they continue to pay rent. As a result, although the original contractual term has ended, the lease continues until either party serves notice

Attached

Candidate Site Location Plan

Indicative Site Layout

Transport Statement

Biodiversity Appraisal, Checklist and Update

Drainage Strategy

Market Valuation

Site Abnormals

Geotechnical Report