

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

**Land adjoining Brynlluan,
Gorslas**

April 2023



Summary

Proposal

Carmarthenshire Second Deposit Revised LDP Submission

Location

Land adjoining Brynlluan, Gorslas, Carmarthenshire

Date

April 2023

Project Reference

S20.162

Client

Morganstone

Product of

Asbri Planning Limited

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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 Morganstone in regard to 'Land adjoining Brynlluan, Gorslas'.
- 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 14th April 2023).
- 1.3 A submission was made in regard to the land adjoining Brynlluan, Gorslas over the course of the preparation of the Revised Carmarthenshire LDP, including most recently, a deposit plan representation concerning proposed allocation of this site in the deposit Revised LDP submitted 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).

2. Overview

- 2.1 Within the First Revised Deposit LDP, the site (referred to as 'Land adjoining Brynlluan, Gorslas') which was allocated for residential use under site reference PrC3/h18 which makes a provision for 29 units during the plan period.
- 2.2 Within the Second Revised Deposit LDP, the site continues to be identified as residential allocation under PrC3/h18 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, Morganstone continue to support the Second Deposit Revised Plan on the basis that the Council have accepted the principle of residential use development. Morganstone 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 Gorslas which forms part of the Ammanford/Cross Hands principal centre.
- 2.5 The client, Morganstone is one of the region's most prominent house builders of open market and affordable dwellings, and this site could be added to their growing number of projects. They have previously worked with the Local Planning Authority to provide high quality dwellings that meet the needs of the community in question. Contractual arrangements are in place between the landowner and Morganstone, in the form of an option agreement, to enable the site's promotion and delivery after successfully completing a planning application.
- 2.6 In terms of housing allocations within the deposit plan under Policy HOM1, there are a number of allocations in Cross Hands which have been built out and completed providing almost 200 dwellings (PrC3/h11, PrC3/h12 and PrC3/h13), whilst another has been developed at the Central Garage allocation in nearby Tumble (PrC3/h29).

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

- 3.1 Morganstone 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:
- Updated Site Plan;
 - Completed Ecology Report;
 - Development Viability Model and Supporting Viability Statement;
 - Statement of Common Ground.
- 3.3 In order to support future representation of the site, an ecological appraisal will need to be completed together with an updated capacity layout.

Viability

- 3.4 Morganstone 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 adjoining Brynlluan, Gorslas 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 adjoining Brynlluan, Gorslas (PrC3/h18)

Site Ref	Name	ISA1	ISA2	ISA3	ISA4	ISA5	ISA6	ISA7	ISA8	ISA9	ISA10	ISA11	ISA12	ISA13	ISA14	ISA15
PrC3/h18	Tir yn ffinio Brynlluan / Land adjoining Brynlluan	+	-	+/-	+	+/-	+	-	0	+/-	++	+	+	+	+	++

- 4.2 It is the case that a 'negative' outcome is identified in relation to ISA 2 (Biodiversity), and ISA 7 (Soil). It is noted that all greenfield allocations perform negatively against the ISA 2 and ISA 7 criteria.
- 4.3 It is understood that there are Welsh Water assets traversing the site. Having said this, it is not considered that this would sterilise the site for future development.
- 4.4 Part of the land is under threat from potential Surface Water Flooding as a result of a small watercourse running through the site. It is considered likely that a suitable site layout and design can be identified which locates highly vulnerable development outside of the area at risk of flooding.
- 4.5 At present, the site does not benefit from vehicular access that could be used for residential development, though it is proposed that access could be achieved onto Cefneithin Road along the southern border of the site.

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 land adjoining Brynlluan, Gorslas 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' as Gorslas, that forms part of the Ammanford/Cross Hands principal centre, along with the other 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 Morganstone are very keen to deliver the site as promised. This is the only housing allocation for Gorslas, therefore encouraging it's delivery will provide a valuable contribution towards housing in the area.

5.6 In summary:

- The Second Revised Deposit LDP policy and allocation relating to site PrC3/h18 is founded on robust evidence and provides an appropriate planning framework to deliver modest new homes within the context of the village of Gorslas where new development has been limited over recent times, in accordance with the overarching vision and objectives of the Plan, as part of a development to come forward over the Plan period. It is imperative that this housing allocation is delivered as it is the sole one within Gorslas for the deposit plan.
- 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.
- Morganstone 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 adjoining Brynlluan in Gorslas. It is submitted on behalf of Morganstone.
- 6.2 The proposed residential land allocation under site reference PrC3/h18 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. Furthermore, the development of other allocations within the deposit plan in nearby areas puts added emphasis on the delivery of this housing allocation. 3 allocations within Cross Hands have been built out recently, whilst another was completed recently in Tumble. This further emphasises that developing this allocation is essential in order to meet the housing need within the area.
- 6.4 The submission of further site/allocation-specific documents, comprising an updated site plan and completed ecological appraisal, 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 Morganstone 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.

Appendix A

Site Location Plan

Appendix B

Site Layout Plan