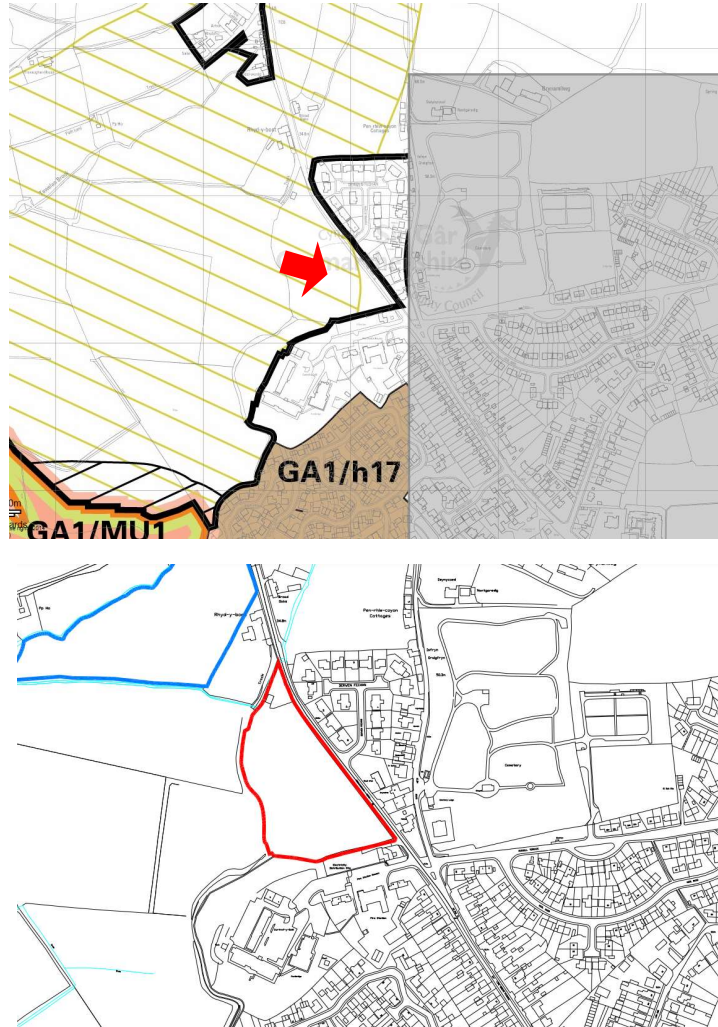


Sustainability Appraisal

Document No SA001

Candidate Site SR/021/021 - Land off Trevaughan Road

Representation No 5202 – Objection to the non-inclusion of site SR/021/021



Address of Candidate Site - Land off Trevaughan Road, Carmarthen, Carmarthenshire.

National Grid Reference - Eastings 240160, Northing 220906

Site Area - approximately 4.09 Acres / 1.65 Hectares

Existing Use - Agricultural

Proposed Use – Residential

Current LDP 2018 -2033 Status of the Site

SR/021/021 (Land off Trevaughan Road) passed all the of the Candidates Sites Assessment Stages (Stages 1, 2a, 2b and 3), however it was not put forward due to the reason “there is sufficient and more suitable land available”. Carmarthenshire County Council have carried out an appraisal of the site, the findings can be seen within the ‘Site Allocation Assessment – Reasonable Alternatives’ Report contained in the 2nd Deposit LDP submission. Representation (No 5202) has been submitted, objecting to the non-inclusion of the site.

Executive Summary

SR/021/021 (Land off Trevaughan Road) passed all the of the Candidates Sites Assessment Stages (Stages 1, 2a, 2b and 3), however it was not put forward due to the reason “there is sufficient and more suitable land available”. Carmarthenshire County Council (CCC) have carried out an appraisal of the site, the findings can be seen within the ‘Site Allocation Assessment – Reasonable Alternatives’ Report contained in the 2nd Deposit LDP submission. Representation (No 5202) has been submitted, objecting to the non-inclusion of the site.

As stated in the ‘CCC Integrated Sustainability Appraisal (ISA) – Guide for Promoters of Sites for Development’, sites that have been submitted previously at the Candidate Site Stage and progressed past stage 2b of the site assessment stage (which this site SR/021/021 has) will not require an Sustainability Appraisal to be carried out. However we have been asked by CCC Forward Planning Section to provide a Sustainability Appraisal (SA) in order to aid with the Planning Inspector decision. We are more than happy to provide this document in order to assist in the process. In order not to duplicate paperwork, we have kept this Sustainability Appraisal (SA) as brief as possible, and only significantly commented / expanded on points where CCC have marked the site down, within the ‘Site Allocation Assessment – Reasonable Alternatives’ Report. Hence this Sustainability Appraisal (SA) should be read in conjunction with the Candidate Site Submission, as that document is more detailed and comprehensive.

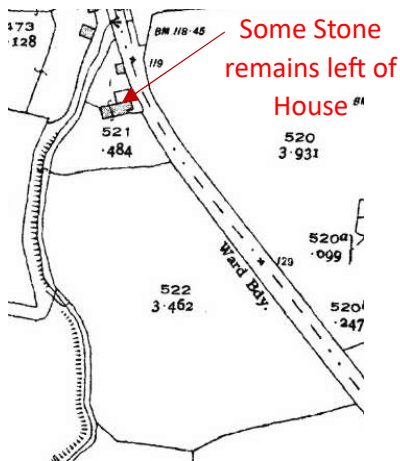
Carmarthenshire County Council (CCC) have already carried out their own assessment (‘Site Allocation Assessment – Reasonable Alternatives’ Report, within the 2nd Deposit LDP Submission) with the same proforma questions that is required within this Sustainability Appraisal. It has already been proven by CCC Forward Planning Section that a development could be delivered on the site and applies with its objectives as it states within that Assessment Report ‘the site was submitted as a candidate site and evidence was provided showing the viability of the site. The report goes on to say ‘the site would provide a logical development opportunity in Carmarthen’

The ‘Site Allocation Assessment – Reasonable Alternatives’ Report by Carmarthenshire County Council contained in the 2nd Deposit LDP submission marked my site down on 3 aspects, namely:- (Q9) no re-use of previously developed land/buildings, (Q18) within a mineral Safeguarding Area and (Q21) on quality agricultural land.

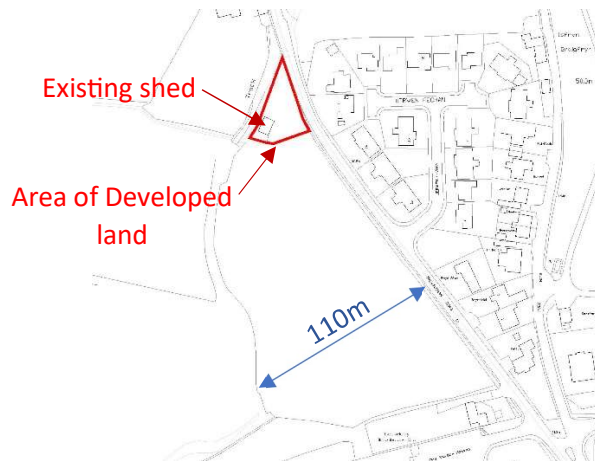
However we would argue the following in relation to those points in that assessment namely:-

(Q9) No reuse of previously land/building

Part of the application site (towards the north) sits of the land that has previously been developed. Not only does the site house an existing shed, but also there are remains of stone walls where once stood a house as evidence of its existence. The presence of a building can also be confirmed on historical maps which a copy is shown in the Candidate Site Submission. The possible re-use/ conversion of the shed / buildings was suggested as part of the Candidate Site Submission. The existing shed was built in the early 1990's and is constructed out of metal corrugated sheeting which is supported by a steel portal frame. This building has now deteriorated and could be considered an eyesore from an aesthetics perspective. This existing shed could be converted, providing a high quality contemporary architectural approach, using a palette of quality natural materials. The existing shed could be converted into a Community Hall which would enhance the local community or into a small enterprise which would contribute to the authority's employment objectives.



Historical map 1935 – 1936



Location Plan 2023

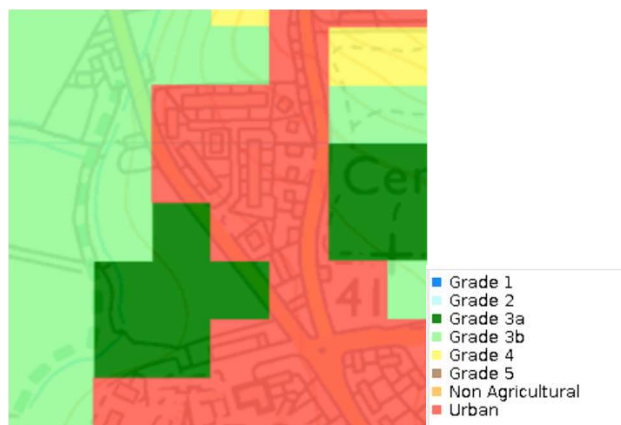
(Q18) Within a mineral Safeguarding area

The 'Site Allocation Assessment – Reasonable Alternatives' Report by Carmarthenshire County Council comments that 'Sand and gravel deposits underlie the site, however the resource at this location is considered to be already largely sterilised as it is within 200m of sensitive development'. The report also states 'the site would provide a logical development opportunity in Carmarthen'.

As stated in my Candidate Site Submission if reserves were proved to be viable any future extraction would need to be at least 250 metres from existing housing. As such the triangular nature of the site, bounded by existing housing (Derwen Fechan Housing Development) on one side and with emergency services, fire station etc on the other, this would completely sterile any works for the whole of the site. As can be seen in location plan 2023 above (Q9), the largest width of the site is approximately 110m, so therefore rendering this site in terms of mineral extraction completely. Therefore, the current designation within the LDP should not present a major constraint given that the site represents a logical extension to the settlement pattern. There is an argument that the mineral safeguarding line shown on the LDP map should already take into account distances from sensitive development, and if this was the case, my site would be completely out of the mineral safeguarding area.

(Q21) Site contain high quality agricultural ground

Unlike large high density urban areas, Carmarthenshire is extremely fortunate to have an abundance of agricultural land. Even though approximately 60% (refer to map below - this percentage could be argued that it is lower) of the land has been classified as 3a grade, it is not of the highest quality grade such as grade 1 or 2.



Predictive Agricultural Land Classification (ALC) Map 2 – From Datamapwales

The diagram above shows the 'Predictive Agricultural land Classification map' from Datamapwales. As can be seen the class 3a quality land (dark green) is situated to the south side of the site, and is like a small dot, surrounded by type 3b and urban classifications land. The proposed field is divided by the 2 categories of agricultural land 3a & 3b. It would be impractical to divide this small field and yield different crops in one area and use the other half for example for grazing land. This basically restricts that land can never be farmed to yield 3a quality produce. The land has never been used for any special yield that is within the 3a category such as cereals, oilseed rape, potatoes, sugar beet etc, it has merely always been used for grazing. It is envisaged that numerous sites (including Carmarthen West) have been put forward through to the deposit LDP which would either have had a 3a agricultural land grade and/or a parcel which would have high ecological value.

As part of the Candidate Site Submission we submitted a Preliminary Ecology Report carried out by Bay Ecology in May 2018. The findings were as follows :

- The site was comprised of a limited range of habitat types predominantly comprised of an improved grassland pastoral field bordered by species poor hedgerows and a short treeline.
- 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 the development.

As part of the representation appeal (5202) of the 2nd deposit LDP we commented that it felt that it relied heavily on the larger sites to meet a significant proportion of its housing supply requirement during the LDP period. There is a strong case that more smaller sites should be allocated to minimise the risk for the Local Authority, thus ensuring that supply is maintained throughout the plan period, in-case these larger sites, in particular the Carmarthen West and Pibwrlwyd projects do not deliver, due to the scale and complex nature that these large developments entail. It was put forward that there was an overriding need for development of more smaller sites and with the site being of low ecological value, this would outweigh the agricultural consideration. It is considered that the site is deliverable for residential development and should not present a major constraint, given that the site represents a logical extension to the settlement pattern.

In conclusion, this Sustainability Assessment & Candidate Site Submission has assessed the site against established site selection criteria set out in Planning Policy Wales. It is clear that proposals for housing development on this site are compatible with the relevant criteria and demonstrates that the site is viable and is deliverable. The candidate site is solely owned (freehold) by the applicant Mr Aled Jones, with there being no impediment to bring forward this parcel of land for residential development. The candidate site is right on the outskirts of the current development plan, and the site represents a logical extension to the settlement pattern, in a sustainable location, adjacent to a key settlement in a marketable location. With the recent the Charles Church development north of College Road, and the development of Derwen Fechan directly opposite, the candidate site represents a logical extension to the settlement pattern. The recent housing development of Derwen Fechan directly opposite and the presence of the existing Fire station to the south, would establish that the site is not isolated and is within the built form. The site also has good containment with established boundaries with its hedgerow and tree line surrounding the site. The scale and density of the proposed development shown within the drawings that accompany the Candidate Site Submission document, reflects that of existing residential development in the area and is considered to be appropriate, while addressing the opportunities and constraints of the site. The site offers an opportunity to develop a high quality sustainable neighbourhood, provide a positive impact upon the Welsh language and thus providing a positive new settlement edge to Carmarthen Town. It is considered that the site can provide a range of both open market and affordable homes along with high quality open space supporting the wider Green Infrastructure strategy of Carmarthenshire County Council, creating a highly desirable and attractive place to live.

Contents

Executive Summary	2
Contents Page	5
Sustainability Appraisal (As per require proforma)	6
Conclusion	19
Appendix	21
A - Drawings	
• Existing Location Plan	Drg no - 1000/001
• Existing Site Plan	Drg no - 1000/002
• Proposed indicative Site layout 'A'	Drg no - 1000/003
• Proposed indicative Site layout 'B'	Drg no - 1000/004
• Indicative Highways / Junction Layout	
• Indicative Drainage Strategy Drawing	
B - Pre planning letter from Welsh Water (19th April 2018)	
C - Utility Information from Service Providers	
• BT	
• Gas	
• Western Power	
• Welsh Water	
• Street Lighting	
D - Preliminary Ecology Report (May 2018)	
E - Flood map (NRW)	
F - Miscellaneous Information	
• Public Footpath Map	
• Bus Stop	
• Historical Map 1935 - 1936	
• Active Travel - Integrated Network Map	

Please note - In order not to duplicate paperwork, we have kept this Sustainability Appraisal (SA) as brief as possible. Therefore we have not included the 'greyed out' appendix information within this Sustainability Appraisal. Please refer to Candidate Site Submission Document for this information.

Please also refer to The 'Site Allocation Assessment – Reasonable Alternatives' Report by Carmarthenshire County Council contained in the 2nd Deposit LDP submission

Sustainability Appraisal

Q1 Is the site compatible against the location of the future growth presented in the Deposit LDP (ACI1, ISA1)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site complies with objective. Within CCC Reasonable Alternatives assessment Report, it is quoted 'the site would provide a logical development opportunity in Carmarthen'

Our Comment

Yes - The candidate site is right on the outskirts of the current development plan, and the site represents a logical extension to the settlement pattern, in a sustainable location, adjacent to a key settlement in a marketable location. With the recent the Charles Church development north of College Road, and the development of Derwen Fechan directly opposite, the candidate site represents a logical extension to the settlement pattern. The recent housing development of Derwen Fechan directly opposite and the presence of the existing Fire station to the south, would establish that the site is not isolated and is within the built form. The site also has good containment with established boundaries with its hedgerow and tree line surrounding the site. The scale and density of the proposed development shown within the drawings that accompany this Candidate Site Submission document, reflects that of existing residential development in the area and is considered to be appropriate, while addressing the opportunities and constraints of the site. Therefore, on this basis it is considered that the site is deliverable for residential development.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission LDP map

Q2 Can the site accommodate 5 or more dwellings?

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site complies with objective.

Our Comment

Yes - As can be seen from the indicative proposals contained within the Candidate Site Submission it is considered that the site could accommodate between 26 - 40 dwellings approximately, so in keeping with the density of the housing in the locality. These drawings also provide possible options of what can be achieved on the site and shows that the allocation for 'Affordable Housing' and 'Open Spaces' can be accommodated 'on site', should this be agreed that this is the most appropriate option.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Q3 Is the site within, or directly related to an identified settlement in Tiers 1-3 of the LDP preferred Strategy

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site complies with objective. Within CCC Reasonable Alternatives assessment Report, it is quoted 'the site would provide a logical development opportunity in Carmarthen'.

Our Comment

Yes, Tier 1 Carmarthen Town. The candidate site is right on the outskirts of the current development plan, and the site represents a logical extension to the settlement pattern, in a sustainable location, adjacent to a key settlement in a marketable location.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Q4 Is the site located within a flood risk zone? (AC14, AC15, ISA4, ISA5)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No - In accordance with Natural Resources Wales and Welsh Government TAN 15 Development Advice Maps contained within appendix E of the Candidate Site Submission, it can be seen that the intended developed area of the site is located within an area designated being Zone A. In accordance with guidance contained within TAN 15, further flood risks and justification tests are not required to sites located within Zone A and sound drainage design incorporating aspects of Sustainable Urban Drainage Systems (SuDS) is applicable to the development. Therefore, on this basis it is considered that the site is deliverable for residential development

Data Source

Appendix E – Flood maps within Candidate Site Submission

Q5 Is the site located within or immediately adjacent to any sites designated for importance to nature conservation? (AC12, ISA2)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No the site does not, as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Data Source

Refer to LDP Constraints Map

Q6 Is the site located within or immediately adjacent to any scheduled monuments ? (AC18, ISA8)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No the site does not, as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Data Source

Refer to LDP Constraints Map

Q7 Would development of the site be in contrary to general planning principles?

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No, this would not form any unacceptable development and would not result in any loss of public open space or formal recreational land. The candidate site is right on the outskirts of the current development plan, and the site represents a logical extension to the settlement pattern, in a sustainable location, adjacent to a key settlement in a marketable location. With the recent the Charles Church development north of College Road, and the development of Derwen Fechan directly opposite, the candidate site represents a logical extension to the settlement pattern. The recent housing development of Derwen Fechan directly opposite and the presence of the existing Fire station to the south, would establish that the site is not isolated and is within the built form. The site also has good containment with established boundaries with its hedgerow and tree line surrounding the site. The scale and density of the proposed development shown within the drawings that accompany this Candidate Site Submission document, reflects that of existing residential development in the area and is considered to be appropriate, while addressing the opportunities and constraints of the site. Therefore, on this basis it is considered that the site is deliverable for residential development.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Q8 Would the development of the site have a detrimental impact on the character and setting of the settlement or its features? (ACI8, ACI9, ISA8, ISA9)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No, the development will not affect the landscape, townscape and any buildings of importance. The candidate site is right on the outskirts of the current development plan, and the site represents a logical extension to the settlement pattern, in a sustainable location, adjacent to a key settlement in a marketable location. With the recent the Charles Church development north of College Road, and the development of Derwen Fechan directly opposite, the candidate site represents a logical extension to the settlement pattern. The recent housing development of Derwen Fechan directly opposite and the presence of the existing Fire station to the south, would establish that the site is not isolated and is within the built form. The site also has good containment with established boundaries with its hedgerow and tree line surrounding the site. The scale and density of the proposed development shown within the drawings that accompany this Candidate Site Submission document, reflects that of existing residential development in the area and is considered to be appropriate, while addressing the opportunities and constraints of the site. Therefore, on this basis it is considered that the site is deliverable for residential development.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Q9 Will the proposal involve the re-use of suitable previously developed land and/or buildings? (ISA9, ISA7)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site is in conflict with objective.

Our Comment

Yes, part of the site has been previously developed and there is an opportunity to re-use an existing building. We would dispute the assessment by Carmarthenshire County Council made in the Site Allocation Assessment – Reasonable Alternatives Report. Part of the application site (towards the north) sits on the land that has previously been developed. Not only does the site house an existing shed, but also there are remains of stone walls where once stood a house as evidence of its existence. The presence of a building can also be confirmed on historical maps which a copy is shown in the Candidate Site Submission (appendix F). The possible re-use/ conversion of the shed / buildings was suggested as part of the Candidate Site Submission. The existing shed was built in the early 1990's and is constructed out of metal corrugated sheeting which is supported by a steel portal frame. This building has now deteriorated and could be considered an eyesore from an aesthetics perspective. This existing shed could be converted, providing a high quality contemporary architectural approach, using a palette of quality natural materials. The existing shed could be converted into a Community Hall which would enhance the local community or into a small enterprise which would contribute to the authority's employment objectives.

Data Source

Refer to diagrams within the Executive Summary this SA
Appendix F – Historic Map in the Candidate Site Submission

Q10 Is the site accessible from the existing public highway?

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site complies with objective.

Our Comment

Yes - From a highway and access perspective the land is situated directly off Trevaughan Road so there is no third party approval required to provide access into the site.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Q11 Does the site have an available access point with adequate visibility?

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site complies with objective.

Our Comment

Yes - It has been demonstrated in the Indicative Site Layout Plans (Drg 003, 004 & 005) contained within the Candidate Site Submission that a new road access can be provided into the site allowing for good visibility at the junction.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Q12 Have any significant and evidenced highway issues been identified relating to the site?

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No – In terms of highways and accessibility it is considered that the site is deliverable for residential development. Trevaughan Road runs directly parallel along the applications site eastern boundary. There is a speed limit of 30mph which runs along Trevaughan Road. There is existing traffic calming provided in the village of Trevaughan to the north some 150m away from the candidate site. To the south along Lime Grove Avenue there is existing traffic calming some 500m away from the candidate site.

Vehicular access to the site is to be provided with a new junction along the site's eastern boundary off Trevaughan Road. Refer to drawing No 1000/05 in the Candidate Site Submission which shows an indicative highways / junction layout. Internally, the new access road will serve the dwellings located within the site. The new road will comprise a 5.5m wide carriageway along its entire length with 1.8m footways on both sides. The footways will be lit and will provide safe passage for pedestrians onto Trevaughan Road and thereafter towards the wider areas of the community.

It is proposed that the internal layout of the development site and the junction will be designed to current standards. The design of the internal road layout will ensure safe and convenient movement across the site and that is accessible to all members of the community.

It can be seen from the Drg No 1000/005 - Indicative Highways / Junction Layout, that the required visibility splays are accommodated within land owned by the applicant/highway authority. Car parking provision is proposed to be made in accordance with the Carmarthenshire Parking Standards.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Q13 Does the site have suitable access to public transport and/or active travel route? (ACI3, ACI4, ACI6, ACI12, ACI13, ACI15, ISA4, ISA6, ISA12, ISA13, ISA15)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site complies with objective.

Our Comment

Yes - There are good established links via nearby bus stops, public footpaths and pavement provision to the Carmarthen Town and the wider areas of the community.

Links - Trevaughan Road runs directly parallel along the applications site eastern boundary. This will provide good transport links to the Town, the A40 and beyond.

Public Transport - The nearest bus stop is on the main road along Trevaughan Road directly opposite the candidate site. There is also a bus stop in Trevaughan, some 200m from candidate site which is served by the no. 206 / 225 to Tanerdy and Town respectively. Refer to appendix F for map showing location of Bus stops

Walking - Pavement provision along Trevaughan Road is provided on the side of the candidate site all the way to Trevaughan in a northerly direction, and to Lime Gove Avenue / Carmarthen Town in a southerly direction. There is some pavement provision on the opposite side of Trevaughan Road, where the entrance of Derwen Fechan is situated.

Active Travel (Wales) Act 2013 - Refer to appendix F within the Candidate Site Submission which contains the Integrated Network Map (INM) which sets out Carmarthenshire Council's 15-year vision to improve cycling and walking routes across the county. As can be seen on the Integrated Network Map there is a proposal to improve the networking walking route right up Lime Grove, which is in close proximity to the candidate site.

Public rights of way - There are no public rights of way within the site boundary. However there is a public rights of way directly beyond the sites western boundary. There may be potential to enhance this Green Infrastructure link by providing a direct route from the site onto the public footpath possibly via an 'open space' garden facility. Refer to appendix F for map showing location of Public Footpath.

Cycling provision - It's clear from the layout plan Drg No 1000/003 & 1000/004 that each proposed dwelling is provided with ample private amenity space which can accommodate either garages or garden sheds which will provide space for secure storage of bicycles, thus promoting a sustainable means of transport for the prospective residents. As can be seen in appendix F which contains the Integrated Network Map (INM) there is a proposal to provide walking networking route right up Lime

Grove which is in close proximity to the candidate site, this will improve the links for active travel and provide links to the cycle network within the community. It is the authorities long term ambition to become the cycling hub of Wales.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Appendix F - Integrated Network Map (INM) & location of bus stops in the Candidate Site Submission

Q14 Does the site have access to green space, leisure and recreational facilities that are within a reasonable distance? (ACI12, ACI15, ISA12, ISA15)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site complies with objective.

Our Comment

Yes - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council. The candidate site is right on the outskirts of the current development plan, adjacent to a key settlement with numerous green spaces, leisure and recreational facilities available all within a short distance. Drawing no 1000/003 and 1000/004 provide possible options of what can be achieved on the site and shows that the allocation for open space can be accommodated 'on site', should this be agreed that this is the most appropriate option. Should the site be identified for inclusion within the revised LDP, the scheme will be taken forward in consultation with the Local Planning Department and /or registered social landlord (RSL)

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Refer to LDP map

Q15 Is the site within reasonable distance of employment provision, retail provision and other services and facilities? (ACI6, ACI10, ACI14, ACI15, ISA6, ISA10, ISA14, ISA15)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site complies with objective.

Our Comment

Yes - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council. The candidate site is right on the outskirts of the current development plan, adjacent to a key settlement with numerous employment, retail provision and other services and facilities, all within a reasonable distance. As described in Q13 there are good established links via nearby bus stops, public footpaths, active travel and pavement provision to Carmarthen Town and the wider areas of the community.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Refer to LDP map

Q16 Is the site within a reasonable distance to education facilities? (ACI13, ISA13)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site complies with objective.

Our Comment

Yes - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council. The candidate site is right on the outskirts of the current development plan, adjacent to a key settlement with numerous educational facilities, all within a reasonable distance. As described in Q13 there are good established links via nearby bus stops, public footpaths, active travel and pavement provision to Carmarthen Town and the wider areas of the community.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission
Refer to LDP map

Q17 Is the site located within or adjacent to a mineral buffer zone? (ACI6, ISA6)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council.

Data Source

Refer to LDP Map

Q18 Is the site located within a Mineral Safeguarding Area. (ACI6, ISA6)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site is in conflict with objective. The report comments that ‘Sand and gravel deposits underlie the site, however the resource at this location is considered to be already largely sterilised as it is within 200m of sensitive development’. The report also states ‘the site would provide a logical development opportunity in Carmarthen’.

Our Comment

Yes - However if reserves were proved to be viable any future extraction would need to be at least 250 metres from existing housing. As such the triangular nature of the site, bounded by existing housing (Derwen Fechan Housing Development) on one side and with emergency services, fire station etc on the other, this would completely sterile any works for the whole of the site. As can be seen in location plan 2023 (within the Executive Summary of this SA), the largest width of the site is approximately 110m, so therefore rendering this site in terms of mineral extraction completely. Therefore, the current designation within the LDP should not present a major constraint given that the site represents a logical extension to the settlement pattern. There is an argument that the mineral safeguarding line shown on the LDP map should already take into account distances from sensitive

development, and if this was the case, my site would be completely out of the mineral safeguarding area.

Data Source

Refer to location plan 2023 within the Executive Summary of this SA
Refer to LDP Map

Q19 Is the site within or immediately adjacent to an AQMA (ACI3, ISA3)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council.

Data Source

Refer to LDP Map

Q20 Does the site contain high carbon soil eg. peatlands within or immediately adjacent to an AQMA (ACI7, ISA7)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council.

Data Source

Refer to LDP Map

Q21 Does the site contain high quality agricultural land (grade1, 2, 3a)? (ISA7)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site is in conflict with objective. The report indicates that ‘more than 60% of the site is classified as agricultural grade 3a land’. The report also states ‘the site would provide a logical development opportunity in Carmarthen’.

Our Comment

Unlike large high density urban areas, Carmarthenshire is extremely fortunate to have an abundance of agricultural land. Even though approximately 60% (refer to map below - this percentage could be argued that it is lower) of the land has been classified as 3a grade, it is not of the highest quality grade such as grade 1 or 2.

The diagram within the Executive Summary of this SA shows the ‘Predictive Agricultural land Classification map’ from Datamapwales. As can be seen the class 3a quality land (dark green) is situated to the south side of the site, and is like a small dot, surrounded by type 3b and urban

classifications land. As can be seen the proposed field is divided by the 2 categories of agricultural land 3a & 3b. It would be impractical to divide this small field and yield different crops in one area and use the other half for example for grazing land. This basically restricts that the land can never be farmed to yield 3a quality produce. The land has never been used for any special yield that is within the 3a category such as cereals, oilseed rape, potatoes, sugar beet etc, it has merely always been used for grazing. It is envisaged that numerous sites (including Carmarthen West) have been put forward through to the deposit LDP which would either have had a 3a agricultural land grade and/or a parcel which would have high ecological value.

As part of the Candidate Site Submission we submitted a Preliminary Ecology Report carried out by Bay Ecology in May 2018. The findings were as follows :

- The site was comprised of a limited range of habitat types predominantly comprised of an improved grassland pastoral field bordered by species poor hedgerows and a short treeline.
- 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 the development.

As part of the representation appeal (5202) of the 2nd deposit LDP we commented that we felt that it relied heavily on the larger sites to meet a significant proportion of its housing supply requirement during the LDP period. There is a strong case that more smaller sites should be allocated to minimise the risk for the Local Authority, thus ensuring that supply is maintained throughout the plan period, in-case these larger sites, in particular the Carmarthen West and Pibwrlwyd projects do not deliver, due to the scale and complex nature that these large developments entail. It was put forward that there was an overriding need for development of more smaller sites and with the site being of low ecological value, this would outweigh the agricultural consideration. Happy to meet with the Planning Department to discuss any mitigation measures that may be appropriate.

It is considered that the site is deliverable for residential development and should not present a major constraint, given that the site represents a logical extension to the settlement pattern.

Data Source

Refer to 'Predictive Agricultural land Classification map' from Datamapwales within the Executive Summary of this SA

Q22 Is the site located within or immediately adjacent to any RIG's? (AC19, ISA9)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council.

Data Source

Refer to LDP Map

Q23 Are there any significant concerns set out in the SFCA – Stage 1 which could impact on the delivery of the site? (ACI4, ACI5, ISA4, ISA5)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council.

Data Source

As per CCC appraisal

Q24 Does the site have an available water connection?

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site complies with objective.

Our Comment

Yes – Existing Utilities are present along Trevaughan Road which runs parallel to the site to the sites western boundary, therefore there are no third party approval required (over any other land) to bring these infrastructure to access into the site. These include - BT, electric, mains gas, water, & street lighting. Infrastructure plans of these utilities can be seen in appendix C of the Candidate Site Submission

DCWW have confirmed, by means of written pre-planning enquiry response referenced PPA0002936, dated 19th April 2018 that a water supply can be made available to service this proposed development.

From a utility perspective it is considered that there is nothing that would prejudice any residential development on the site.

Data Source

Appendix B - DCWW pre-planning enquiry PPA0002936, within the Candidate Site Submission
Appendix C - Utility Information within the Candidate Site Submission

Q25 Is the site within or adjacent to a phosphate sensitive SAC catchment? (ACI2, ACI5, ACI7, ISA2, ISA5, ISA7)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council.

Data Source

Refer to LDP Map

Q24 Does the site have connections to other infrastructure requirements?

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes - Proposed site complies with objective.

Our Comment

Yes – Existing Utilities are present along Trevaughan Road which runs parallel to the site to the sites western boundary, therefore there are no third party approval required (over any other land) to bring these infrastructure to access into the site. These include - BT, electric, mains gas, water, & street lighting. Infrastructure plans of these utilities can be seen in appendix C of the Candidate Site Submission.

In terms of surface water disposal, SUDs and infiltration will be considered, though these option will depending on ground investigations and percolation testing. However Priority Level 3 (discharge to a surface water body) via attenuation at the very least is deliverable. With there being a stream adjoining the north of the site, there is no third party approval for access to the watercourse. Topography is also favourable to allow for natural gravity feed.

Dwr Cymru Welsh Water (DCWW) sewer record plan indicates the presence of an existing 150 mm diameter combined sewer network running through the site. This pipe then leads goes through the fields beyond the site to a treatment plant. All foul water only drainage flows will be collected from the new Housing Development via a new gravity sealed pipe system and connected into the existing public combined water sewer network which crosses the candidate site. Topography is also favourable to allow for natural gravity discharge. DCWW have confirmed, by means of written pre-planning enquiry response referenced PPA0002936, dated 19th April 2018, that there is sufficient capacity within the Public Sewage Network and Treatment Works to accept the foul water only flows from the proposed development. The DCWW pre-planning enquiry response and record plans are included in Appendix B.

As can be seen in Drg No 1000/006 the existing drainage apparatus can be accommodated within the proposed site layout without the need to / or minimise the need to realign the pipes. From a utility perspective it is considered that there is nothing that would prejudice any residential development on the site.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Appendix B - DCWW pre-planning enquiry PPA0002936, within the Candidate Site Submission

Appendix C - Utility Information within the Candidate Site Submission

Q27 Does the location and/or scale of the site have the potential to have a detrimental impact on Welsh Language? (ACI11, ISA11)

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

No - Proposed site complies with objective.

Our Comment

No - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council.

The site offers an opportunity to develop a high quality sustainable neighbourhood, provide a positive impact upon the Welsh language and thus providing a positive new settlement edge to Carmarthen Town. It is considered that the site can provide a range of both open market and affordable homes along with high quality open space supporting the wider Green Infrastructure strategy of Carmarthenshire County Council, creating a highly desirable and attractive place to live.

The scale and density of the proposed development shown within the drawings that accompany the Candidate Site Submission document, reflects that of existing residential development in the area and is considered to be appropriate, while addressing the opportunities and constraints of the site.

Data Source

Appendix A – Drawings in this Sustainability Appraisal and the Candidate Site Submission

Q28 Has the applicant provided sufficient evidence to show the development is deliverable and financially viable?

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes – the report comments ‘the site was submitted as a candidate site and evidence was provided showing the viability of the site. The report goes on to say ‘the site would provide a logical development opportunity in Carmarthen’

Our Comment

Yes - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council. The candidate site is solely owned (freehold) by the applicant Mr Aled Jones, with there being no impediment to bring forward this parcel of land for residential development. As can be seen within the candidate Site Submission there are no third party approval required over any other land for access to the watercourse, main road and any existing utility infrastructure. The site was previously in no beneficial use. It is considered that the site is deliverable and financially viable for residential development and within the timescale of the LDP 2018 - 2033

Data Source

Refer to Candidate Site Submission

Q29 Has the applicant provided sufficient evidence to identify when the site will be brought forward for development?

Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council

Yes

Our Comment

Yes - as per the findings within the Site Allocation Assessment – Reasonable Alternatives Report by Carmarthenshire County Council. As sites go, this is one of the easier sites to develop ie ownership, topography, availability of services, no third party approval etc. It is considered that the site is deliverable for residential development and within the timescale of the LDP 2018 - 2033

Conclusion

In conclusion, this submission has assessed the site against established site selection criteria set out in Planning Policy Wales. It is clear that proposals for housing development on this site are compatible with the relevant criteria. It is acknowledged that proposals will need to be refined on the basis of study information, and it will be necessary to ensure the amenity of existing and future residents are protected with careful consideration for design and layout of the site.

The Candidate Site Submission document together with the set of drawings which accompanies this application demonstrates that the site is viable and is deliverable to be developed for residential development.

The candidate site is solely owned (freehold) by the applicant Mr Aled Jones, with there being no impediment to bring forward this parcel of land for residential development.

The candidate site is right on the outskirts of the current development plan, and the site represents a logical extension to the settlement pattern, in a sustainable location, adjacent to a key settlement in a marketable location. With the recent the Charles Church development north of College Road, and the development of Derwen Fechan directly opposite, the candidate site represents a logical extension to the settlement pattern. The recent housing development of Derwen Fechan directly opposite and the presence of the existing Fire station to the south, would establish that the site is not isolated and is within the built form. The site also has good containment with established boundaries with its hedgerow and tree line surrounding the site. The scale and density of the proposed development shown within the drawings that accompany this Candidate Site Submission document, reflects that of existing residential development in the area and is considered to be appropriate, while addressing the opportunities and constraints of the site.

From a highway and access perspective the land is situated directly off Trevaughan Road so there is no third party approval required to provide access into the site. It has been demonstrated that a new road access can be provided into the site allowing for good visibility at the junction. There are good established links via nearby bus stops, public footpaths and pavement provision to the Carmarthen Town and the wider areas of the community. In terms of highways and accessibility it is considered that the site is deliverable for residential development

In terms of surface water disposal, SUDs and infiltration will be considered, though these option will depending on ground investigations and percolation testing. However Priority Level 3 (discharge to a surface water body) via attenuation at the very least is deliverable. With there being a stream adjoining the north of the site, there is no third party approval for access to the watercourse. Topography is also favourable to allow for natural gravity feed.

In terms of foul water discharge, Dwr Cymru Welsh Water (DCWW) sewer record plan show apparatus within Trevaughan Road and also indicates the presence of an existing 150 mm diameter combined sewer network running through the site. All foul drainage flows can be collected and connected into the existing public combined water sewer network which crosses the candidate site. Topography is also favourable to allow for natural gravity discharge. DCWW have confirmed, by means of written pre-planning enquiry response referenced PPA0002936, dated 19th April 2018, that there is sufficient capacity within the Public Sewage Network and Treatment Works to accept the foul water only flows from the proposed development. As can be seen in Drg No 1000/006 the existing drainage apparatus can be accommodated within the proposed site layout without the need to / or minimise the need to realign the pipes. As has been demonstrated, the discharge of foul water from a residential development on this candidate site is deliverable.

Existing utilities are present along Trevaughan Road which runs parallel to the sites eastern boundary, again with no third party approval required (over any other land) to bring these infrastructure to access into the site. These include - BT, electric, mains gas, water, & street lighting. Enquiries will need to be made to the provider in respect of permission and possible increased supply demand, however it is considered from a utility perspective that the site is deliverable for residential development.

In terms of flooding, in accordance with Natural Resources Wales and Welsh Government TAN 15 Development Advices Maps, it can be seen that the intended 'developed area' of the site is located within an area designated being Zone A. Therefore on this basis it is considered that the site is deliverable for residential development.

The site is classified as a greenfield site and has not been previously developed. Therefore from a geotechnical and archaeological perspective there are no known constraints so therefore the site can be considered deliverable for residential development

As can be seen from the Preliminary Ecology Report (May 2018) carried out by Bay Ecology the site is of low ecological value. The site was comprised of a limited range of habitat types predominantly comprised of an improved grassland pastoral field bordered by species poor hedgerows and a short treeline. In terms of the ecological importance of the site the large improved grassland pastoral field was of low intrinsic ecological value. The report recommended that any future development retain as much of the boundary hedgerows, where practicable. It is envisaged that the boundaries hedgerow to the site will remain in place, except for a small section of fragmentation of the hedgerow to the sites eastern boundary to accommodate the introduction of the new access road into the site. Any mitigation measures following any further hedgerow surveys will provide an opportunity to enhance the sites ecological value. With the site being of low ecological value, it is considered that the site is deliverable for residential development

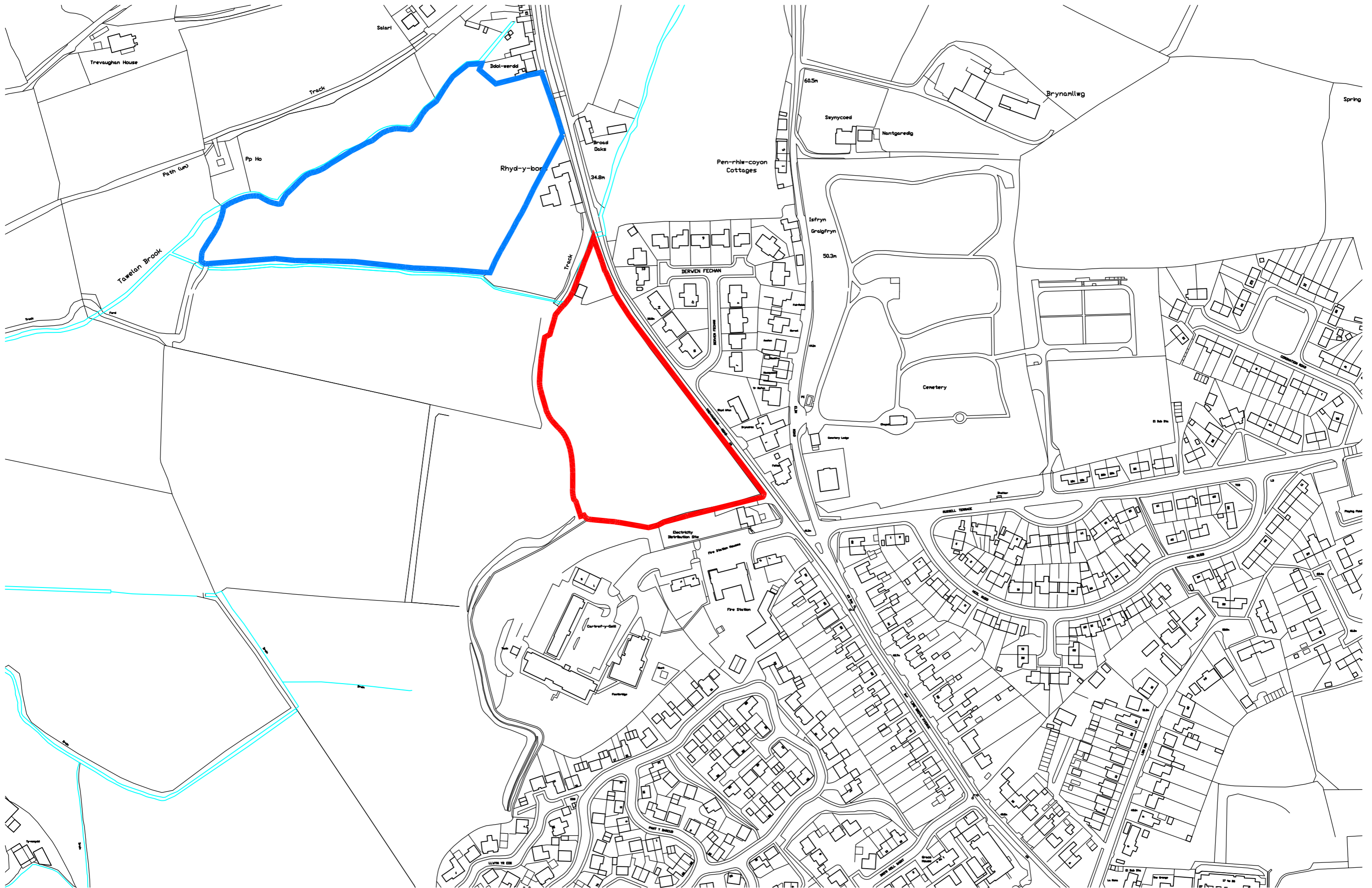
As can be seen from the Candidate Site Submission document it has been demonstrated that the site can be delivered for residential development. The site offers an opportunity to develop a high quality sustainable neighbourhood, provide a positive impact upon the Welsh language or any local communities and thus providing a positive new settlement edge to Carmarthen Town. It is considered that the site can provide a range of both open market and affordable homes along with high quality open space supporting the wider Green Infrastructure strategy of Carmarthenshire County Council, creating a highly desirable and attractive place to live.

As part of the representation appeal (5202) of the 2nd deposit LDP we commented that it felt that it relied heavily on the larger sites to meet a significant proportion of its housing supply requirement during the LDP period. There is a strong case that more smaller sites should be allocated to minimise the risk for the Local Authority, thus ensuring that supply is maintained throughout the plan period, in-case these larger sites, in particular the Carmarthen West and Pibwrlwyd projects do not deliver, due to the scale and complex nature that these large developments entail. It was put forward that there was an overriding need for development of more smaller sites and with the site being of low ecological value, this would outweigh the agricultural consideration.

In light of the above and to serve future local needs, the land owner and applicant Mr Aled Jones, kindly requests that the land off Trevaughan Road, Carmarthen be designated for Housing Land Allocation, through the Carmarthenshire County Council Local Development Plan Review process (2018 - 2033).

Appendix

Please refer to Candidate Site Submission Document for Full Appendix information



Existing Location Plan

Scale 1 : 2500

Crown copyright, All rights reserved. 2018 Licence number 0100042766

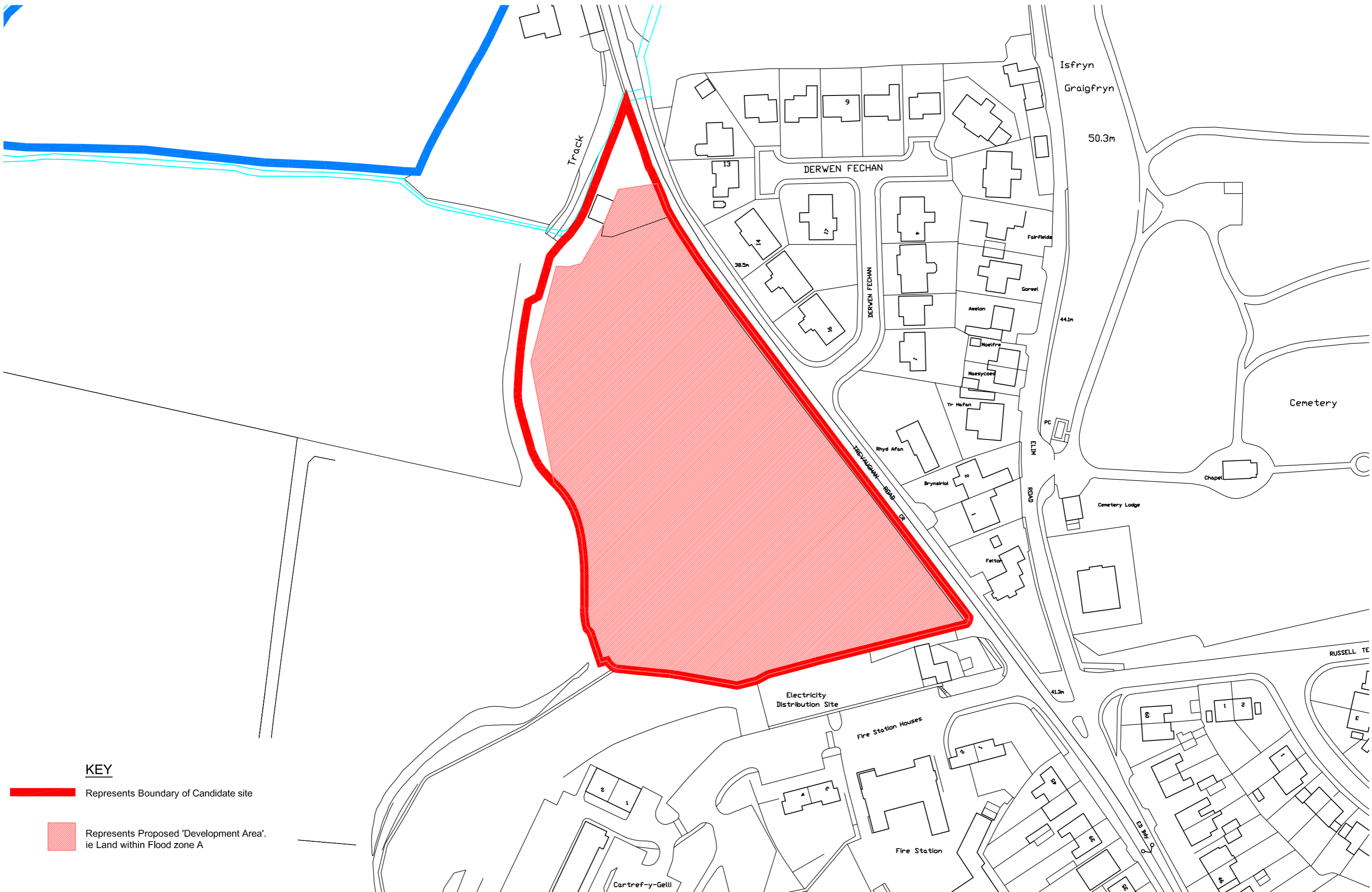


Job Title:
 Submission of Candidate Site
 for LPD 2018 - 2033
 Land off Trevaughan Road,
 Carmarthen, Carmarthenshire



Drawing Title:
 Existing Location Plan
 Date:
 August 2018

Scales: (at A3)
 1 : 2500
 Drawing Number:
 1000/001
 Revision
 -

No: Amendment Details: Date:



KEY

-  Represents Boundary of Candidate site
-  Represents Proposed 'Development Area'. ie Land within Flood zone A

Existing Site Plan

Scale 1 : 1250
 Crown copyright, All rights reserved. 2018 Licence number 0100042766





Job Title: Submission of Candidate Site for LPD 2018 - 2033 Land off Trevaughan Road, Carmarthen, Carmarthenshire	Drawing Title: Existing Site Plan Date: August 2018	Scales: (at A3) 1 : 1250 Drawing Number: 1000/002 Revision -	No: Amendment Details: Date:
--	--	---	------------------------------------

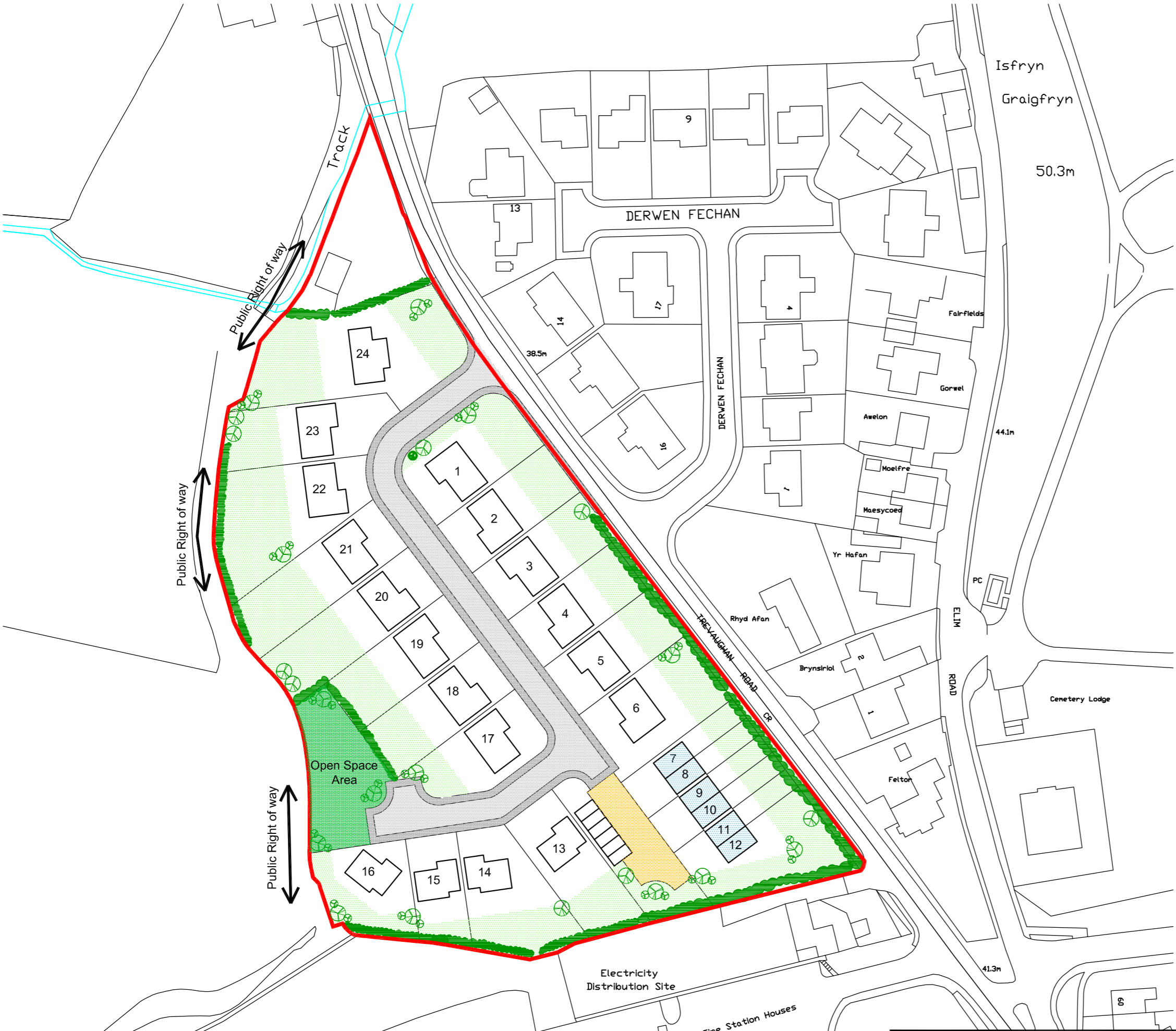
Indicative Site Layout - 'A'

Proposed Scale, size & density of development based on Derwen Fechan Housing development opposite

Drawing no 1000/003 and 1000/004 provide possible options of what can be achieved on the site. Indicative Site layout 'A' represents a development similar in scale and density to the Derwen Fechan site opposite. Indicate Site layout 'B' represents a development similar in scale and density to a National Housing Developer

it is proposed that the scheme will provide a mixture of 2,3 and 4 bedroom development, and as can be seen on indicative housing no 1000/003 and 1000/004 that the allocation for affordable housing and open spaces can be accommodated 'on site'. It is considered that the architectural approach will be a quality design solution, enhancing the local community, in line with the aspirations of local development plan policies

- 
 Indicative only. Represents possible 2,3 or 4 bedroom development, with integral garage.
- 
 Indicative only. Represents Affordable Housing



Indicative Site Layout Plan - Layout 'A'

Scale 1 : 1000

Crown copyright, All rights reserved. 2018 Licence number 0100042766



Job Title:
Submission of Candidate Site
for LPD 2018 - 2033
Land off Trevaughan Road,
Carmarthen, Carmarthenshire

Drawing Title:
Indicative Site Layout Plan
Layout 'A'
Date:
August 2018

Scales: (at A3)
1 : 1000
Drawing Number:
1000/003
Revision
-

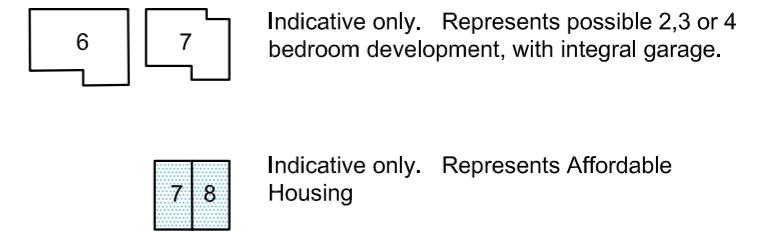
No: Amendment Details: Date:

Indicative Site Layout - 'B'

Proposed Scale, size & density based on a National House Builder Development

Drawing no 1000/003 and 1000/004 provide possible options of what can be achieved on the site. Indicative Site layout 'A' represents a development similar in scale and density to the Derwen Fechan site opposite. Indicate Site layout 'B' represents a development similar in scale and density to a National Housing Developer

It is proposed that the scheme will provide a mixture of 2,3 and 4 bedroom development, and as can be seen on indicative drawing no 1000/003 and 1000/004 that the allocation for affordable housing and open spaces can be accommodated 'on site'. It is considered that the architectural approach will be a quality design solution, enhancing the local community, in line with the aspirations of local development plan policies



Indicative Site Layout Plan - Layout 'B'

Scale 1 : 1000

Crown copyright, All rights reserved. 2018 Licence number 0100042766



Job Title:
Submission of Candidate Site
for LPD 2018 - 2033
Land off Trevaughan Road,
Carmarthen, Carmarthenshire

Drawing Title:
Indicative Site Layout Plan
Layout 'B'
Date:
August 2018

Scales: (at A3)
1 : 1000
Drawing Number:
1000/004
Revision
-

No: Amendment Details: Date: