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Cyngor Sir Gâr
Carmarthenshire
County Council



Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin 2018 - 2033
Carmarthenshire Revised Local Development Plan 2018 - 2033

Ffurflen Sylwadau 2il Cynllun Datblygu Lleol Diwygiedig Adneuo
2nd Deposit Revised LDP Representation Form

Hoffem gael eich barn am yr 2il Cynllun Datblygu Lleol Diwygiedig Adneuo (Cynllun Datblygu Lleol) ac ar ddogfennau sy'n cefnogi'r Cynllun Datblygu Lleol.

Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. sylwadau neu wrthwynebiadau) Mae fersiynau nodiadau cyfarwyddyd ar gael o www.sirgar.llyw.cymru. Os ydych yn cyflwyno copi papur, atodwch dudalennau ychwanegol lle bod angen.

Bydd angen i unrhyw sylwadau a wnaed i'r CDLI Adneuo 1af gael eu hailgyflwyno fel rhan o'r ymgynghoriad ar yr 2il Adnau CDLI. Dim ond sylwadau a wnaed yn briodol i'r 2il CDLI Diwygiedig Adneuo fydd yn cael eu cyflwyno yn yr Arholiad. Ni fydd sylwadau a wnaed i'r CDLI Adneuo 1af bellach yn cael eu hystyried ac ni fydd yn rhan o'r Arholiad.

Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Yr Arolygiaeth Gynllunio.

Mae'n rhaid derbyn eich sylwadau erbyn 4:30pm ar y 14 o Ebrill 2023.

Dychwelwch ffurflenni at:

Rheolwr Blaen-gynllunio, Lle a Chynaliadwyedd, Adran Lle a Seilwaith, 3 Heol Spilman, Caerfyrddin, SA31 1LE

We would like your views on the Revised Carmarthenshire Local Development Plan (LDP) 2nd Deposit, and also on documents which support the LDP.

This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at www.carmarthenshire.gov.wales. If you are submitting a paper copy, attach additional sheets as necessary.

Any representations made to the 1st Deposit LDP will need to be resubmitted as part of the consultation on the 2nd Deposit LDP. Only duly made representations to the 2nd Deposit Revised LDP will be submitted for examination. Representations made to the 1st Deposit LDP will no longer be considered and will **not** form part of the Examination.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received by 4:30pm on the 14th April 2023.

Please return forms to:

Forward Planning Manager, Place and Sustainability, Department of Sustainability and Infrastructure, 3 Spilman Street, Carmarthen, SA31 1LE.

RHAN A: Manylion cysylltu**PART A: Contact details****Eich manylion/manylion eich cleient**
Your details / your client's details**Manylion yr asiant (os ydynt yn berthnasol)****Agent's details (if relevant)****Enw**
Name

Sarah Eyles

Teitl swydd
(lle y bo'n berthnasol)
Job title
(where relevant)**Sefydliad (lle y bo'n berthnasol)**
Organisation
(where relevant)

Isles Computer Services Ltd t/a Sunny Bank Solar

I am submitting this as both a residential owner of my house, and director of a company that own a solar farm on my land.

Cyfeiriad
AddressSunny Bank
Llanfihangel-Ar-Arth
Pencader
Carmarthenshire
SA399HX**Rhif ffôn**
Telephone no

[REDACTED]

E-bost
Email address

[REDACTED]

Llofnodwyd
Signed[REDACTED]
Posted to:
Forward Planning Manager, Place and Sustainability, Department of Sustainability and Infrastructure, 3 Spilman Street, Carmarthen, SA31 1LE.**Dyddiad**

5/3/2023

Date	
RHAN B: Eich sylw	
PART B: Your representation	
<i>Eich enw / sefydliad</i> Your name / organisation	Sarah Eyles, Director, Isles Computer Services Ltd., T/A Sunny Bank Solar I am sending this as both a resident and a director of a solar farm
1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau? 1. Which part(s) of the Plan (or supporting documents) are you commenting on?	
<i>Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle</i> LDP policy or site allocation number(s)	This is in SUPPORT of the EXCLUSION of the CANDIDATE SITE application for LAND AT HEOL MAFON LLANFIHANGEL-AR-ARTH, CARMARTHENSHIRE, SA39 9LD Originally submitted by JCR Planning on behalf of the owner (who is probably Mr. M. Evans) or any other of the owner's representatives. As this is site is not included in the current LDP it doesn't, to my knowledge, have a site allocation number.
<i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i> LDP paragraph or section number(s)	N/A as it is not in the LDP, but might be put forward for inclusion during the consultation period.
<i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i> LDP Proposals Map reference(s)	It is not on the current LDP Proposal Map, but the location is LAND AT HEOL MAFON LLANFIHANGEL-AR-ARTH, CARMARTHENSHIRE, SA39 9LD, next to my house and solar farm at Sunny Bank, Llanfihangel-Ar-Arth, SA399HX
<i>Os yw eich sylw yn perthyn i ddogfen ategol (e.e. y Gwerthusiad o Gynaliadwyedd), rhowch yr enw(au) a'r cyfeiriad(au) i mewn yma.</i>	This representation is in support of the exclusion of representation by Mr Evans, or his representatives, or the current land owner, regarding LAND AT HEOL MAFON LLANFIHANGEL-AR-ARTH, CARMARTHENSHIRE, SA39 9LD

<p>If your representation relates to a supporting document' including the:</p> <p>Sustainability Appraisal), and/or Habitat Regulations Assessment insert the name of the document and section reference(s) and/or paragraph number here.</p>	<p>Below is Mr Evan's original proposal for the candidate site, back in 2019. There might be an updated proposal that I am not aware of.</p> <p>The proposal is called F9FEAF4CC16A11E8BCB7D43D7EBF11D4.pdf and is sent with this document.</p>
<p>2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol.</p> <p><i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i></p> <p>2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.</p> <p><i>For more information on soundness and procedural requirements, see the guidance notes.</i></p>	
<p><i>Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.</i></p> <p>I think the LDP is sound and meets procedural requirements.</p>	<p>Yes, to the best of my knowledge. I am pleased that there are not many new residential properties in the village, particularly because of sewerage and water pollution issues, and to keep the current rural integrity of the village.</p>
<p><i>Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.</i></p> <p>I think the LDP is unsound and should be changed.</p>	
<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i></p> <p>I think that the procedural requirements have not been met.</p>	
<p>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</p> <p><i>Ticiwch bob un sy'n berthnasol.</i></p> <p>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</p> <p>Tick <u>all</u> that apply.</p>	
<p><i>Dyraniad safle newydd</i></p>	<p>No. This is sent because there will be no consultation period (as far as I</p>

New site allocation	know) looking at any new site proposals during this consultation period. I am, therefore, being proactive and objecting to this site, as outlined in the document, in case it is proposed.
<i>Polisi newydd</i> New policy	
<i>Paragraff neu destun ategol newydd</i> New paragraph or supporting text	
<p>4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel safle cais? Os felly, a fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).</p> <p>4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).</p>	
<i>Enw'r safle</i> Site name	<p>This is in SUPPORT of the EXCLUSION of the CANDIDATE SITE application for</p> <p>LAND AT HEOL MAFON LLANFIHANGEL-AR-ARTH, CARMARTHENSHIRE, SA39 9LD</p> <p>Originally submitted by JCR Planning, on behalf of Mr. M. Evans back in an earlier version of the LDP</p>
<i>Cyfeiriad y cais</i> Site reference	<p>I do not have your reference, as this site is not currently included in the LDP. Land at Heol Mafon, Llanfihangel-ar-Arth, Carmarthenshire, SA39 9LD is the location. I live next door to this site. I am also a director of a company that owns a solar farm next to this possible proposed site. I am sending this representation in support of excluding the site (as it is not currently in the LDP) in case Mr Evans (or the current owner of the site) sends a representation to include the site during this consultation period.</p>
<p><i>Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.</i></p> <p>If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its</p>	

proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Rhestrwch eich sylwadau isod.

Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/profion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

I attach with this form: **Objection to building proposal SA39 9LD.pdf** which is also included below in this form in full:

**OBJECTION TO SUBMISSION FOR
PROPOSED BUILDING ON:**

**Land At Heol Mafon Llanfihangel-Ar-Arth,
Carmarthenshire, SA39 9LD**

**Originally put forward by JCR Planning
on behalf of Mr. M. Evans - originally**

Their ref: 0674.a/CLJ/18 Date: July 2018 Prepared by: CLJ

**Or any other similar proposals put forward in the LDP
consultation period in 2023.**

OBJECTION SUBMITTED BY:

Sarah Eyles, Sunny Bank,

Llanfihangel-Ar-Arth, Carmarthenshire, SA39 9HX

Overview

I have lived at Sunny Bank, Llanfihangel-Ar-Arth for ^{over} 18 years, and in 2015 I built a 168kWp Large Scale Solar farm on the land I own behind my house.

The objection I am making is to a proposed development of four detached dwellings on land bordering my property to the West.

In July 2018 JCR Planning submitted a candidate application to the Local Development Plan (LDP) - 2018 – 2033 on behalf of Mr Evans for four residential developments on a plot on the outskirts of Llanfihangel-Ar-Arth, outside of the current 'red line' of the village.

I understand from Bethan Lovering, Forward Planning Officer, that this candidate submission has not been included in the LDP, but that Mr Evans can make a representation to the Deposit LDP consultation, which is scheduled for December/January, for the inclusion of his submission.

This document sets out several objections to the proposed buildings, and is being submitted in response to Mr. Evan's representation to the Deposit LDP consultation and any subsequent representations for the site to be included for his proposed building project, in its present form.

Location of Site

Below is a map 'Ordnance Survey', showing the location of the proposed building site, my home: Sunny bank, and the location of the Large Scale Solar.

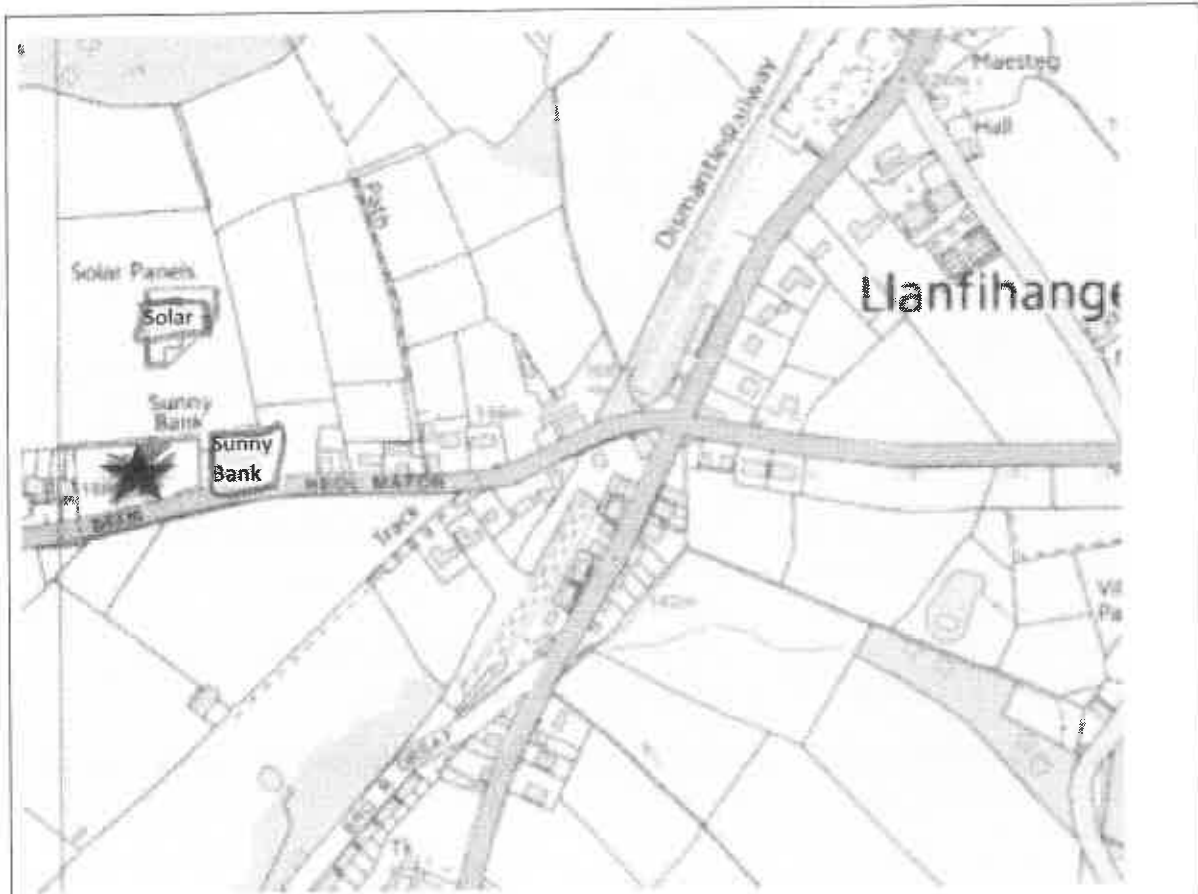


Fig. 1 – Proposed Building Site (red star)

Fig. 2 – Large Scale Solar farm location (letters in red)

Fig. 3 – Location of Sunny Bank (letters in red)

Objection 1 – Shading of Large Scale Solar farm

Back in 2015, when I applied for planning permission for the 168kWp Solar Farm, for on the land behind my house, there was nothing in the vicinity of the proposed site that caused shading onto the solar panels.

Shading reduces effectiveness of Solar panels. Just 10 per cent shading of a solar PV panel can result in a 50 per cent decline in efficiency according to some reports. This is due to the way the solar cells in an array are connected within the system. Shading, if persistent, can also permanently damage solar panels.

Any proposed building project close to a Solar farm needs to keep the ridge height of the building 15-20 degrees below the solar panel arrays. This has not been considered within Mr Evan's submission, and no impact assessment, or even a suggestion that one might be required, has been included.

Indeed, in 2.1.12 of the Candidate Supporting Statement submitted by JCR Planning on behalf of Mr Evans, it states:

In summary therefore, there is no physical amenity feature within or adjacent to the site that will prevent its appropriate, future, efficient development

This is simply not the case. The development, as it stands, will almost certainly impact the Large Scale Solar farm because of the shading it will produce.

I have a plot, with full planning permission, between the proposed site and my house, which is currently on the market. However, this is a dormer bungalow and will therefore not impact on the solar panels efficiency because of the height of the building.

In addition, Sunny Bank itself although a two floor dwelling, is downhill from the proposed building site, and does not cause shading which materially impacts on the efficiency of the Solar farm.

In Wales there is a recent Council resolution of the declaration of a Climate Emergency. The UK Renewable Energy Strategy, July 2009, sets out the Government's path to secure 15% of the Country's energy from renewable sources by 2020. Local planning authorities need to help deliver this target through the planning system and demonstrate how they are planning for a low carbon future in a changing climate. .

The Large Scale Solar I built in 2015 was created as part of the government's initiative to ensure that this 2020 target was met, and I have personally invested £250,000 of my own money at my own risk in the project. I did this in good faith at the time of putting forward my planning application, having ensured that there was nothing overlooking the space that would cause shading and damage the efficiency of the solar farm.

The LDP and the Local Authorities need to ensure that all aspects of Sustainable Village developments are respected, and that existing Sustainable Village developments are not destroyed or impaired in order to provide new facilities.

I would further note that in the Llanfihangel-Ar-Arth LDP there is a substantial building site at Suv39/h1 on the LDP site map, but no provision for Solar or Wind renewables. My Large Scale Solar is the only one in the village.

Objection 2 – Western Power Distribution powerlines crossing the proposed site

There are two sets of powerlines crossing the proposed building site. Please see the map below, provided by Western Power. The proposed building site is outlined in black.

These power lines are as follows:

The 11,000 volt line is highlighted in red.

The 33,000 volt line is highlighted in blue.

On contacting Western Power Distribution, I spoke to Anthony Hamid and was informed of the following:

- Any new development must be 3 meters away – under or sideways – from powerlines.
- The 33,000 volt line is 6 to 7 meters from the ground.
- The 11,000 volt is 6 meters from the ground.

Mr Hamid also expressed surprised that WPD, as a stakeholder, had not been consulted or informed about this candidate submission.

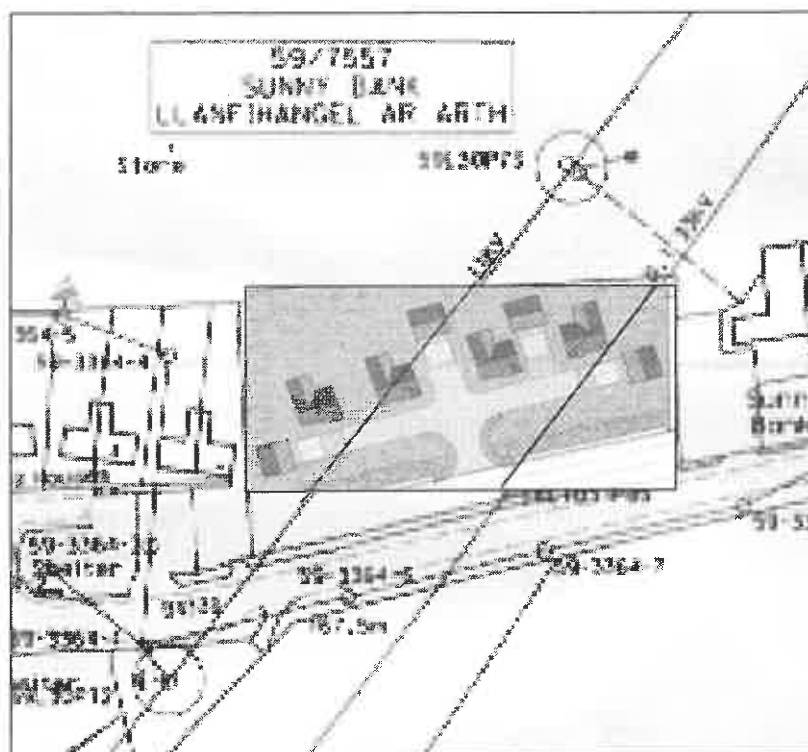
The 11,000 volt line pole (shown in the yellow circle) houses the apparatus to input the energy generated by the Large Scale Solar farm into the grid. For this reason, this pole cannot be relocated.

In addition, I would not want either of these powerlines moved anywhere else across my land because of other projects I am undertaking: For example, I have a plot (with full planning) bordering the site that I am currently in the process of selling with an half acre paddock.

I have made cursory enquiries with neighbours, and it does not appear that there is much appetite to have further powerlines located across their land either.

However, obviously the onus is not on a neighbour to suggest powerline relocation plans, and I would have thought that this issue, and how it is to be dealt with, would have been outlined, at least in brief, in the candidate's proposal, with corroborating information from WPD, but this appears to have been omitted.

Below is a superimposure of the proposed dwellings, as provided in Mr Evan's candidate application, and their proximity to the existing powerlines. From this map one can roughly ascertain that 2 or 3 out of the 4 dwellings would be within 3 meters of one of other of the powerlines that currently cross the plot.



I do not see that this development is possible, as it stands, because of the location of these powerlines. The implicit assumption in the application appears to be that it will be acceptable to reroute these powerlines over neighbouring land, without any consultation with stakeholders.

I cite again 2.1.12 of the Candidate Supporting Statement submitted by JCR Planning on behalf of Mr Evans, where it states:

In summary therefore, there is no physical amenity feature within or adjacent to the site that will prevent its appropriate, future, efficient development

This assertion is simply not the case, and stakeholders, namely neighbours and WPD, have not been informed or consulted about the rerouting of two major powerlines which currently cross the proposed site.

Summary

The objections I have made outline two ways that this development could directly and adversely impact both my business, the Large Scale Solar farm, and my property.

I have no objection in principle to new developments in the village, but not that they impact existing dwelling or businesses in the village. There are many 'cross-

cutting' themes to a Sustainable Village, and new facilities should not be added at the cost of existing developments.

In Summary, my objections to this development are:

- The height of the dwellings, which if two stories, will shade the Large Scale Solar farm, impacting the efficiency of the solar by up to 50% and could permanently damage the solar panels. Surely, the onus is on the developer to ensure that any new developments close to an existing Large Scale Solar farm do not adversely impact the solar panels, and the onus is on the local authorities to not to allow this to happen.
- That no provision has been made as to how the proposed four new developments will be built under two powerlines, and stakeholders (namely, neighbours and WPD) have not been engaged with on this issue. The implicit assumption within the candidate submission being that these powerlines can be rerouted over neighbouring land, when it appears that such permission is unlikely to be granted.
- That the pole nearest my Large Scale Solar farm must not be relocated because of the AC/DC apparatus that it needs to be in close proximity to the Solar farm to enable transfer of renewable energy back into the grid.

In addition, as the proposed site is uphill of my property, I am concerned that extensive building on the field will reduce rain absorption into the land and will cause a problem of water runoff onto my property. I currently manage a little runoff, but as this is a hilly area this could cause a big issue, resulting in flooding and possibly land movement.

I understand that it is the uphill neighbour's responsibility to prevent runoff to downhill neighbours, but I have a feeling that the 'before' and 'after' position might be hard to prove. In addition, there are properties below me that could also suffer.

Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.

Tick here if you are submitting additional material to support your representation.

Yes I am. Tick.

F9FEAF4CC16A11E8BCB7D43D7EB F11D4.pdf - *included in this envdy*

Objection to building proposal SA39 9LD.pdf - *also included in this text*

6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon a'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer hefyd y bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol ar gyfer darparu ar gyfer y rhain sydd eisiau rhoi tystiolaeth lafar.

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

Rwyf am siarad mewn sesiwn gwrandawriad.

I want to speak at a public hearing.

I am happy to speak if this will help my case.

Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.

7. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

Rwy'n dymuno cael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

*Rwy'n dymuno cael fy nghlywed yn
Saesneg.*

I wish to be heard in English.

Yes, my Welsh is too basic.

Nodiadau cyfarwyddyd

Guidance notes

*Caiff Cynllun Datblygu Lleol Sir Gaerfyrddin ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.*

'Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:

- 1. Ydy'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)*
- 2. Ydy'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)*
- 3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)*

Darperir rhagor o wybodaeth am y profion cadernid a gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.

Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.

Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu

The Carmarthenshire Revised Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the

hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio am fwy nag un newid i'r Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.

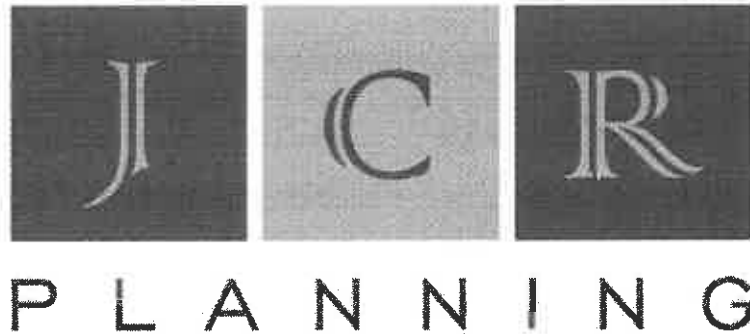
Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid nodi cynrychiolydd y grŵp (neu'r prif ddeisebydd) yn glir.

Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.

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CANDIDATE SITE SUPPORTING STATEMENT
CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN REVIEW
2018-2033

LAND AT HEOL MAFON
LLANFIHANGEL-AR-ARTH, CARMARTHENSHIRE, SA39 9LD

on behalf of

Mr. M. Evans

Our Ref: 0674.a/CLJ/18
Date: July 2018
Prepared by: CLJ

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CANDIDATE SITE: OVERVIEW

This submission is a site assessment methodology prepared to demonstrate that the development of an area of land at Heol Mafon, Llanfihangel-ar-Arth, has the potential to contribute to the strategic aims and objectives of the soon to be reviewed Carmarthenshire Local Development Plan.

This submission seeks an amendment to the specific alignment of the Carmarthenshire Local Development Plan guidelines, in the vicinity of Heol Mafon. The current development guidelines for Llanfihangel-ar-Arth adjoin the candidate site. This submission requests that the plan be revised to include the submitted candidate site within the development limits for Llanfihangel-ar-Arth and thus provide for the future housing needs of the local area.

1.0 INTRODUCTION

- 1.0.1 JCR Planning has been instructed by Mr. M. Evans (the landowner) to prepare a candidate site submission in respect of the allocation of an area of land at Heol Mafon, Llanfihangel-ar-Arth. The purpose of the submission is to seek the site's allocation for residential development in the forthcoming replacement Carmarthenshire Local Development Plan (2018 – 2033).
- 1.0.2 This submission has been prepared in accordance with the Local Authority's published documents:-
- *'Revised Carmarthenshire Local Development Plan: Guidance Note'*
 - *'Revised Carmarthenshire Local Development Plan: Candidate Site Assessment Methodology'*.
- The contents of this submission therefore address the relevant criteria within these documents, thus allowing a considered determination and evaluation.
- 1.0.3 Recognition has also been given to ensuring that this formal submission complies with the guidance and requirements of *'Planning Policy Wales (Edition 9)'* and associated Technical Advice Notes, and other advisory guidelines issued by the Welsh Government.
- 1.0.4 This submission provides a comprehensive case for the allocation of the candidate site for residential development purposes, and should be considered in conjunction with the accompanying illustrative site layout plan.
- 1.0.5 In order to assist the Local Planning Authority in its deliberations, JCR Planning is prepared to supply any additional information that may be required and to arrange for a site inspection if deemed necessary.

2.0 SITE CONTEXT

2.1 THE CANDIDATE SITE

2.1.1 The candidate site and its relationship to Llanfihangel-ar-Arth is highlighted in the 'Ordnance Survey' extract at Figure 1. (The candidate site's location is indicated by a red star.)

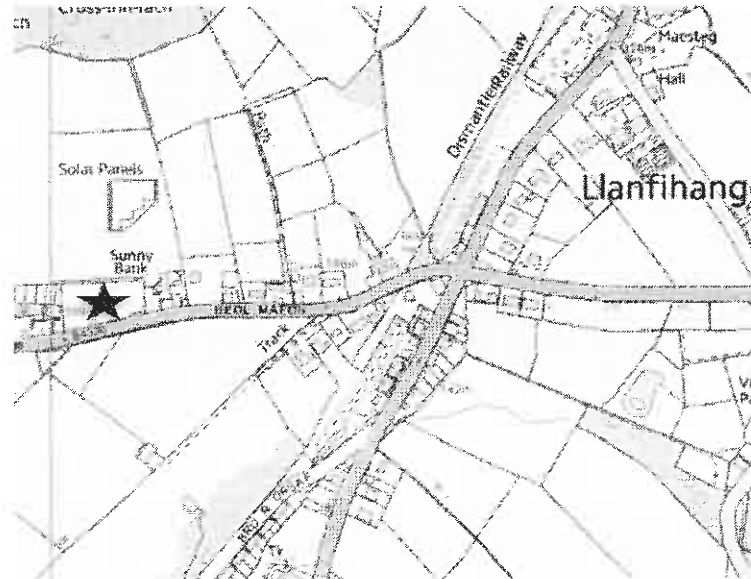


Fig. 1 – Relationship of candidate site to Llanfihangel-ar-Arth

2.1.2 Figure 2 is more detailed, with a red line identifying the spatial extent of the candidate site. The candidate site comprises a tract of agricultural land which measures approximately 0.43 ha.

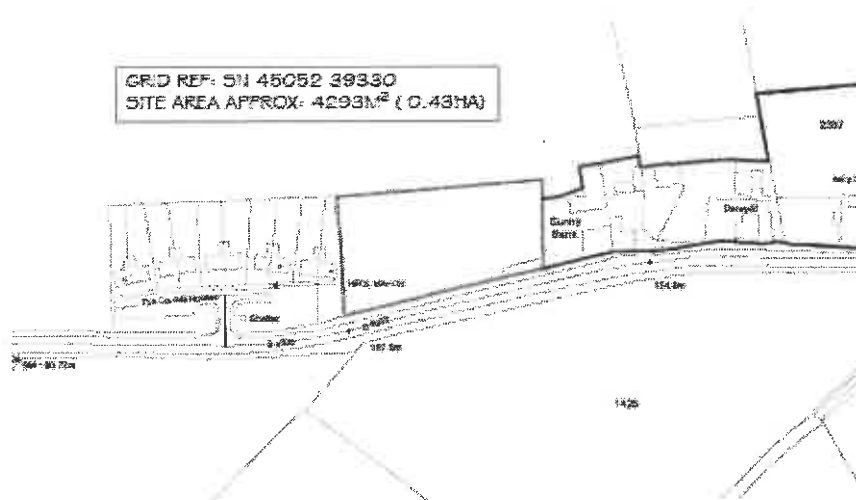


Fig. 2 – Candidate site boundaries

2.1.3 *Figure 3* provides an aerial image of the candidate site and its surroundings.

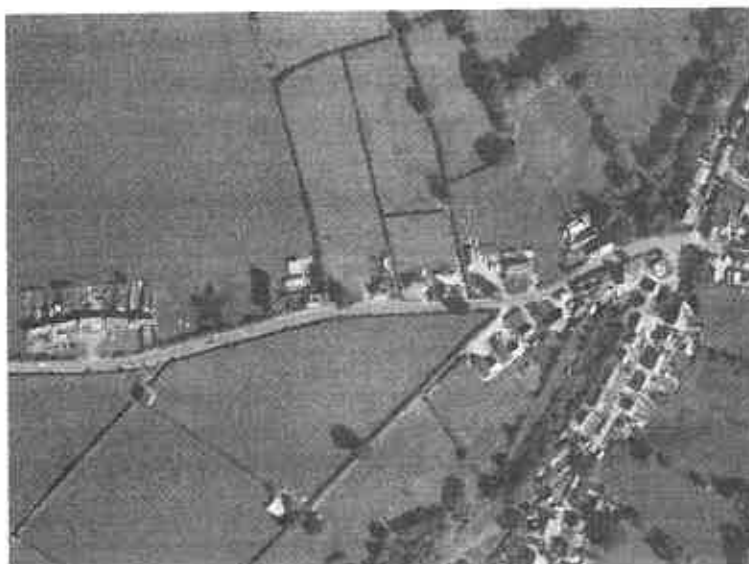


Fig. 3 – Candidate site aerial image

- 2.1.4 The candidate site is situated on the western fringes of Llanfihangel-ar-Arth and is directly related to the existing built form, providing a logical 'infill' opportunity. The site's northern boundary is formed by adjoining agricultural land, whilst its southern boundary comprises Heol Mafon itself. The site's western and eastern boundaries are formed by adjacent residential curtilages.
- 2.1.5 The candidate site consists of semi-improved grassland and as noted above, the boundaries are well-defined by physical features.
- 2.1.6 The relationship of the candidate site in terms of proximity to the adjacent highway is shown in *Photographs 1 and 2*. The photographs also emphasise the close relationship of the frontage of the site to the adjacent highway. The road alignment at this point provides good horizontal and vertical visibility in both directions, allowing the site to be served by a safe and efficient access.
- 2.1.7 The proposed access into the candidate site will be sited direct from Heol Mafon, with all due consideration being given to safety. The necessary visibility splays can be readily achieved by means of the careful translocation of the existing hedgerow.
- 2.1.8 Topographically, the candidate site has a slight gradient as is shown in *Photograph 3*. The site does not contain any landscape or other physical features of note and neither does it have any recognised amenity value. The site does not contain any trees. Neither the Local Planning Authority nor its predecessors have ever deemed it

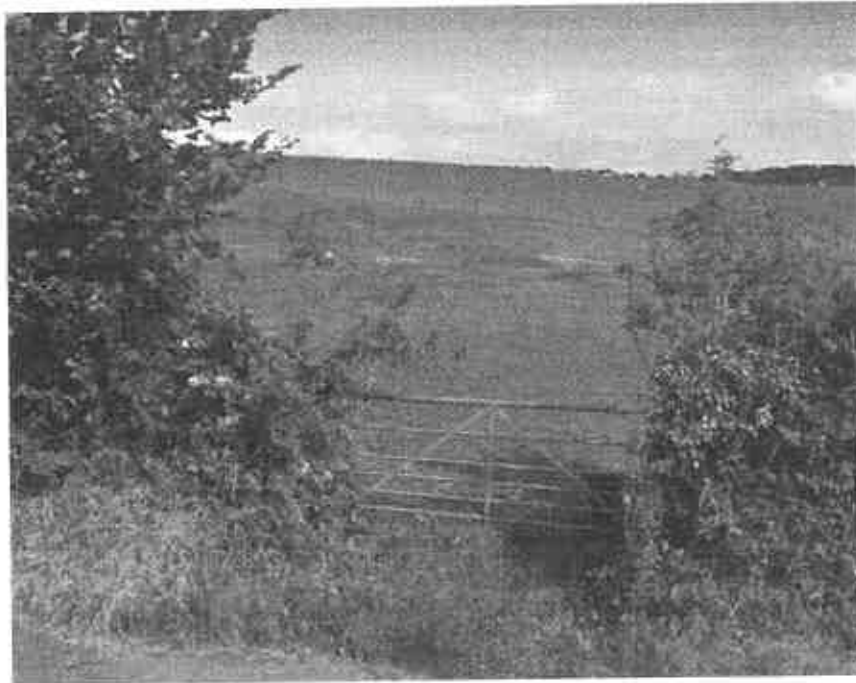
appropriate to include the candidate site within any landscape protection zone. Its present state and condition can be aptly described as semi-improved grassland.



Photograph 1 – Visibility looking west



Photograph 2 – Visibility looking east



Photograph 3 – General view of candidate site

- 2.1.9 The general area is characterised by detached properties of a significant size that take advantage of the road frontage aspect. The proposed scheme for the candidate site reflects the existing frontage development style.
- 2.1.10 The development limits in this area reflect the legacy of the incremental development that has occurred in the locality. The candidate site is bounded by residential development to the west and east. It is evident that the site has an extremely close physical relationship to the settlement's built form.
- 2.1.11 The existing agricultural access to the candidate site will be upgraded to provide a convenient means of vehicular access for the proposed development. The anticipated level of traffic generated by the additional residential development at this location (4 no. dwellings) will not create any highway capacity or safety problems. The Local Planning Authority itself is unlikely to raise any specific highway issues relating to the development of this site, given the adequacy of potential visibility splays. Access to the site can be secured on the southern boundary fronting Heol Mafon.
- 2.1.12 In summary therefore, there is no physical amenity feature within or adjacent to the site that will prevent its appropriate, future, efficient development.

2.2 SETTLEMENT SUSTAINABILITY AND SITE SETTING WITHIN THE CURRENT LOCAL DEVELOPMENT PLAN

- 2.2.1 The settlement of Llanfihangel-ar-Arth is currently identified in the Carmarthenshire Local Development Plan as being part of a sustainable community (SC20), and therefore by definition, its sustainable development credentials are already acknowledged and confirmed.
- 2.2.2 More specifically, in terms of accessibility, Llanfihangel-ar-Arth is situated within a convenient distance of nearby Llandysul (approximately 4.3 kilometres) and its wide range of services and facilities, including convenience shops, specialist retailers, public houses, recreation facilities, employment opportunities, medical surgery, library, and primary and secondary schools.
- 2.2.3 Llanfihangel-ar-Arth provides some community facilities and is situated on the 621 Bwcabus service route, providing regular access to nearby Pencader and Llandysul. The candidate site is itself in close proximity to two bus stops and is also within convenient walking distance of the village centre and bus stop. There are a number of various light industrial/commercial premises at the northern fringe of the village providing important employment opportunities for the local population.
- 2.2.4 The sustainable development credentials of Llanfihangel-ar-Arth should therefore be given full recognition and consideration when determining potential future growth options within communities.
- 2.2.5 Under the spatial strategy of the current Carmarthenshire Local Development Plan, the candidate site adjoins the development limits for the settlement of Llanfihangel-ar-Arth. This spatial relationship is shown in the extract from the Carmarthenshire Local Development Plan Proposals Map at *Figure 4*.
- 2.2.6 The locational advantage of the candidate site is confirmed by its adjoining relative position to the existing defined development limits for Llanfihangel-ar-Arth.
- 2.2.7 At present, Llanfihangel-ar-Arth's development limits tightly hug the existing settlement form. The candidate site's location and proposed use confirm its status as a natural and logical 'infill' opportunity along Heol Mafon.
- 2.2.8 In terms of planned growth, the candidate site forms part of a sustainable community within the current Local Development Plan, namely SC20. Within this sustainable community, only a minor amount of residential development has been allocated, with little indication of commencement.

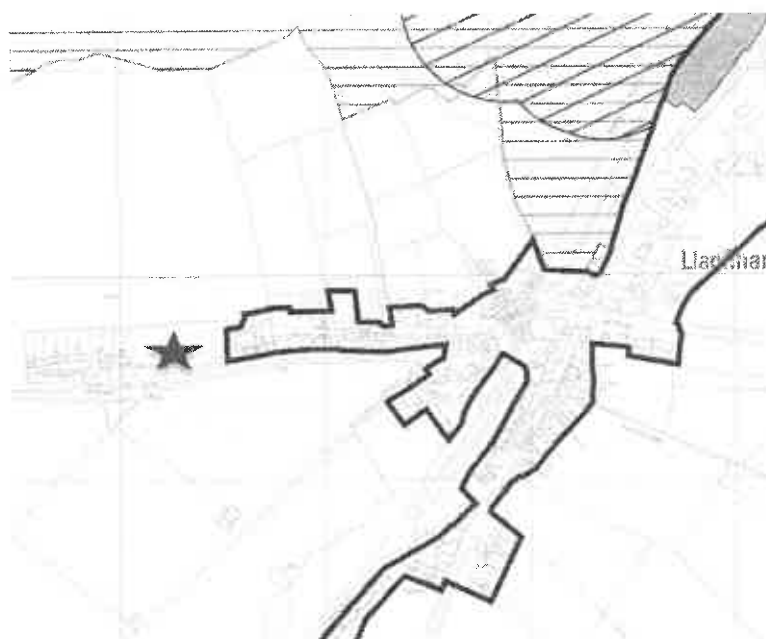


Fig. 4 – Carmarthenshire Local Development Plan extract

2.2.9 It is understood that the low rate of residential development within SC20 has been identified and acknowledged by the Local Authority through its own assessment of current Local Development Plan residential allocations. In a report to Full Council in January 2018, all allocations were categorised as being either ‘red’, ‘amber’ or ‘green’ in terms of their anticipated deliverability. Those allocations included within the red banding were considered the least deliverable, or incapable of being delivered at all, and are highlighted in *Table 1*.

LDP Ref.	Site Name	Units
SC20/h1	Adj. Yr Hendre, Llanfihangel ar Arth (Red)	8
SC20/h4	Bro'r Hen Wr, Pencader (Red)	17

Table 1 – ‘Red’ allocations in the current Local Development Plan

2.2.10 It is apparent that there are 25 units within ‘red’ allocations, one of which, SC20/h1 (adj, Yr Hendre) is located in Llanfihangel-ar-Arth itself. There are also a further two allocations (49 units) within SC20 which are classified as ‘amber’. These allocations are yet to be delivered, three and a half years since the plan’s adoption, despite the majority also being previously allocated in the Carmarthenshire Unitary Development Plan. Therefore, despite being earmarked for development for over 12 years, they have failed to deliver an appropriate level of new housing development within SC20.

2.2.11 The net result of the lack of development within SC20 means that Llanfihangel-ar-Arth's ability to grow and capitalise on its sustainable attributes has been held back. These existing allocations have not made any contribution to the housing stock since the time of Local Development Plan adoption, and even Unitary Development Plan formulation. The deliverability of these longstanding allocations is now clearly in doubt and so, in order to address this deficit in provision, and capitalise on the sustainability of the settlement, more deliverable residential allocations are urgently required.

2.2.12 The designation of the submitted candidate site as a residential allocation in the forthcoming Carmarthenshire Local Development Plan will assist in addressing the imbalance and provide much needed residential accommodation within both Llanfihangel-ar-Arth and the SC20 sustainable community.

3.0 NATIONAL PLANNING POLICY CONSIDERATIONS

3.0.1 In the preparation of a development plan, consideration must be given to national planning policy and guidance. At present, this takes the form of *Planning Policy Wales (Edition 9)* (PPW) and a series of *Technical Advice Notes* (TANs) that deal with a range of topic areas.

3.0.2 With regards to residential development, the overarching requirements and principal guidance set by national policy can be found at paragraph 9.2.3 of PPW, which reads as follows:-

“Local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types.”

3.0.3 At present, Carmarthenshire County Council’s housing supply figure is significantly below the required 5 year level (3.8 years supply in 2018) and it is therefore imperative that this is addressed as quickly as possible to avoid further deterioration of communities, as well as facilities and services within settlements. The formal review of the Carmarthenshire Local Development Plan will assist in addressing this issue, but only if truly sustainable and deliverable allocations are identified, to replace many of the failing sites that currently form part of the Authority’s housing and growth strategy for the county.

3.0.4 Dealing specifically with the candidate site that is subject of this submission, it is evident that its inclusion within the forthcoming replacement Local Development Plan would adhere to the requirements of paragraph 9.2.3, in that it is free from any planning, physical or ownership constraint. In addition, as demonstrated later in this submission, the site is also economically viable in deliverability terms.

3.0.5 Paragraph 9.2.9 of PPW provides authorities with more specific guidance in selecting sites for allocation for residential development. In terms of this candidate site, it is considered that all relevant criteria listed in paragraph 9.2.9 are satisfied, including the following:-

- The location of the candidate site is sustainable in terms of its proximity to a range of community facilities, local services and public transport services.

- The physical and social infrastructure of the settlement is capable of accommodating the proposed development without detriment to any interest.
- The candidate site is not subject to any physical constraint such as flood risk, ground instability, ecological interest, historic assets or contamination that would prevent its delivery.
- The development of the candidate site for residential purposes would be compatible with existing adjoining land uses, and its form contained by firm, defensible perimeters.

3.0.6 PPW promotes the notion of sustainable development as being central to all planning decisions in Wales. It defines sustainable development as development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

3.0.7 Similarly, in terms of providing a framework for the provision of housing, one of the key policy objectives of PPW is to provide greater choice for people in the type of housing available as well as options for preferred locations.

3.0.8 This fundamental ambition manifests itself through the regulatory role of the planning system, which aims to ensure that new homes are provided in the right place and at the right time.

3.0.9 Similarly, it has long been established that new housing developments are expected to be well-integrated with, and connected to, the existing pattern of settlements and should avoid creating a fragmented development pattern. Importantly there is also a recognition that new housing will continue to be required in order to sustain healthy economic activity and the viability of communities. Llanfihangel-ar-Arth can accommodate a modest level of development without damage to its character or to the surrounding countryside. New housing would help to sustain this settlement by providing additional critical mass for maintaining local services and facilities.

3.0.10 Essentially, directing new development and investment to those locations that already have a range of facilities and services, has the effect of minimising the distances between trip origin and destination, thus reducing the propensity for additional private car travel.

3.0.11 The inclusion of the candidate site within the development limits for Llanfihangel-ar-Arth would reflect both national planning guidance, in terms of focusing development in sustainable locations, as well as the sustainable development policies promoted in the current Carmarthenshire Local Development Plan. The candidate site would help secure the development plan's strategic residential land supply and its inclusion would not create any amenity, highway or utility service provision difficulty.

3.0.12 In summary therefore, the allocation of the candidate site would adhere to and support the objectives, principles and requirements of national planning policy.

4.0 THE PROPOSAL

4.0.1 In order to demonstrate the suitability of the candidate site for residential development, this submission is accompanied by an illustrative site layout for a potential residential scheme. It should be emphasised that the accompanying site layout is for illustrative purposes and that other alternative design solutions for the candidate site could also be readily devised. Notwithstanding this, the suggested site layout has taken account of all potential site assets, as well as anticipated constraints. The following information therefore expands upon the principles depicted in the submitted layout plan.

4.1 DEVELOPMENT OVERVIEW

4.1.1 It is proposed that the candidate site be allocated for residential development in the forthcoming replacement Carmarthenshire Local Development Plan for a total of 4 detached open market dwellings. The accompanying illustrative site layout (reproduced at *Figure 5*) demonstrates that the candidate site is capable of accommodating the proposed number of dwellings in a deliverable, efficient and sustainable manner. The illustrative layout shows a frontage development.

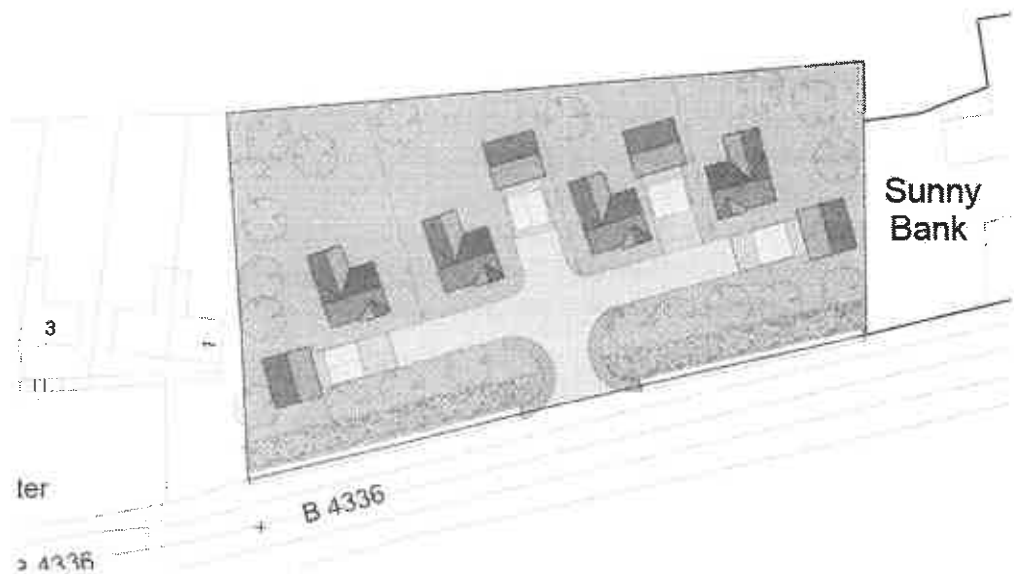


Fig. 5 – Development option for candidate site

4.1.2 The success of the submission rests with the type of housing that is being proposed, namely, high quality open market dwellings. There is a shortage of such

accommodation in the locality and the candidate site would provide an important opportunity for such a development.

- 4.1.3 The candidate site is readily capable of accommodating 4 dwellings, reflecting the existing form and low density of residential development in the immediate locality.
- 4.1.4 With regards to access, it is proposed that the candidate site be served directly from Heol Mafon, by means of the upgrading and widening of the existing agricultural access. The careful translocation of the frontage hedgerow would be undertaken, in order to form the required visibility splays. This stretch of highway is subject to a 30-mph speed limit, and thus, visibility splays of 2.4m x 59m can readily be achieved, by virtue of the straight alignment of the highway.
- 4.1.5 The illustrative site layout retains all existing trees and boundary treatments, which would be managed as part of a landscaping strategy.
- 4.1.6 Due to the site only accommodating 4 dwellings, it is acknowledged that financial contributions will be made to support affordable housing elsewhere in the locality, which under the provisions of the current Local Development Plan would be based on a financial sum per square metre ratio.
- 4.1.7 The illustrative layout demonstrates that an appropriate residential scheme can be readily devised for the site without any environmental impact or harm to any third party interests.

4.2 INFRASTRUCTURE CONSIDERATIONS

- 4.2.1 The candidate site's proposed development for residential purposes would be served by mains water, foul drainage and electricity connections, which are conveniently located to the site.
- 4.2.2 As regards surface water, the adjacent highway is equipped with roadside gullies and drainage which aid to discharge run-off from the carriageway. The proposed access road to the site could connect to the existing highways drainage as part of an adoptable estate road system. Alternatively, the incorporation of a SUDS drainage scheme, in accordance with forthcoming Welsh Government advice, is readily achievable and feasible.
- 4.2.3 The candidate site comprises agricultural grazing land. There are no areas of marshy grassland or water-logging evident, and therefore at first inspection, it appears that the site benefits from efficient ground percolation of rainwater.

-
- 4.2.4 Soakaways would provide the most sustainable means of surface water disposal. If required, attenuation measures could be introduced on site to control surface water run-off during extreme storm events, which could also allow for additional capacity, making allowances for climate change. Such features can be hard or soft engineered in the form of small subterranean storage tanks or surface storage ponds.
- 4.2.5 The illustrative site layout confirms that the candidate site can be developed in an efficient and effective manner, with all highway, amenity and utility service provisions satisfied. The layout is in-keeping with the character of the surrounding area and will provide a defined development opportunity for the local area.

- 5.1.5 It is considered that the development of the candidate site will not be impeded by any statutory and non-statutory environmental designations which are sufficiently and significantly distant.

5.2 HISTORICAL ASSETS

- 5.2.1 The candidate site has been assessed for any proximity to known and designated historic assets, using the 'Cof Cymru – National Historic Assets of Wales' from CADW's website. An extract from 'Cof Cymru Assets' map for Llanfihangel-ar-Arth is reproduced below as *Figure 7*.



Fig. 7 – Cof Cymru extract

- 5.2.2 Neither the candidate site, nor the adjoining area, contain any listed buildings, nor is the candidate site in close proximity to a conservation area. In addition, there are no scheduled ancient monuments (SAM) within or adjoining the site. As a result, the candidate site's development would not have any detrimental impact on the setting or interest of any nearby historical asset.

5.3 ENVIRONMENTAL CONSTRAINTS

Potential for Risk from Flooding

- 5.3.1 The candidate site has been assessed against the Development Advice Maps (DAM), prepared by 'Natural Resources Wales', and as referred to within the Welsh Government's 'Technical Advice Note 15: Development and Flood Risk' (2004). An extract from the DAM map is reproduced below as *Figure 8*.



Fig. 8 – NRW DAM extract

- 5.3.2 The above extract shows that no part of the candidate site is situated within any designated flood zone, and thus the potential development of the site is not compromised by either fluvial or tidal flooding.
- 5.3.3 An examination has also been made of Natural Resources Wales' records relating to potential surface water flooding. *Figure 9* is an extract depicting areas of land in the locality of the candidate site which are susceptible to surface water flooding. It is evident that there is no risk to potential residential development in this respect.

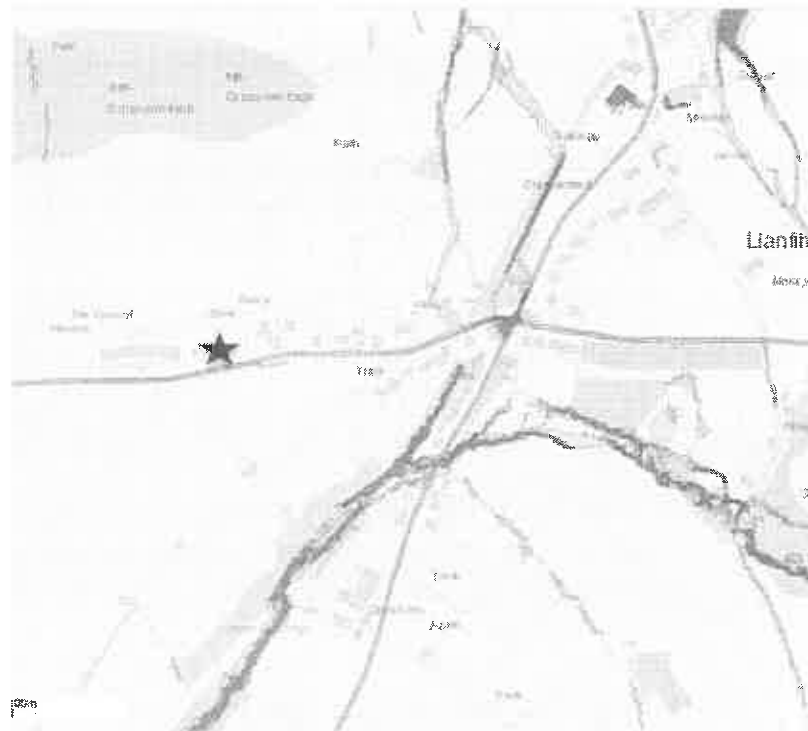


Fig.9 – NRW surface water flooding extract

Potential for Ground Contamination and Coal Mining Activity

- 5.3.4 Significant areas of Carmarthenshire have historically been the subject of coal mining activity and Coal Authority records have been examined to ascertain the presence of mine entries, adits or seams of shallow coal and mine workings.
- 5.3.5 The Coal Authority records reveal that the candidate site lies outside the South Wales coalfield area and is not affected by any coal mining activity.
- 5.3.6 The candidate site has no ground stability related constraints to its proposed development.
- 5.3.7 Due to its greenfield nature and agricultural use, the candidate site has no ground contamination related constraints.

6.0 VIABILITY

6.0.1 The fact that the candidate site is being proposed for less than 5 dwellings means that on-site affordable housing provision requirements do not apply. The required standard contributions per square metre to affordable housing will be provided.

6.1 DELIVERABILITY

6.1.1 In terms of deliverability, it should be firstly noted that as shown, the site is financially and physically viable, with no environmental, geo-physical or technical constraints prohibiting immediate development. Furthermore, there are no ownership or third-party interests preventing the site's delivery.

6.1.2 With a developer secured, the development target is established to be within five years from adoption of the replacement Local Development Plan.

6.2 APPRAISAL

6.2.1 The justification for the inclusion of the candidate site within revised development limits for Llanfihangel-ar-Arth is derived from national planning policy, as well as the physical attributes of the site itself. The development of the candidate site would satisfy sustainability objectives and provide considerable socio-economic advantages for Llanfihangel-ar-Arth, not least in terms of providing a guaranteed housing development for the benefit of the local community.

6.2.2 The candidate site is located within the settlement of Llanfihangel-ar-Arth which is defined as being part of Sustainable Community 20 under LDP strategic policies and is therefore regarded as a sustainable settlement. The broad principle of residential development is acceptable, given its direct relationship and close proximity to the existing built form.

6.2.3 This submission proposes a development of 4 detached open market dwellings, with a standard financial contribution towards affordable dwelling provision elsewhere in the area.

- 6.2.4 This equates to a gross development density of 9 units per hectare, which is considered to be in keeping with development generally within the settlement.
- 6.2.5 Elsewhere, opportunities for new housing land within Llanfihangel-ar-Arth are limited. The candidate site has a slight gradient, and is within defensible boundaries, and within a convenient distance of Llandysul and Pencader and their wide range of services and facilities.
- 6.2.6 The fundamental principles of development, as set out within this submission, will enable developers to produce an attractive marketable scheme with contributions made towards affordable dwelling provision.
- 6.2.7 The candidate site reflects the built form of Llanfihangel-ar-Arth and there are few other suitable sites within the settlement that offer opportunities to facilitate a high quality residential development.
- 6.2.8 By way of summary, the candidate site is entirely suitable for residential development for the following reasons:-

Compatibility with adjacent land uses

A significant proportion of the adjacent area is residential – the layout of the candidate site will be designed so as to avoid any incompatibility issues.

Site availability and deliverability during the Local Development Plan period

There are no constraints preventing the development being completed. The candidate site is readily available.

Infrastructure capacity (water supply, foul and surface water capacity)

There is adequate infrastructure capacity within the settlement to accommodate the development of the candidate site.

Accessibility to public transport

The candidate site is located within a convenient distance of a public transport corridor.

Flood risk (Zones A, B, C1 & C2)

There are no flood risk issues.

Impact upon biodiversity, protected sites and species

A site inspection will confirm that the majority of the candidate site comprises low quality agricultural land that has been extensively grazed. No significant bio-diversity

interest could be established and no protected species will be affected by the development of the candidate site.

Landscape impact

No protected landscapes will be affected.

Contaminated land

There are no land contamination issues.

Impact upon listed buildings, registered historic parks or landscape parks

There are no listed buildings or formally designated landscape areas located within or in close proximity to the candidate site.

Impact upon scheduled ancient monuments

There are no scheduled ancient monuments within or in close proximity to the candidate site.

Impact upon conservation areas

The candidate site does not form part of a conservation area.

Impact upon other environmental designations

The site does not form part of any other environmental designation.

6.2.9 In addition, the retention of all important trees and hedgerows will minimise any visual potential impact the development may have upon the surrounding settlement.

6.2.10 The required element of affordable housing contributions will be beneficial in terms of providing accommodation for the community elsewhere within the area.

6.2.11 By way of emphasis, the candidate site:-

- will help sustain the community by providing dwellings in a location that reinforces the traditional settlement pattern;
- is of modest size and is situated adjacent to existing residential development;
- would not be tantamount to development in the open countryside, as it is partly bounded by existing dwellings;
- would not result in the loss of any important amenity feature or represent an unacceptable intrusion into the landscape;
- would fully comply with established planning policies that direct development to sustainable locations in terms of proximity to facilities and public transport routes;

- will be contained within existing defensible boundaries and will not give rise to any harmful precedent for further residential development;
- represents an efficient and sustainable development opportunity;
- the site's favourable physical relationship with adjacent residential properties will enable development to be undertaken without the potential problems of overlooking, etc.;
- would not give rise to any recognised highway or utility service provision objections; but instead,
- would contribute to the local community's well-being by providing homes at a sustainable location within the context of both Llanfihangel-ar-Arth and the wider SC20 sustainable community.

7.0 CONCLUSION

- 7.0.1 This submission represents a site assessment methodology which has been prepared in order to demonstrate that the development of an area of land at Heol Mafon, Llanfihangel-ar-Arth, has the potential to contribute to the strategic aims and objectives of the replacement Carmarthenshire Local Development Plan (2018 – 2033).
- 7.0.2 The inclusion of the candidate site within revised development limits for Llanfihangel-ar-Arth would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type.
- 7.0.3 The development of the candidate site would be in keeping and in character with the existing pattern of frontage development.
- 7.0.4 Although currently undeveloped, the candidate site represents a sustainable and deliverable opportunity to provide new housing within the settlement of Llanfihangel-ar-Arth. With the site capable of being readily served by utilities, together with an efficient means of access direct from the adjoining public highway, there are no barriers to its delivery within the early stages of the forthcoming plan.
- 7.0.5 The candidate site also lies within a convenient distance of the existing community services and local facilities of nearby Pencader and Llandysul, which will ensure it makes a positive contribution to both national and local sustainable development objectives.
- 7.0.6 The development of the candidate site will ensure a deliverable source of future housing for the sustainable community within which it lies, which has seen a level of under supply, both prior to and following adoption of the current Local Development Plan. The development of the site will help to redress this imbalance and it is strongly suggested that the Local Authority closely scrutinises those sites currently allocated in the development plan in terms of their suitability and deliverability. National planning policy however would suggest that, in view of the uncertainty in relation to their delivery, such sites should not form part of the replacement Local Development Plan.
- 7.0.7 The candidate site is located immediately adjacent to existing residential properties, and its development:-
- would be acceptable to both the form and character of the locality;
 - would not be detrimental to the amenity of adjacent properties;
 - would satisfy recognised housing and sustainability objectives;

- would not have a detrimental impact on the landscape or nature conservation interests.

7.0.8 The candidate site has limited amenity value and is a sustainable location. Its development would satisfy all other development considerations, such as access, parking, availability of utility services, landscaping, etc.

7.0.9 With the candidate site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery, if allocated, is assured. The site represents a sustainable candidate for future residential development.

7.0.10 For the reasons set out above, it is respectfully requested that favourable consideration is given to the inclusion of the candidate site within revised development limits for Llanfihangel-ar-Arth, therefore allowing the site to come forward during the plan period up to 2033.

