

# **Carmarthenshire County Council**

## **Deposit LDP Planning Statement**

**Land East of Llandeilo Road, Gorslas**

February 2020

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**Land East of Llandeilo Road, Gorslas**

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## 1.0 INTRODUCTION

- 1.1 This report is submitted on behalf of Union Tavern Estate in respect of land east of Llandeilo Road, Gorslas in response to Carmarthenshire County Council's Revised Deposit Local Development Plan (2018-2033) consultation.
- 1.2 Union Tavern Estate are the sole landowners of the land being promoted and are committed to delivering a meaningful contribution of high quality housing within the village.
- 1.3 It is considered that the site is deliverable, available and in a sustainable location for development, with good access to key services and facilities as well as public transport.
- 1.4 The landowner is keen to work with the Council and other stakeholders to demonstrate the suitability of the land for development and its identification as an allocation in the Revised Local Development Plan.
- 1.5 In undertaking this work we have reviewed readily available online information from the following sources:
- Google Earth;
  - Predictive Agricultural Land Classification Map;
  - Development Advice Map;
  - Historic Wales Online Map;
  - Lle Map Browser; and
  - Carmarthenshire County Council's LDP Proposal Map.
- 1.6 This report confirms that there are not considered to be any unresolvable technical constraints to the delivery of housing that cannot be successfully mitigated.
- 1.7 The following documents are enclosed with this report:
- Sites and Habitat Checklist (completed by Barton Willmore in conjunction with Habitat Matters Ltd)
  - Site Location Plan, PL-01, Barton Willmore;
  - Concept Plan, SK-01 Rev A, Barton Willmore; and
  - Extended Phase 1 Habitat Survey, Habitat Matters Ltd.

- 1.8 Section Two provides a description of the proposed development. Section Three provides a description of the site and the surrounding area. Section Four sets out the planning history of the site. Section Five summarises relevant planning policy context. Section Six summarises our appraisal of the site for residential development and Section Seven comprises our conclusions.

## 2.0 PROPOSED DEVELOPMENT

- 2.1 The proposal is for residential development, along with public open space and an area for ecological management and enhancement. Barton Willmore have produced an Illustrative Concept Plan to demonstrate how development could be accommodated within the site.
- 2.2 Whilst development densities are calculated upon an initial standard of 30 homes per hectare within Growth Areas (such as Gorslas) the current LDP (Para. 6.2.13) (equivalent to an overall site capacity of 97 homes for the site area at 3.23 hectares), the Concept Plan provides an indicative layout of how houses on the site could be accommodated along with landscape buffers and ecological enhancement informed by an Extended Phase 1 Habitat Survey. It illustrates 1.05 hectares of potential residential development land – equivalent to 31 homes (both open market and affordable housing).
- 2.3 The site is proposed to be accessed from Llandeilo Road – utilising an existing field access.
- 2.4 Ecological enhancement measures include gifting an area of land (the southern field parcel) to Carmarthenshire County Council in perpetuity to allow ongoing management to support the Marsh Fritillary – supported through the Council’s SPG applicable in this area. In addition, it is understood that under the SPG, agreed payments will be made towards the Caeau Mynydd Mawr SAC, in order to bring areas of suitable land into management for the butterfly population. Therefore, the proposed development offers considerable enhancement opportunities for the wider SAC area and will allow areas of land to be managed that could potentially be more beneficial for this species.
- 2.5 As a result of gifting this field, access to that field will be via an alternative route to the south of the area and there will no longer be any need to cross livestock and farm vehicles through the Gwendraeth Fawr. This will help reduce silt levels in the watercourse further downstream.
- 2.6 Under the proposed development, the field boundaries will be retained in situ and a 7m buffer zone formed along both sides of the internal hedges and watercourses.
- 2.7 There is an opportunity to rejuvenate the roadside hedge by carrying out a programme of coppicing, laying and planting. This work should be carried out over the winter period when plants are dormant. A combination of coppicing to approximately 150-200mm above ground level and laying suitable growth will help to thicken the hedges. Planting of species already growing on the hedges (including hazel, hawthorn and holly) will encourage the hedge to re-establish to provide valuable habitat and landscaping benefits.

### 3.0 SITE CONTEXT

#### Location and Description

- 3.1 The site is located to the east of Llandeilo Road on the north eastern side of the centre of Gorslas. It comprises a block of five separate but continuous, grassland fields, bordered by the road to the north and a small stream to the south. The fields are divided by hedgerows and lines of trees, some with ditches. The Gwendraeth Fawr flows from north-east to south-west across the site, separating the four northern fields from the fifth field.
- 3.2 The site is 3.23 hectares and is contiguous with the settlement of Gorslas within the existing LDP.

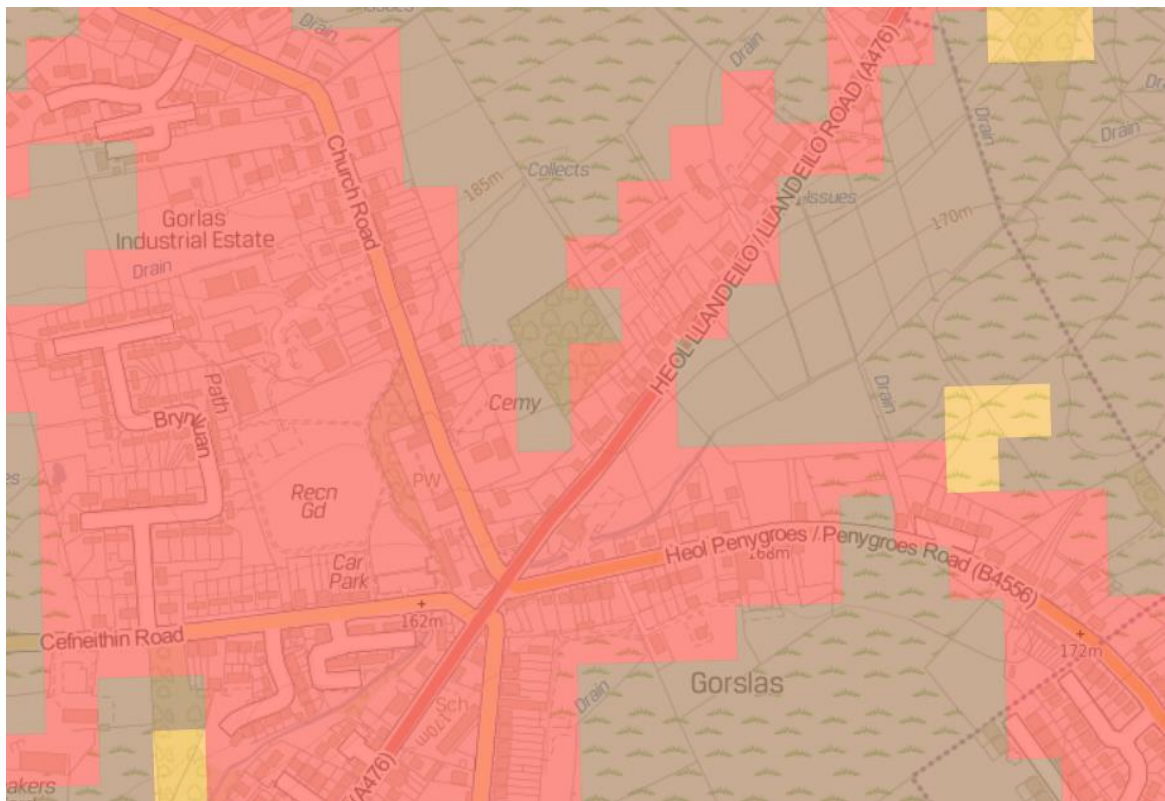
#### Figure 1: Google Earth Aerial Photograph: Illustrative Location of Site



#### Agricultural Land Quality

- 3.3 The Welsh Government's Predictive Agricultural Land Classification (ALC) Map (see **Figure 2** below) indicates that the site comprises a combination of 'urban' and Grade 5 'very poor quality agricultural land'.

**Figure 2 – Predictive Agricultural Land Classification Map Extract**



**Predictive Agricultural Land Classification (ALC) Map**

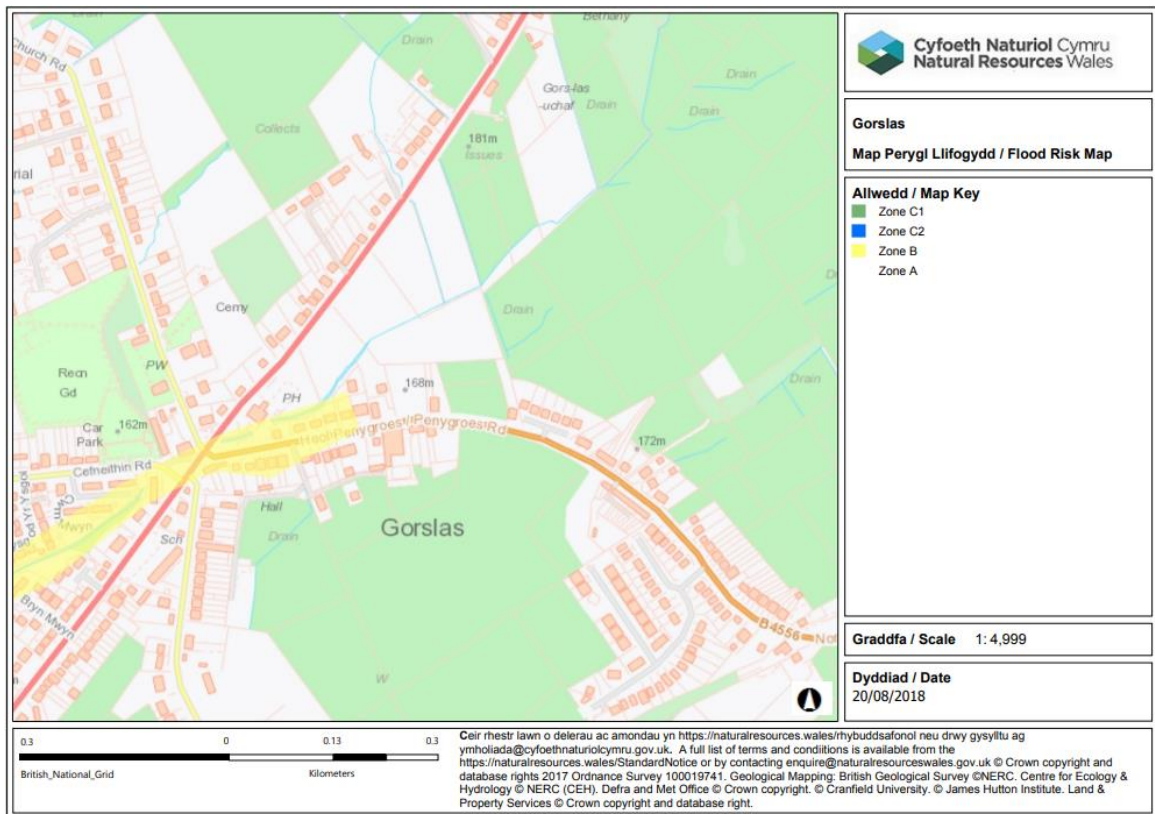
- Grade 1
- Grade 2
- Grade 3a
- Grade 3b
- Grade 4
- Grade 5
- Non Agricultural
- Urban

**Flood Risk**

3.4 The Development Advice Map (DAM) published by Natural Resources Wales (NRW) shows the entire combined site is located in Flood Zone A (considered to be at little or no risk of fluvial or coastal/tidal flooding) (see **Figure 3** overleaf).



**Figure 3 – Development Advice Map Extract**



**Historic Environment**

3.5 The Historic Wales online map (see **Figure 4** below) confirms that the site is not the subject of any historic statutory designations; there are no listed buildings or scheduled ancient monuments within the combined site area, nor are there any Welsh Archaeological Trust Historic Environment Records.

**Figure 4 – Historic Wales Online Map Extract**

### Statutory Nature Conservation Designations

- 3.6 The Welsh Government's Lle Map Browser identifies that the entire combined site is not the subject of any statutory nature conservation designations. There also do not appear to be any designated sites of nature conservation within the vicinity of the site.

### Public Rights of Way

- 3.7 Carmarthenshire County Council's Definitive Map of Public Rights of Way (PRoW) shows that there are no PRoWs within the site.

### Noise and Air Quality Mapping

- 3.8 The Welsh Government's Wales Noise Mapping Website shows that an assessment has not been undertaken for the A476. This is because noise maps are only produced for major roads across Wales.
- 3.9 The site is shown as being located within 0-10 NO<sub>2</sub>, which is the lowest possible range of NO<sub>2</sub> levels shown on the air quality data mapping.

**Tree Preservation Orders**

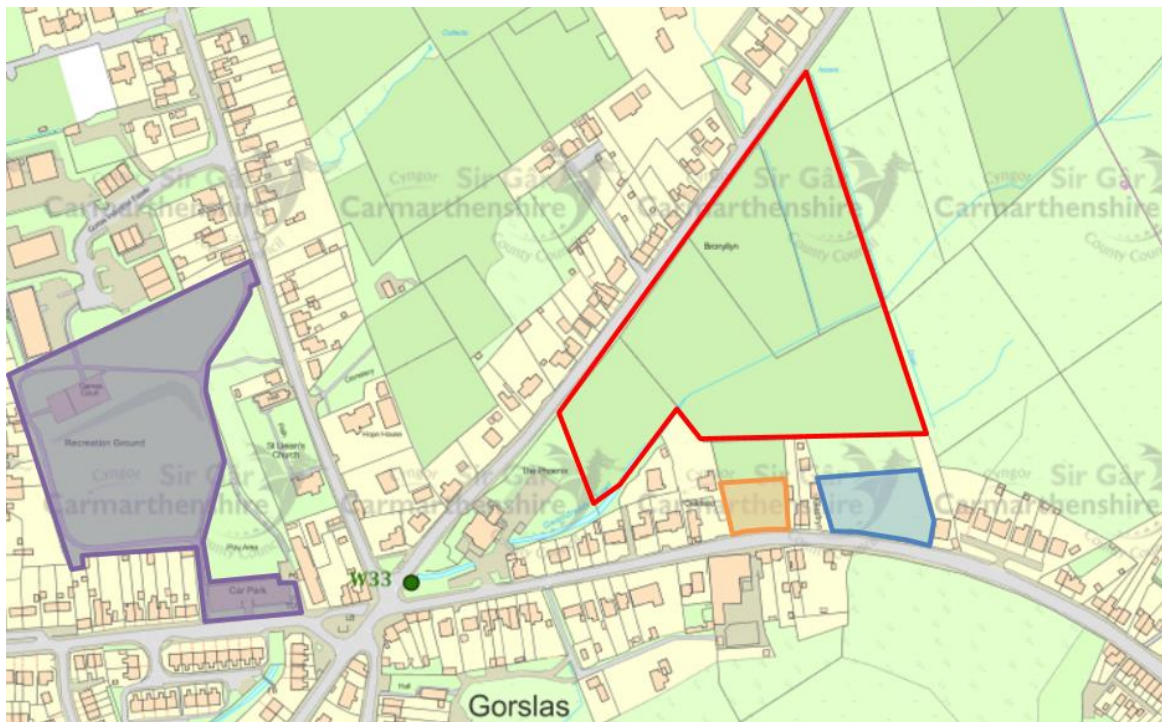
- 3.10 Carmarthenshire County Council's online Planning Information system indicates that the site is not the subject of any Tree Preservation Orders (TPO).

### 4.0 PLANNING HISTORY

4.1 There is no planning history for the site the subject of this candidate site submission. However, in order to provide context, we set out below relevant planning history of the surrounding area.

Location (colour indicates location on Fig 5)	Ref	Description of Development	Decision
Land at Penygroes Road	W/33230	Outline Application for Residential Development	Granted 18/08/2016
	W/36502	Reserved Matters to Outline Approval W/33230 – Approval for the Development of the Site for the Purpose of 6 Detached Houses	Granted 15/06/2018
Land off Penygroes Road	W/34855	Housing Development (Outline)	Granted 25/07/2017
	W/37261	Construction of Two Detached Dwellinghouses (Reserved Matters)	Granted 06/08/2018
Gorslas Recreation Park	W/36812	Construction of New Welsh Medium Primary School with Playing Field and Multi-use Games Arena to Cater for 210 Pupils and 30 Nursery Places, with Associated Landscaping, Access and Infrastructure Works	Undetermined

Figure 5 – Key Planning History



## 5.0 PLANNING POLICY CONTEXT

5.1 Section 38 (6) of the Planning & Compulsory Purchase Act 2004 confirms that planning applications should be considered in accordance with the adopted development plan unless material considerations indicate otherwise.

5.2 The development plan comprises the Carmarthenshire County Council Local Development Plan adopted December 2014. In accordance with Planning Policy Wales (Edition 9, November 2016) (PPW) LPAs must review the Plan after four years. The Authority is therefore preparing a Revised Local Development Plan.

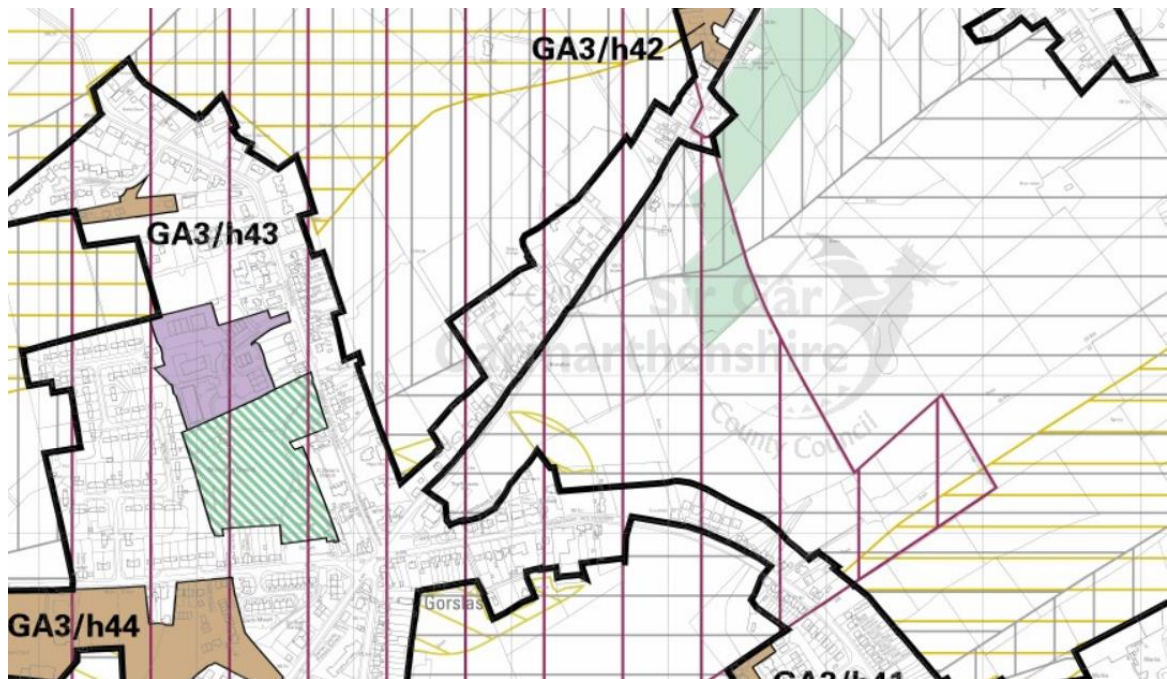
5.3 Relevant policies of the adopted LDP when appraising the site to promote it for residential-led development include, but are not limited to, the following:

- Policy SP31 states that Gorslas is identified as a Growth Area, with Policy SP5 identifying that the majority of the Plan's housing requirement will be delivered in such areas;
- Policy SP10 identifies that safeguarded minerals will not be unnecessarily sterilised by development;
- Policy SP18 states that the Council will support and promote the Welsh language;
- Policy AH1 provides that a contribution to affordable housing will be required on all housing allocations and windfall sites. The level of contribution is dependent upon the viability areas within which the application site falls;
- Policy GP1 supports development where it is in accord with a number of sustainability and design criteria;
- Policy GP4 provides support to development where the infrastructure is adequate to meet the needs of the development;
- Policy TR3 relates to the highway design and layout considerations of developments and states that proposals which do not generate unacceptable levels of traffic on the surrounding road network, and would not be detrimental to highway safety or cause significant harm to the amenity of residents will be permitted;
- Policy REC2 identifies the open space provision requirements applicable to new development; and
- Policy MPP3 states that minerals will be safeguarded within Minerals Safeguarding Areas unless it can be demonstrated that it would be acceptable to otherwise develop the site.

5.4 In the adopted LDP, the Proposals Map (see **Figures 6** below) indicates that the site:

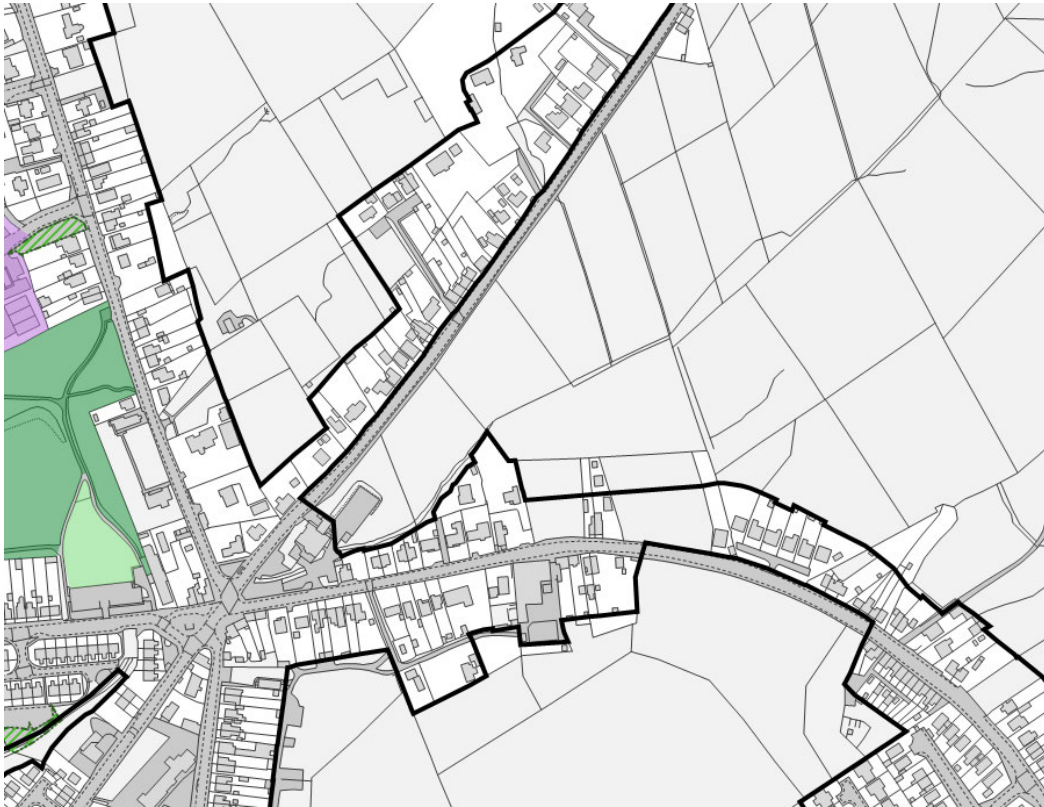
- Is located outside, but adjacent to, the settlement boundary of Gorslas;
- Is within an area with a Higher Proportion of Welsh Speakers;
- Is partly within a Sand and Gravel Minerals Safeguarding Area;
- Is within a Primary Resource Zone for Minerals;
- Is within a 10% Affordable Housing Viability Target area;
- Is within the Caeau Mynydd Mawr SPG Area;
- Is not the subject of any landscape or historic environment designations.

**Figure 6 – LDP Proposals Map Extract**



- 5.5 In the Deposit Revised LDP Proposals Map (see **Figures 7** overleaf) the site is located outside of, albeit adjacent to, the defined settlement boundary.

**Figure 7 – Deposit LDP Draft Proposals Map Extract**



## 6.0 APPRAISAL

### Principle of development

6.1 In terms of the site's current planning context, it is located outside the development boundary of Gorslas in an area considered as countryside. Notwithstanding this, the site is considered to be a sustainable and appropriate location for residential development and has therefore been advanced through the Council's call for candidate sites and continues to be promoted by the landowner.

6.2 The site's performance against the criteria of Policy SP1 Sustainable Place and Spaces is set out below:

*Distributing development to sustainable locations in accordance with the settlement framework, supporting the roles and functions of the identified settlements*

6.3 Gorslas is identified as a Growth Area within the LDP's Settlement Hierarchy (as set out in Appendix 1). The Candidate Site lies immediately adjacent to the existing settlement boundary.

6.4 Gorslas has a range of facilities and services (including shops, places of worship, public house etc), and there are proposals (as proposed by Planning Application W/36812) for a new Welsh-medium school to be located within the village. The settlement moreover has a close functional relationship with Cross Hands, which includes a further range of facilities and employment opportunities. The Strategic Spatial Options and Settlement Hierarchy Topic Paper to the LDP (Revised June 2013) identified that Gorslas formed part of the Ammanford/Cross Hands settlement grouping which scored the highest points score (of 49 points) when considering access to facilities and services.

6.5 The closest bus stops to the candidate site are located on Cross Hands Road and on Penygroes Road (some 200m and 350m away respectively). The site is linked to these services via a safe pedestrian route. These bus stops provide access to the No. 128, 129, 164 and 165 services – providing regular access to Carmarthen, Llanelli, Cross Hands, Tumble and Pontyberem.

*Promoting, where appropriate, the efficient use of land including previously developed sites*

6.6 The proposals would enable the development of an underused / vacant site. The proposal, for 31 homes, equates to a density of approximately 30 units per hectare – which accords



with the densities proposed for other sustainable communities within the LDP (as set out in Paragraph 6.2.13).

*Integrating with the local community, taking account of character and amenity as well as cultural and linguistic considerations*

- 6.7 The proposals integrate with the adjacent residential development at Gorslas by way of pedestrian and vehicular links. As outlined above, the site is well-located in terms of access to local and community facilities. The site layout demonstrates that residential amenity of neighbouring properties will be safeguarded, and cultural and linguistic interests will be safeguarded and promoted. New Welsh-medium schooling is proposed within Gorslas which will further contribute to the viability of language within the area.

*Respecting, reflecting and, wherever possible, enhancing local character and distinctiveness*

- 6.8 The Candidate Site lies immediately adjacent to the existing settlement boundary. It moreover lies adjacent to fields which are the subject of recent permissions for further residential development. There is accordingly development on three of its four sides. It is enclosed by trees and hedgerows. Any development at the site would accordingly be seen against the backdrop of existing residential development.

- 6.9 The proposals could be of a density and form that mimics the adjacent development, and there are opportunities for the architectural detailed design of the dwellings to enhance local character and distinctiveness.

- 6.10 The proposals retain the hedgerows and trees on the site boundaries. Strengthening and further planting of these boundaries will further reinforce the character of the area

*Creating safe, attractive and accessible environments which contribute to people's health and wellbeing and adhere to urban design best practice*

- 6.11 The site's location and the layout of the proposals means that the proposed development is safe, attractive and accessible contributing to the health and wellbeing of residents and adhering to urban design best practice.

*Promoting active transport infrastructure and safe and convenient sustainable access particularly through walking and cycling*

- 6.12 There are footways adjacent to all roads between the site and the services and facilities described earlier in this submission ensuring that these are accessible to pedestrians.
- 6.13 The site is within 1500m of National Cycle Route 47 (Celtic Trail) which is a mainly inland route starting at Newport and finishing at Fishguard passing through Neath and Carmarthen.
- 6.14 Accordingly it can be concluded that the site is accessible by the three most sustainable forms of transport – walking, cycling and public transport.

*Utilising sustainable construction methods where feasible*

- 6.15 The proposals can utilise sustainable construction methods where feasible.

*Improving social and economic wellbeing*

- 6.16 The development of the site will provide a range and choice of housing within a sustainable settlement. Residents of the development would contribute towards and support services within the local community.
- 6.17 The HBF's Housing Calculator estimates that building 31 homes would support the employment of 96 people, generate £373,992 in tax revenue (including £35,013 in council tax).
- 6.18 The proposals would accordingly support social and economic wellbeing.

*Protect and enhance the area's biodiversity value and where appropriate, seek to integrate nature conservation into new development*

- 6.19 The site has been the subject of an Extended Phase 1 Habitat Survey. Its findings indicate that the site is not subject to any unresolvable nature conservation constraint. Moreover, as previously outlined, the proposals include gifting an area of land to the Council for ecological enhancement and management in perpetuity and can facilitate further vegetative planting and strengthening of boundary hedgerows which would protect and enhance the area's biodiversity value.
- 6.20 Accordingly, having regard to the overall terms and provisions of Policy SP1, the site and proposals can be concluded to be sustainable and to accord with the policy.

### **Agricultural Land quality**

- 6.21 As set out in Section 2, the Welsh Government's Predictive ALC Map shows that the land is located within Urban and Grade 5 (very poor quality) agricultural land classification. Planning Policy Wales (PPW) Paragraph 4.10 outlines national policy towards conserving Wales' Best and Most Versatile (BMV) agricultural land. BMV agricultural land is defined in PPW as Grades 1, 2 and 3a. Accordingly, the Welsh Government's Predictive ALC Guidance note (November 2017) confirms that the land does not comprise BMV and no further survey work is required.

### **Minerals Safeguarding**

- 6.22 The site lies partly within a designated Minerals Safeguarding Area according to the LDP Proposal Map. Given the location of the site, which is in close proximity to residential development the Council are likely to consider the site suitable for mineral extraction. Mineral extraction would require heavy machinery, and create noise and dust, which are not compatible with existing residential development.

### **Flood Risk**

- 6.23 As set out in Section 2, the Development Advice Map published by NRW shows the site falls within Flood Zone A.
- 6.24 Flood Zone A means the site is considered to be at little or no risk of fluvial or tidal/coastal flooding. As set out in Figure 1 of TAN 15: Development and Flood Risk, Flood Zone A is used to indicate that the justification test is not applicable and there is no need to consider flood risk further in planning policy terms.
- 6.25 The development would not be at risk of flooding and would not increase flood risk elsewhere in accordance with TAN 15. Notwithstanding this, a Drainage Strategy would be prepared as part of any application proposal which would include detailed consideration of foul and surface water drainage and attenuation

### **Access Consideration**

- 6.26 The site is proposed to be accessed from Llandeilo Road. In access and highway terms the following is considered to be the case:

- The candidate site's location is closely related to Gorslas' existing settlement;
- The site is accessible to pedestrians, cyclists and public transport users;
- A safe and appropriate access, that meets current design standards, can be provided by utilising and widening the existing field access into the candidate site. This can incorporate pedestrian / cycle access;
- The development will generate a modest increase in traffic that is unlikely to have a significant detrimental impact on the operation of the surrounding highway network.

6.27 A Transport Statement would support any application in further considering the above. Notwithstanding this, at this stage it is considered that the candidate site is capable of meeting planning policy requirements in terms of being in an appropriate location that is safely accessible by all forms of transport and that the impacts of the development on the continued operation and safety of the surrounding highway network would be acceptable or can be suitably mitigated. It is accordingly considered that there are no transport related issues that should prevent the inclusion of this candidate site in Carmarthenshire County Council's Revised LDP.

### **Historic Environment**

6.28 As set out in Section 2, there are no designated heritage assets within the site and there do not appear to be any in close proximity that would be affected by the proposed development.

6.29 It is therefore considered that there would be no loss or threat to any heritage assets as a result of the proposed development.

### **Noise and Air Quality**

6.30 As set out in Section 2, the Welsh Government's Environmental Noise Mapping does not appear to be mapped as it is not a major road in Wales.

6.31 The area, having undertaken a site visit, is relatively quiet and it is considered that the level of existing noise is likely to be appropriate for occupiers of new residential development and that the proposed development by its very nature would not create an unacceptable impact in terms of noise.

6.32 The Map shows Air Quality for the site as falling between 0-10 NO<sub>2</sub>, which is the lowest possible range of NO<sub>2</sub> levels shown on the air quality data mapping. An Air Quality Assessment is not considered to be necessary in this case.

### **Ecology**

6.33 As identified in Section 2 the site is not located within any statutory designations for nature conservation. Notwithstanding this, the site is located within the Council's Caeau Mynydd Mawr SPG Area.

6.34 An Extended Phase 1 Habitat Survey has been undertaken by Habitat Matters Ltd (enclosed with submission). The Assessment confirms that the site lies within the Caeau Mynydd Mawr SPG area. It has been assessed as Marshy Grassland with a smaller proportion of Poor Semi-Improved Grassland. The field boundaries are potentially good foraging and commuting corridors for bats and include several trees with moderate to high roost potential feature. The site is crossed by the Gwendraeth Fawr and a ditch carrying water from outside the site.

6.35 The proposed development is intended to minimise the impact on local biodiversity. Proposed mitigation and enhancement measures include:

- maintaining a 7m buffer alongside the ditch and the Gwendraeth Fawr and also alongside all field boundaries;
- inclusion of an open grassland area;
- gifting Field 5 to Carmarthenshire County Council (CCC) in perpetuity as an area of land for ecological management to support the Caeau Mynydd Mawr SAC;
- closure of crossing (for livestock and vehicles) through Gwendraeth Fawr watercourse;
- provision of funding under a 106 agreement towards the SPG for the Caeau Mynydd Mawr SAC. This will enable CCC to bring areas of more suitable land under management for the Marsh Fritillary; and
- a careful lighting plan to ensure there is no light spill onto the field boundaries and adjacent habitat.

6.36 Accordingly, there are not considered to be any unresolvable ecological constraints that would prevent residential development at this site. The proposal moreover offers the opportunity for ecological enhancement – providing an area to allow ongoing management to support Marsh Fritillary habitat in perpetuity. Such benefits should be considered in

the wider assessment of the site when considering its potential inclusion as a candidate site within the LDP.

### **Landscape**

- 6.37 The site is not located within a designated landscape area. The site is situated adjacent to the settlement boundary of Gorslas and comprises an appropriate 'rounding off' of the settlement.
- 6.38 The LANDMAP visual and sensory evaluation of the area is classified as 'moderate'. The site itself comprises vacant land. The LANDMAP visual and sensory evaluation of the area states that poorly maintained land has contributed to the 'poor' condition of the area. Any development at the site would be seen against the backdrop of existing residential development. The site's topography, definitive boundaries, with residential development on its sides would ensure that the development would not represent an unacceptable encroachment into the countryside nor damage the character of the surrounding area.
- 6.39 Accordingly, the proposal would not impact on any valued landscapes and the change to the landscape is expected to be minimal.

### **Drainage and Utilities**

- 6.40 A Drainage Strategy would be prepared as part of any application at the site to confirm that both surface water run-off and foul water can be accommodated.
- 6.41 There are not anticipated to be any issues with connecting to the required utilities and services.

### **Deliverability**

- 6.42 Planning Policy Wales (Paragraph 9.2.3) defines deliverable sites as those that are *"free, or can be readily freed from planning, physical and ownership constraints, and is economically feasible for development, so as to create a sustainable community where people want to live"*.
- 6.43 The site is sustainably located and there are no pre-requisite infrastructural requirements to enable the site to be developed. The technical constraints identified to date have been assessed and accounted for in scheme design.

6.44 It is envisaged that the site, if allocated, would be the subject of a planning application in late 2021, and begin to deliver homes from 2022. It is estimated that delivery would occur at this site at a rate of at least 15 homes per annum. Development would accordingly be phased across the Plan period making the rate of change within the settlement gradual allowing new residents to assimilate into the community. The entirety of the scheme would be delivered within the Revised LDP Plan period, and it has accordingly been demonstrated that the site is deliverable.

## **7.0 SUMMARY AND CONCLUSION**

- 7.1 The proposed candidate site at land east of Llandeilo Road is considered to be sustainable, deliverable and appropriate for residential development.
- 7.2 In terms of current planning policy context, the site is located outside, but adjacent to, the settlement boundary of Gorslas. However, its sustainable location along with its character, appearance and relationship to the settlement boundary render it acceptable for residential development.
- 7.3 The site is not within or near any statutory cultural heritage, landscape or ecological designations. There are no technical constraints on the site that cannot be overcome or would preclude residential development.
- 7.4 The design and construction of any new residential development in this location would take into account the characteristics of the environment and preserve them in a manner that maintains or enhances their contribution to the environment, including their wider context. The gifting of land to the Council as a marsh fritillary habitat for ongoing management represents an enhancement to biodiversity within the wider area.
- 7.5 Our client is keen to work with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the Revised Local Development Plan.



