

2ND DEPOSIT REVISED
CARMARTHENSHIRE LDP
2018 – 2033

SITE ALLOCATION – PRC3/H6

HISTORIC SUPPORTING SUBMISSIONS
AND PLANNING HISTORY

- CARMARTHENSHIRE LDP (2006 – 2021) - INITIAL CONSULTATION – 2011
- MAES IFAN PHASE I – OUTLINE PLANNING APPROVAL – QUARTER 3 2012
- CARMARTHENSHIRE LDP (2006 – 2021) – ADOPTION - QUARTER 4 2014
- MAES IFAN PHASE I - RESERVED MATTERS APPROVAL – QUARTER 1 2015
- MAES IFAN PHASE I - OFFSITE INFRASTRUCTURE APPROVAL – Q1 2015
- CARMARTHENSHIRE LDP (2018 – 2033) – CANDIDATE SITE SUPPORTING STATEMENT – QUARTER 2 2018
- CARMARTHENSHIRE LDP (2018 – 2033) – SITE ALLOCATION SUPPORTING STATEMENT – QUARTER 1 2020
- CARMARTHENSHIRE LDP (2018 – 2033) – VIABILITY INFORMATION – QUARTER 4 2020

APRIL 2023

Re: PrC3/h6 - Carmarthenshire Revised Local Development Plan (LDP) 2018 – 2033 – Viability Infor...

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Re: PrC3/h6 - Carmarthenshire Revised Local Development Plan (LDP) 2018 – 2033 – Viability Informatio...

Tristan Mabbitt
To Rhys T Evans
Cc Alan Roberts; Clive Smith

PrC3-h6.docx
.docx File

Afternoon Rhys,

Further to your most recent correspondence, which unfortunately found its way into the spam folder initially.

I've now had the opportunity to speak with my clients in respect of the allocation, where they have asked me to confirm to yourselves that they agree to the assumptions as set out in your letter and as reproduced below:

- That the site is 'greenfield' (rather than 'brownfield') in nature.
- That housing will be built to reflect the need in the emerging Local Housing Market Assessment in terms of dwelling types / sizes.
- 50% of any affordable dwellings provided on-site (on mixed market and affordable housing sites) will be for social rent, and 50% intermediate tenure.
- That the value of open market properties is between £2,050 psm (£190 psf) and £2,300 psm (£213 psf) according to the size and location of the site, and the number of dwellings suggested in the Deposit Revised LDP under Policy HOM1.
- That S.106 contributions for sites comprising 5 or more dwellings for elements other than affordable housing will be between £2,000 per dwellings and £6,500 per dwelling depending on site size.

In addition they are also confident of their ability to meet the anticipated completion dates as set out in Appendix 7 of the Deposit Revised LDP.

I trust the above is acceptable in confirming the requirements to support the delivery of the allocation, where should you require any further information please do not hesitate in coming back to us.*

Kindest regards

Trystan

* I'd be grateful if you could add the owners of the site (cc'd) to the database for any future correspondence given the issues with receipt previously please.

Gofynnwr am / Please ask for:

Rhys Evans

Llinell Uniongyrchol / Direct Line: 01267 228818

E-bost Uniongyrchol / Direct Email:

[REDACTED]

Eich cyf / Your ref:

Dyddiad / Date:

13/10/2020

Fy nghyf / My ref: PrC3/h6

FAO – Mr Trystan Mabbit

Dear Sir

RE: Carmarthenshire Revised Local Development Plan (LDP) 2018 – 2033 – Viability Information for Housing Site Allocations and Statements of Common Ground

Allocated Site Name: Land Adjoining Maes Ifan, Maesquarre Road

Allocated Site Reference: PrC3/h6

You may be aware that your candidate site has been included in the Deposit Revised LDP. The name of the housing allocation that identifies your site is set out above, as is its site reference number.

Carmarthenshire County Council must be able to demonstrate the deliverability of all allocated housing sites in its development plan and ensuring a strong evidence base is a critical element of this.

As part of the work undertaken to inform the Deposit Plan, the Local Authority commissioned Burrows Hutchinson Ltd to undertake high-level viability appraisals to support the delivery of these sites.

This has also informed the identification of Affordable Housing targets within Policy AHOM1: Provision of Affordable Homes. Currently your site falls within the 10% to 15% affordable housing provision in the Deposit Plan.

The assumptions used to generate this target are set out within the Preliminary Report on Financial Viability (2019) published on our website here:

<https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base/#.Xk0P5-RXWmQ>

under the Background Evidence downloads on this page.

Llinos Quelch

Pennaeth Cynllunio,
Adran Yr Amgylchedd, 7/8 Heol Spilman,
Caerfyrddin, Sir Gaerfyrddin SA31 1JY
Head of Planning,
Environment Department, 7/8 Spilman Street,
Carmarthen, Carmarthenshire SA31 1JY

*Mae Cyngor Sir Caerfyrddin yn croesawu
gohebiaeth yn Gymraeg neu yn Saesneg
Carmarthenshire County Council welcomes
correspondence in Welsh or English*



BUDDSODDWYR | INVESTORS
MEWN POBL | IN PEOPLE

These assumptions include:

- That the site is 'greenfield' (rather than 'brownfield') in nature.
- That housing will be built to reflect the need in the emerging Local Housing Market Assessment in terms of dwelling types / sizes
- 50% of any affordable dwellings provided on-site (on mixed market and affordable housing sites) will be for social rent, and 50% intermediate tenure.
- That the value of open market properties is between £2,050 psm (£190 psf) and £2,300 psm (£213 psf) according to the size and location of the site, and the number of dwellings suggested in the Deposit Revised LDP under Policy HOM1.
- That S.106 contributions for sites comprising 5 or more dwellings for elements other than affordable housing will be between £2,000 per dwellings and £6,500 per dwelling depending on site size.

We would now like to hear from you whether or not the assumptions set out above are representative of your site. If you are satisfied and consider that you can deliver your site in accordance with the provisions of the Deposit Revised LDP and the assumptions made in the supporting evidence then please respond to us to confirm.

We would like to note that the allocation of this site in the deposit Revised LDP did not draw a substantive objection from statutory consultees. However, if you consider that there are likely to be significant 'abnormal' works / costs or any infrastructural constraints or issues which are likely to affect the development of your site, and affect the site's ability to comply with the Deposit plan's policies in full, we would welcome an early 'open book' discussion with you on this.

The assumptions we are making for anticipated completions on your site can be found in Appendix 7 of the Deposit Revised LDP. If you consider it unlikely that you will develop the site in accordance with the timescales set out in the Deposit plan's Housing Trajectory, please notify us of this as soon as possible.

Please contact us by no later than **13th November 2020 at 4:30pm** to confirm whether or not you are satisfied with the information as set out in this email and to address the matters outlined above

Yours faithfully,



Ian R Llewelyn

**Rheolwr Blaen-gynllunio /
Forward Planning Manager**

CARMARTHENSHIRE REVISED LDP
2018 - 2033

SITE ALLOCATION – PRC3/H6
SUPPORTING STATEMENT:

LAND ADJOINING, MAES IFAN,
MAESQUARRE ROAD, BETWS,
AMMANFORD

MR. C SMITH & MR. A ROBERTS

MARCH 2020

SITE ALLOCATION - PRC3/H6– SUPPORTING STATEMENT

BACKGROUND

Further to the call for candidate sites as part of the previous round of consultation in 2018 and this the latest round of consultation seeking to outline the preferred strategy as part of the deposit version of the Carmarthenshire Revised Local Development Plan (LDP).

The following update is provided to help support the specific allocation at Maes Ifan (PrC3/h6) in order to identify the sites adherence to the strategic aims of the plan, aswell as provide further supporting information to identify how the plan through its specific allocation is considered to be sound when set against the requirements of National Policy.

The following statement should therefore be read in conjunction with the Deposit Revised Local Development Plan (LDP) Representation Form; previous candidate site assessment questionnaires aswell as the previous candidate site supporting statements. The details of which are included as part of the overall submission package for ease.

As part of the initial examination into the adoption of the current LDP, the details of which now form the basis for all decision making throughout Carmarthenshire, the site the subject of this representation was submitted together with that of an additional and adjoining parcel of land in my client's ownership which fronts Maesquarre Road.

Unfortunately, and is evident of the requirement to submit this proposal, the development limits weren't extended as part of the adoption of the current plan. However, since that time the adjacent site has been promoted through the planning system from what was an extant outline permission through to a reserved matters application and the development and completion of nine executive homes, which has become a much sought after and exemplar development in the community.

It is therefore as a consequence of the above that the allocation of the site is now considered to be even more appropriate given the supporting infrastructure in place, to help demonstrate the feasibility and deliverable of the site within the plan period.

DESCRIPTION OF THE SITE

The site the subject of this representation is an area consisting of some 1.6 hectares of agricultural land within the village of Betws, near Ammanford. Specifically, the site represents a slightly sloping area of land from north east to south west which is encompassed to the north and east of the site by wooded embankments and dense hedgerows which provides strong physical enclosures. To the southern and western boundaries of the site there exists stock fencing and hedgerows with intermittent trees, which will be retained in any future development. An overview of the site can be seen in appendix 1 and 2.

The site consists of primarily improved agricultural grassland which is grazed by sheep and horses. The site itself has a low level of variation in species assemblage given the agricultural improvements of the past, where there are no known areas of particular importance to nature conservation which is supported by the ecological surveys previously commissioned.

In relation to surrounding residential form the site is primarily enclosed by residential blocks with the Charles Church site to the North and that of the properties which back onto the site from Heol Waun Dwfn to the South, together with the

SITE ALLOCATION - PRC3/H6– SUPPORTING STATEMENT

properties along Maesquarre Road and the most recent development of the Maes Ifan scheme to the West, which form defensible boundaries to the site.

ADHERANCE TO THE LDP STRATEGY AND POLICIES

In order to continue to obtain support for the sites allocation, in terms of its overall adherence to the strategies and policies put forth by the Council as part of the revised LDP, the following policy analysis has been undertaken to reinforce the allocations adherence to the main aims of the plan.

Strategic Policy SP3 - 'Sustainable Approach to Providing New Homes'

The identification of Ammanford and its surrounding villages as sustainable growth areas as part of the Tier 1 – Principle Centre classification is supported, where the ability of the allocation to help contribute to that of the overall aims of the plan in providing 8,835 new homes together with the delivery of 1,500 new affordable homes is welcomed.

Policy HOM1 – 'Housing Allocations'

Seeks to satisfy the housing land requirements for the County through the distribution and identification of sustainable centres for which the promoted site is considered to be one of.

The site is located in an area where larger developments have historically been developed to provide much needed housing for supporting the expanding and thriving community, where given recent investment into schools and services the site would only seek to enhance the vibrancy and community of the area.

The site is currently located directly adjacent to the existing settlement limits on three of its extremes, where subject to its continued inclusion in the revised LDP the site will provide a consolidation and rounding off of this part of the settlement and is not considered to be of detriment to the character and appearance of the settlement nor its environment. Rather it is considered that the allocation would provide a cumulative contribution towards the soundness of the plan in seeking to meet the Revised LDP housing objectives.

Strategic Policy SP4 – 'Affordable Homes Strategy' & Policy AHOM1 – 'Provision of affordable homes'

The policies surrounding Affordable Housing are understood and supported as being one of the key drivers in the success of the LPD given the current shortfall of accommodation for younger people and families. In seeking to provide this much needed resource it is recognised that balancing the demographics of the County through the retention of younger adults elsewhere, can in turn seek to address some of the issues which could be perceived from an aging population. The requirement across the site to provide circa 15% of the total number of dwellings to be affordable is therefore recognised as being able to have a positive impact.

In addition to this and whilst not strictly classed as affordable housing, it is recognised that the ability to provide a mix of house types throughout the development will help assist people of varying circumstances from those seeking affordable homes, first time buyers, young professionals, families to that of those looking for a more executive style property. In turn it is recognised that such developments can help create a greater sense of place and help maintain a sustainable community.

SITE ALLOCATION - PRC3/H6– SUPPORTING STATEMENT

Strategic Policy SP11 – ‘Placemaking and Sustainable Places

The site enjoys close connections with Ammanford where there is a range of services in the immediate area, including supermarkets, newsagents and primary schools these services are further supplemented by chemists, butchers, banks, takeaways and public houses within the town itself, which is a short cycle and walk away. There are also regular bus services. The above factors consequently support the site in form of accessibility to services in a sustainable means as promoted by the LDP in conjunction with TAN12 (Design) and that of Strategic Policy 17 ‘Transport and accessibility’.

Policy PSD1 – Sustainable and High-Quality Design

The above policy together with the requirements as set out in TAN 12 (Design) is supported as any forthcoming proposals for the site would seek to be compatible in the context of the character and capacity of the area in paying regard to local distinctiveness, as well as seek to reduce energy demand through design and provision of renewable technologies.

Strategic Policy SP17 – ‘Transport and accessibility’ & Policy TRA5 – ‘Highways and access standards in development’

As part of the master planning for the whole area in my client’s ownership, there has always been a requirement to ensure that the latter phases of development and that of future land allocations could come forward without any impediment to highway safety or deliverability. As a consequence of this the necessary access and services are already in place to compliment the next stage of development, having been developed to the edge of the site.

SUSTAINABILITY APPRAISAL

Having considered the details provided as part of the LPA’s Sustainability Appraisal in relation to the site and whilst not disagreeing with the majority of the conclusions therein. There is reference that the site is one which “complies with some elements of the SA objective whilst hindering others.”

The following information therefore seeks to offer further clarity where comments have been raised and offers mitigation to help support the continued inclusion of the site. Specifically, the documentation which is reproduced in appendix 3 below highlights the following areas which would benefit from mitigation:

- AC7 – Pridd / SA7 – Soil
- AC9 – Tirwedd / SA9 Landscape

As part of the specific commentary when set against ‘AC7 – Soil’ it is stated that “This site does not utilise previously developed land, however it otherwise preforms well against the sustainability framework”. In response to this it must be noted that within the confines of the site there is evidence of certain former developments having taken place in conjunction with the adjacent housing development of Maes Ifan. Part of these works relate to the compound and storage areas that were apparent on the site to facilitate the development albeit a temporary arrangement. In addition, and more of a permanent feature on the site, is that of the construction of an attenuation basin and associated drainage works to discharge surface water from the adjacent site of Maes Ifan under planning application E/31546 which was approved and implemented in the summer of 2015, where the area is also anticipated to be utilised as part of any future requirement for the promoted site.

SITE ALLOCATION - PRC3/H6– SUPPORTING STATEMENT

In respect of 'AC9 – Landscape' whilst it is recognised that this element relates once again to the site not being of previously developed land in many instances, there is also the consideration of the site in relation to its wider context within the landscape and its interaction with that of the existing build form. In order to seek to address and mitigate this, it is anticipated that a fully developed landscape and environmental management plan can be developed to support any forthcoming planning application. Therefore, providing a comprehensive planting strategy for the site in particular the south west boundaries and that of the areas surrounding the existing attenuation pond, which in turn will create a greater form of habitat creation exceeding the current on-site situation in form of a positive overall net gain for the site.

VIABILITY

As can be evidenced from the information contained there are no significant obstacles or constraints to the delivery of the development given the site is within the complete ownership of my client and consequently there are no third parties owners, easements or other title impediments that could prevent the delivery of this site.

The site has no physical constraints or obstructions that would prevent its overall development and does not contain or adjoin any of the following:

- Protected trees or hedgerows;
- Watercourses or water bodies;
- Power lines or other utilities;
- Ecological features;
- Ground conditions or contamination; or
- Listed buildings or other protected structures.

In order to support this further the constraints plan produced by the Council and their independent consultants tasked with undertaking the study, identifies the land as being free of any potential showstoppers in terms of the viability/delivery of the site.

In terms of detailed figures in respect of the various expenditure and overall profitability of the adjacent site developed at Maes Ifan, this information can be made available on request, should the Inspector or Authority require further assurances beyond the visible delivery of what is a very similar site in terms of both its land status and the way that any development or build agreement could be structured.

SITE ALLOCATION - PRC3/H6– SUPPORTING STATEMENT

DELIVERABILITY

Having considered the various documentation published as part of the revised plan, clarity is sought as to the amended timescales now referred to in respect of the delivery of the site as set out in the Site Trajectory Schedule of the January 2020 Written Statement (Please see appendix 4)

As part of the candidate site process undertaken in 2018 the initial site allocation identified the site as being capable of delivery in the short term between 2021 – 2024. Whilst it is recognised that there has been changes to the consenting regime in respect of the introduction of the PAC process, Maes Ifan developments are confident that a similar delivery timeframe can be achieved.

The Revised LDP is scheduled for submission to the Welsh Government in August 2020 (Key Stage 5 of the LDP preparatory process), with the Examination (Key Stage 6) scheduled to commence in October 2020 before the final adoption in December 2021.

In order to provide an indication of the ability to deliver the scheme based on the above information, the following indicative timeline has been provided to assist in identifying an indicative completion date for the site:

Adoption:	December 2021
Pre-Application Consultation:	3 months = March 2022
Finalisation of application:	2 months = May 2022
Submission & determination of application:	6 months = November 2022
Discharge of conditions:	3 months = February 2023
Construction of Phase 1:	12 months = February 2024
Construction of Phase 2:	12 months = February 2024
<u>TOTAL TIMESCALE:</u>	<u>3 years and 2 months = February 2025</u>

On the basis of the above it is therefore suggested that the site has the potential to be delivered earlier in the plan period. As a consequence of this the site could provide a significant housing contribution within the initial stages of the plan bridging the gap for the shortfall of housing provisions that is currently evident, given the lack of a 5-year land supply across the County.

Whilst appreciating there maybe a certain degree of slippage against the June 2018 Delivery Agreement, clarity is required as to what is the true timescales for adoption are, given the various alternative timescales being presented as part of the documentation which has suggested that the delivery of the site in some instances could be between 6 and 15 years.

SITE ALLOCATION - PRC3/H6– SUPPORTING STATEMENT

CONCLUSIONS

The site the subject of this supporting representation is one that complies with the strategic aims of the LDP and is therefore considered to be a realistic and deliverable proposal, which is founded on a robust and credible evidence base in order to meet the test of soundness of the revised plan.

The allocation represents a logical extension and rounding off of the existing settlement limits of the LDP, where through its inclusion the site would only seek to enhance the area.

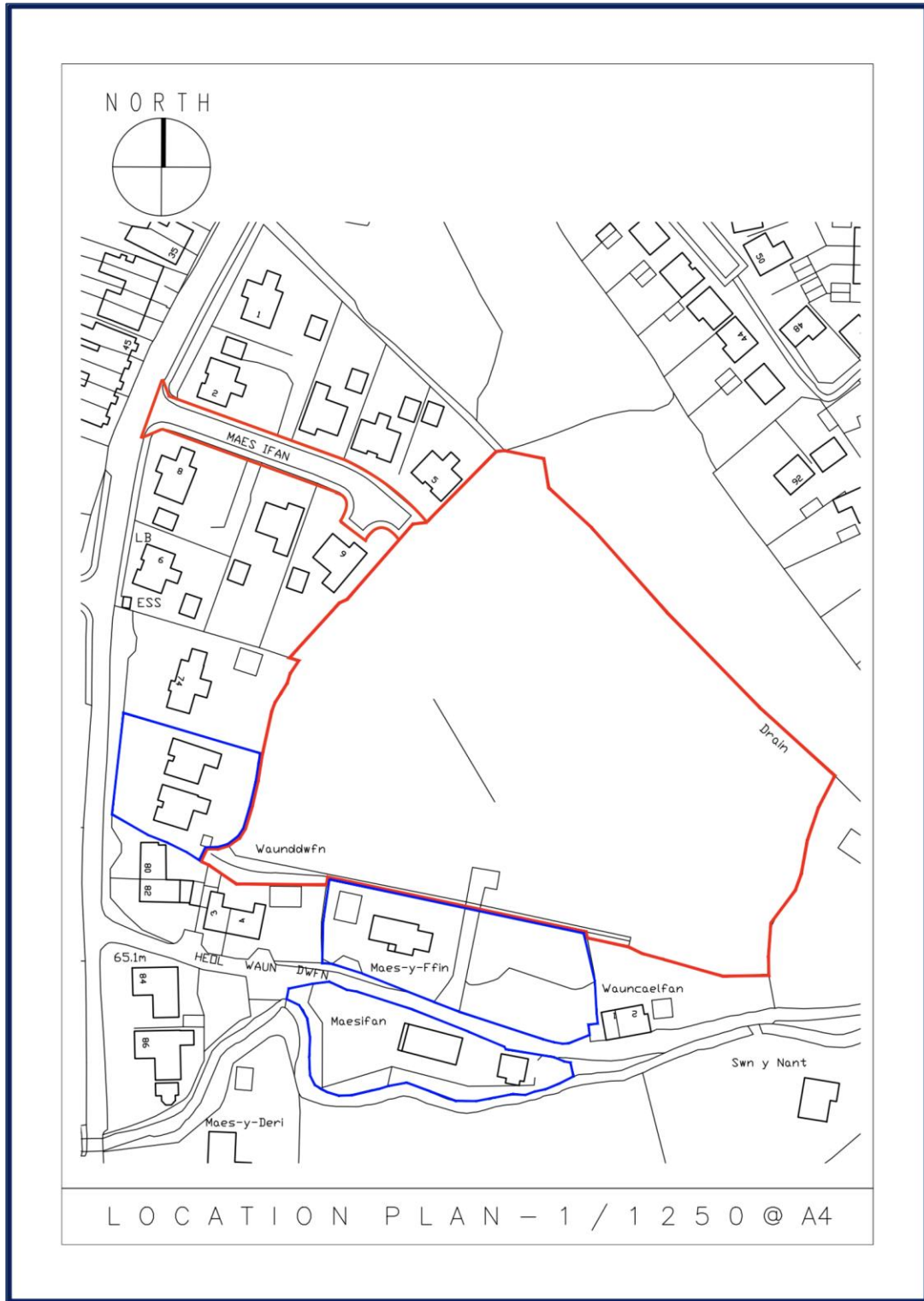
The principle of allocating the site at Maesquarre Road for housing is appropriate as the site complies with the search sequence and allocation process provided in Planning Policy Wales. In accordance with paragraphs 4.7.2 and 9.2.9 of PPW, the site is:

- Sustainably located within a growth area to maintain and improve the vitality, attractiveness and viability of the area.
- Within walking and cycling distance of key services, facilities and employment opportunities within Betws and Ammanford, thereby minimising the need to travel particularly by private car.
- Located such that it is already well served by existing and necessary infrastructure to support the proposed development.
- Located in a settlement and a location that will be resilient to climate change and any other impacts of climate change can be dealt with through design and other mitigation measures.
- Is not subject to any physical or environmental constraints on development including flood risk or ecology.

It is therefore on the basis of the above that the applicants respectfully request, that the appointed Inspector, Members and Officers of the Council continue to support the inclusion of the site, in order to help ensure that the continued housing needs of the County can be realised through the Revised LDP.

SITE ALLOCATION - PRC3/H6- SUPPORTING STATEMENT

APPENDIX 1 – SITE LOCATION PLAN



SITE ALLOCATION - PRC3/H6- SUPPORTING STATEMENT

APPENDIX 2 – INDICATIVE SITE LAYOUT



SITE ALLOCATION - PRC3/H6- SUPPORTING STATEMENT

APPENDIX 3 – SUSTAINABILITY APPRAISAL SUMMARY

Cynllun Datblygu Lleol Diwygiedig Sir Gar / Carmarthenshire Revised Local Development Plan Crynodeb Gwerthuso Cynaliadwyedd / Sustainability Appraisal Summary

Manylion y Safle / Site Details

Rhif y Safle Ymgeisio / Candidate Site Number:	SR/004/015 CA0420	Cyfeirnod y Safle / Site Reference:	PrC3/h6
Cyfeiriad y Safle / Site Address:	Tir ger Maes Ifan Land adjoining Maes Ifan	Arwynebedd y Safle / Site Area:	1.563ha
Defnydd Presennol / Existing Use:	Amaethyddiaeth / Agriculture	Defnydd Arfaethedig / Proposed Use:	Preswyl / Residential

	AC / SA
AC1 - Datblygu Cynaliadwy / SA1 - Sustainable Development	+
AC2 - Bioamrywiaeth / SA2 - Biodiversity	+
AC3 - Ansawdd Aer / SA3 - Air Quality	+
AC4 - Ffactorau hinsoddol / SA4 - Climatic Factors	+
AC5 - Dŵr / SA5 - Water	+
AC6 - Asedau Materol / SA6 - Material Assets	+
AC - Pridd / SA7 - Soil	+/-
AC8 - Treftadaeth Ddiwyllianol ac Amgylchedd Hanesyddol	+
AC9 - Tirwedd / SA9 - Landscape	+/-
AC10 - Poblogaeth / SA10 - Population	+
AC11 - Y Gymraeg / SA11 - The Welsh Language	+
AC12 - Iechyd a Llesiant / SA12 - Health and Well-being	+
AC13 - Addysg a Sgiliau / SA13 - Education and Skills	+
AC14 - Yr Economi / SA14 - Economy	+
AC15 Gwead Cymdeithas / SA15 Social Fabric	+

Sustainability Criteria

- + Mae'r safle arfaethedig yn cydymffurfio ag amcan yr Arfarniad Cynaliadwyedd / Proposed site complies with SA objective
- +/- Mae'r safle arfaethedig yn cydymffurfio â rhai elfennau o amcan yr Arfarniad Cynaliadwyedd er ei fod yn rhwystro eraill. Ystyried mesurau lliniaru ar gyfer effeithiau negyddol / Proposed site complies with some elements of the SA objective whilst hindering other. Consider mitigation for negative effects.
- Mae'r safle arfaethedig yn gwrthdaro ag amcan yr Arfarniad Cynaliadwyedd. Mae'n bosibl nad yw'r safle'n addas i'w ddatblygu. Ystyried mesurau lliniaru sylweddol / Proposed site is in conflict with SA objective. Site may be inappropriate for development. Consider significant mitigation.

Sylwbaeth Gwerthuso Cynaliadwyedd / Sustainability Appraisal Commentary

Nid yw'r safle hwn yn defnyddio tir a ddatblygwyd o'r blaen, ond fel arall mae'n perfformio'n dda yn erbyn y fframwaith cynaliadwyedd.

This site does not utilise previously developed land, however it otherwise performs well against the sustainability framework.

**REVISED CARMARTHENSHIRE LOCAL
DEVELOPMENT PLAN 2018 - 2033**

**CANDIDATE SITE SUPPORTING
STATEMENT:**

**LAND ADJOINING, MAES IFAN,
MAESQUARRE ROAD, BETWS,
AMMANFORD**

MR. C SMITH & MR. A ROBERTS

AUGUST 2018

BACKGROUND

In response to the call for candidate sites under the revised Carmarthenshire Local Development Plan (2018 – 2033) the following detailed appraisal together with its supporting statements have been commissioned in order to demonstrate that the allocation sought is both feasible and deliverable within the plan period.

The following information should be read in conjunction with the candidate site assessment questionnaire which also forms part of this submission as well as the relevant planning history and historic representations, the details of which have been summarised below for ease.

Overall the details contained have been prepared in accordance with Carmarthenshire County Council's published documents entitled Revised Carmarthenshire Local Development Plan: Guidance Note and Revised Carmarthenshire Local Development Plan: Candidate Site Assessment Methodology.

SECTION 1 - INTRODUCTION

In order to set out a clear and concise argument in support of the allocation the contents of this statement seek to address the requirements contained within the published guidance documents.

In addition to this there is also the assurance that it complies with regards to the guidance and requirements of Planning Policy Wales (Edition 9) when it comes to the preparation of development plans and the allocation of land for residential purposes as part of them.

The statement is therefore structured as follows:

Section 1	Introduction
Section 2	Description of the site
Section 3	Site History
Section 4	Relationship to the town
Section 5	Site context
Section 6	Viability
Section 7	Planning policy
Section 8	Conclusions
Appendices	Site location Plan, Existing Site Plan, Proposed Site Plan, Flood risk map, Utilities plans, Ecological Survey, Site investigation report,

SECTION 2 – DESCRIPTION OF THE SITE

The site the subject of this representation is an area of land consisting of some 1.6 hectares of agricultural land within the village of Betws, near Ammanford.

Specifically, the site represents a slightly sloping area of land from north east to south west which is encompassed to the north and east of the site by wooded embankments and dense hedgerows which provides strong physical enclosures. To the southern and western boundaries of the site there exists stock fencing and hedgerows with intermittent trees, which again will be retained in any future development. The details of which can be seen in the following figures 1 and 2.

The site consists entirely of improved agricultural grassland which is grazed by sheep and horses. The site itself has a low level of variation in species assemblage given the agricultural improvements of the past, where there are no known areas of particular importance to nature conservation. As can be evidenced from the ecological surveys in appendix 9.

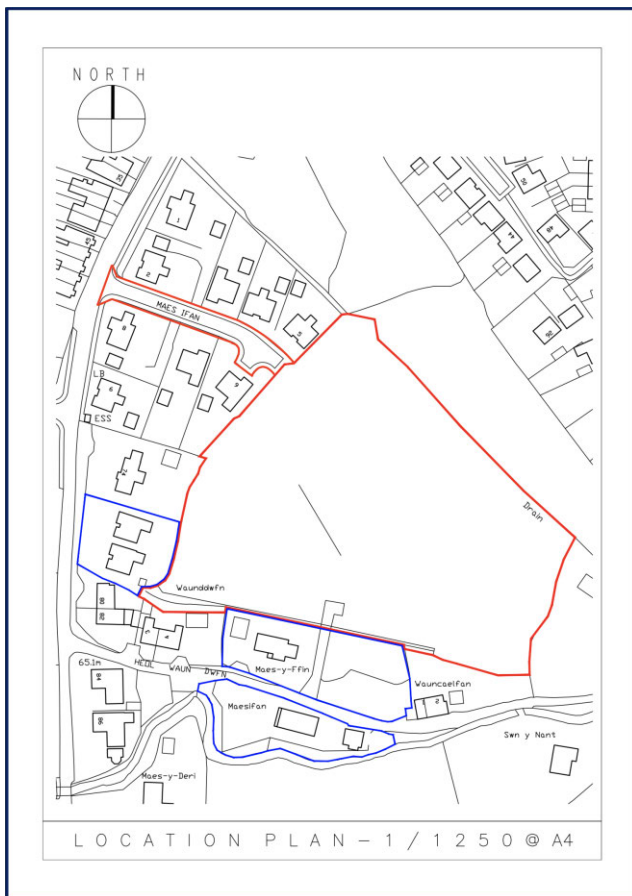


Figure 1 – Location Plan



Figure 2 – Aerial Plan

In relation to surrounding residential form the site is primarily enclosed by residential blocks with the Charles Church site to the North and that of the street frontage properties which back onto the site from Heol Waun Dwfn to the South and Maesquarre Road and the newly completed estate of Maes Ifan which was completed under an extant planning permission following the adoption of the current LDP to the West which form defensible boundaries to the site.

SECTION 3 - SITE HISTORY

As part of the initial examination into the adoption of the current Local Development Plan (LDP), the details of which currently form the basis for all decision making throughout Carmarthenshire, the site the subject of this representation was submitted together with that of the adjacent agricultural parcel of land in my client's ownership for residential development.

Unfortunately, and is evident of the requirement to submit this proposal, the development limits weren't extended as part of the adoption of the current plan. However, both during and since that time as is evident from the submission the site was promoted through the planning system from that of an initial outline approval, the discharge of reserve matters applications before finalising what has become an exemplar development in the community. The detailed planning history of which is provided below together with a layout of the completed development:

- E/26857** **Outline Planning Application – 9 residential dwellings, highways access and associated works**
Approved – 7th December 2012
- E/31337** **Reserved Matters Application – Residential development of 9 dwellings**
Approved - 19th March 2015
- E/31546** **Full Planning - Construction of an attenuation basin and associated drainage works to discharge surface water from the 9 properties under planning application E/31337**
Approved - 27th March 2015

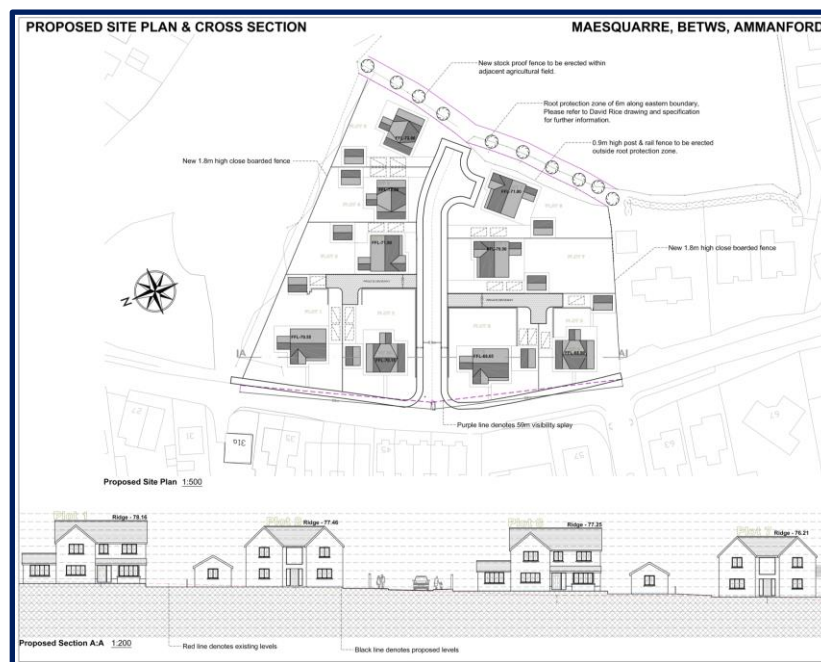


Figure 3 – Initial phase of development at Maes Ifan

As a consequence of the above and the desire of my clients to provide additional housing in the community, the process of resubmitting the proposed site which can be evidenced as both availability and deliverable was a must.

SECTION 4 – RELATIONSHIP TO THE TOWN

In order to evidence how the proposed site is sustainably located in respect of the area and its relationship to the wider surrounding areas figure 4 below highlights the location of the site (red star) in relation to the settlement of Betws and the area immediately surrounding it including the nearby town of Ammanford.

The local area contains a number of schools (green stars) ranging from nursery through primary, junior and secondary schools. There are also a number of churches (blue stars) as well as medical facilities including chemists, GP surgeries and a dentist (yellow stars).

The area also offers numerous banks and building societies together with a post office in the main town of Ammanford (orange stars). In addition to this there are a number of retail stores as well as large supermarkets to serve the site (pink stars).

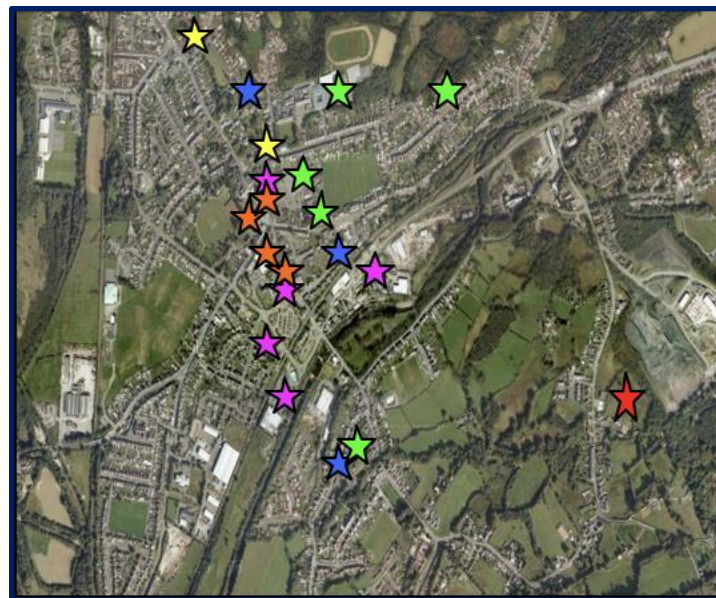


Figure 4 – Local Facilities

As can be seen there are a number of key services and facilities clustered within the town centre of Ammanford and within very close proximity to the site (less than a 10 to 15 minute walk) which lies on the opposite side of the main road linking Bynamman to the east and the M4 to the west. The site is therefore located in a sustainable location where it is well served by the local facilities on offer.

There are also several bus routes that run through the town as well as along Maesquarre road adjacent to the site which connect to the surrounding settlements and also to the larger towns of Llanelli and Carmarthen. The services offered are frequent which encourages their use and offers a viable alternative to private transport which increases the sustainability of the site, the details of which are set out in the following figure examples:

CANDIDATE SITE SUPPORTING STATEMENT – LAND ADJOINING MAIS IFAN, BETWS

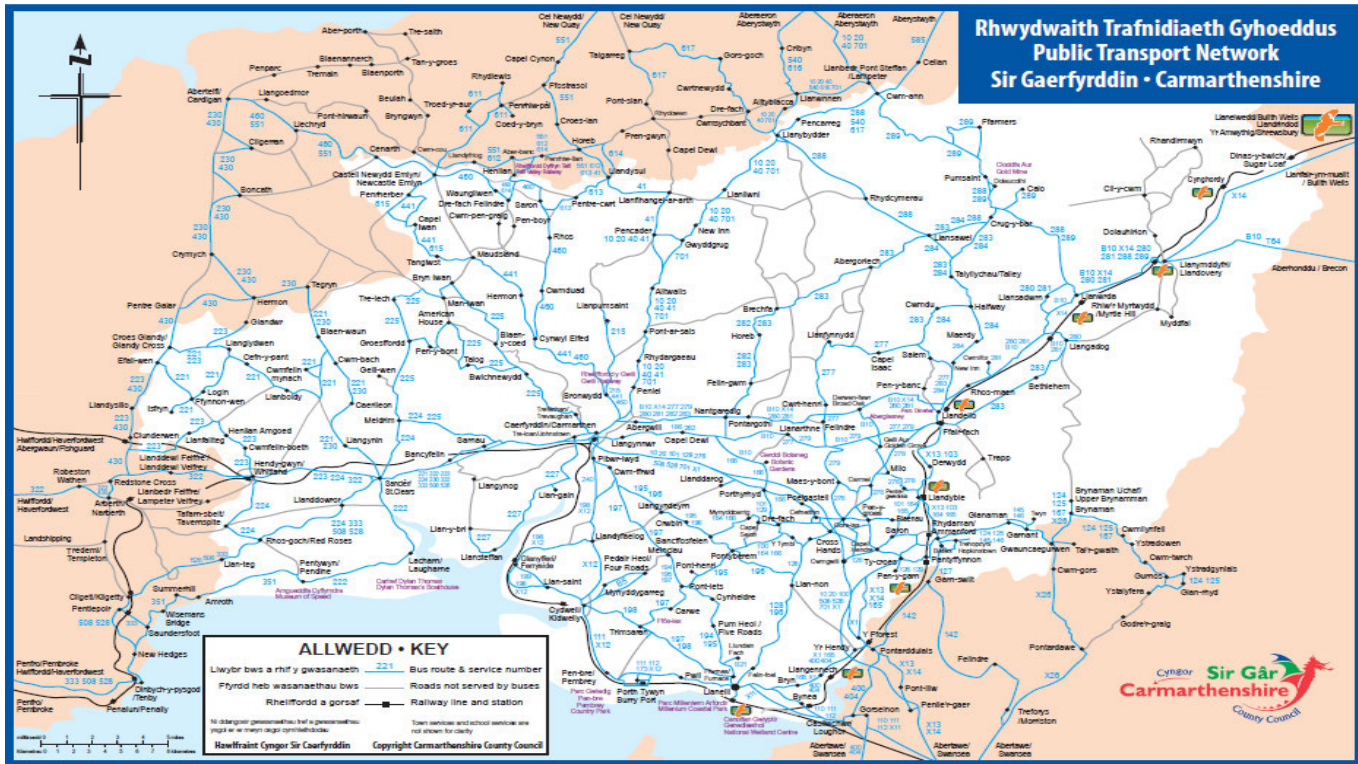


Figure 5 – Public Transport Network

Gwybodaeth Trafnidiaeth Gyhoeddus Public Transport Information									
Llanelli - Rhydaman/Ammanford					Gwasanaeth/Service 128				
dwywaith Ddielach - Cross Hands - Capel Hendre					Yn weithredol i'w bodio o'r 15/11/2011				
Dydd Llun i ddydd Sadwrn (oni nodir fel arall) - Monday to Saturday (unless shown otherwise)									
First Cymru									
am/pm	am	am	pm	pm	am	pm	Su	Su	Su
Codau Diwrnodau/Day Codes									
Parc Pemberton, gylfeithypp Morraens					11:00	3:00	8:00		
Parc Troate, loches/sheiler					11:03	3:03	8:03		
Llanelli, Gorsaf Ffysiau Bus Station	7:10	9:30	11:50	2:10	4:00	5:40			
Foln Iod, gylfeithypp Drwydy	7:13	9:33	11:53	2:13	4:43	5:43	11:13	3:13	6:13
Ysbty Tŷwysog Philip/Prince Philip Hospital	7:24	9:44	12:04	2:24	4:54	5:54	11:18	3:18	6:18
Llanon, sgwâr/square					11:27	3:27	6:27		
Y Tymbl Uchel/Upper Tumble, Troed y Bryn	7:28	9:48	12:08	2:28	4:58	5:58	11:30	3:30	6:30
Y Tymbl/Tumble, Tynon	7:30	9:50	12:10	2:30	5:00	6:00	11:32	3:32	6:32
Dreilfach, Sgwâr/Square cyntar	7:33	9:54	12:14	2:34	5:04	6:04K	11:36	3:36	6:36
Dreilfach, Sgwâr/Square gaddeop	7:34	9:55	12:15	2:35	5:05K	6:05K	11:37	3:37	6:37
Colofelin, Nawsydd Ial	7:39	10:00	12:20	2:40	5:10	6:10	11:42	3:42	6:42
Cross Hands, gylfeithypp Llyfrgell/Library	7:39/10:04	12:24	2:41	5:14/6:14			11:46	3:46	6:46
Parc Busnes Cross Hands Business Park					11:49	3:49	6:49		
Gonlas, gylfeithypp Ysgol/School					11:52	3:52	6:52		
Pon y groes, Meddygia/Surgery					11:55	3:55	6:55		
Capel Hendre, gylfeithypp Post/Post Office					11:59	3:59	6:59		
Saron, Swyddfa Post Office					12:04	4:01	7:01		
Try-dal, gylfeithypp Coleg/College					12:04	4:04	7:04		
Rhydaman/Ammanford, Gorsaf Ffysiau Bus Stn					12:08	4:08	7:08		
Codau Diwrnodau/Day Codes									
am/pm	am	am	pm	pm	F-S	Su	Su	Su	
Rhydaman/Ammanford, Gorsaf Ffysiau Bus Stn		10:40	1:00	3:20	5:35	10:30	9:50	12:50	4:50
Try-dal, Coleg/College		10:42	1:02	3:22	5:37	10:32	9:52	12:52	4:52
Saron, gylfeithypp Post/Post Office		10:49	1:09	3:29	5:43	10:37	9:58	12:58	4:58
Capel Hendre, Swyddfa Post Office		10:53	1:13	3:33	5:46	10:40	10:00	13:00	5:00
Pon y groes, gylfeithypp Meddygia/Surgery		10:56	1:16	3:36	5:49	10:43	10:03	13:03	5:03
Gonlas, Ysgol/School		11:01	1:21	3:40	5:54	10:48	10:07	13:07	5:07
Parc Busnes Cross Hands Business Park		11:04	1:24	3:43	5:57	10:51	10:10	13:10	5:10
Cross Hands, Llyfrgell/Library	7:45	8:50	11:07	1:27	3:46	6:01	10:13	13:13	5:13
Colofelin, Y Sgwy	7:49	8:54	11:11	1:31	3:50	6:05	10:17	13:17	5:17
Dreilfach, Sgwâr/Square cyntar	7:54	8:59	11:16	1:35	3:54	6:09	10:22	13:22	5:22
Dreilfach, Sgwâr/Square gaddeop	7:55K	9:00	11:17	1:37	3:56	6:10	10:22	13:22	5:22
Y Tymbl Uchel, Cwb Ryglu/Rugby Club	8:00	9:05	11:22	1:42	4:01	6:15	10:27	13:27	5:27
Y Tymbl Uchel/Upper Tumble, Troed y Bryn	8:01	9:06	11:23	1:43	4:02	6:16	10:28	13:28	5:28
Llanon, sgwâr/square	8:05	9:11	11:28	1:48	4:07	6:21	10:32	13:32	5:32
Ysbty Tŷwysog Philip/Prince Philip Hospital					10:41	4:41	5:41		
Foln Iod, Drwydy/Droedy	8:16	9:21	11:38	1:58	4:17	6:31	10:43	13:43	5:43
Llanelli, Gorsaf Ffysiau Bus Station	8:20	9:25	11:42	2:02	4:21	6:35	10:50	13:50	5:50
Parc Troate, loches/sheiler					10:55	4:55	5:55		
Parc Pemberton, Morraens					10:58	4:58	5:58		

Gwybodaeth Trafnidiaeth Gyhoeddus Public Transport Information									
Carmarthen - Rhydaman/Ammanford - Penygarn					Gwasanaeth/Service 129				
dwywaith Ddielach - Cross Hands - Capel Hendre					Yn weithredol i'w bodio o'r 15/11/2011				
Dydd Llun i ddydd Sadwrn (oni nodir fel arall) - Monday to Saturday (unless shown otherwise)									
First Cymru									
am/pm	am	am	pm	pm	am	pm	Su	Su	Su
Codau Diwrnodau/Day Codes									
am/pm	am	am	pm	pm	Su	Su	Su	Su	Su
Carmarthen, Gorsaf Ffysiau Bus Stn	7:15	8:25	10:40	12:50	3:00	3:00	4:40	5:40	7:40
Naricavas, gylfeithypp loches/sheiler	7:23	8:33	10:48	12:58	3:08	3:08	4:48	5:48	7:48
Llanidloes, Is-y-llyn	7:29	8:40	10:55	1:05	3:15	3:15	4:55	5:55	7:54
Portlhwyl, Tŷnau o Wales	7:33	8:44	10:59	1:09	3:19	3:19	4:59	5:59	7:58
Dreilfach, Sgwâr/Square cyntar	7:35	8:47	11:02	1:12	3:22	3:22	5:02	6:02	8:00
Dreilfach, Sgwâr/Square gaddeop	7:38	8:48	11:03	1:13	3:23	3:23	5:03	6:03	8:01
Y Tymbl Uchel, Cwb Ryglu/Rugby Club	7:41	8:53	11:08	1:18	3:28	3:28	5:10	6:10	8:06
Cross Hands, gylfeithypp Llyfrgell/Library	7:46K	8:58	11:13	1:23	3:33	3:33	5:15	6:15	8:11
Parc Busnes Cross Hands Business Park	7:49	9:01	11:17	1:27	3:39	3:39	5:21	6:21	8:17
Gonlas, gylfeithypp Ysgol/School					3:42				
Colofelin, Ysgol Mawr y yrfa	7:55	9:08	11:21	1:31	3:43	3:43	5:25	6:25	8:20
Capel Hendre, gylfeithypp Post/Post Office	7:59	9:13	11:26	1:35	3:48	3:48	5:30	6:30	8:24
Saron, Swyddfa Post Office	8:02	9:17	11:30	1:40	3:52	3:52	5:34	6:34	8:27
Try-dal, gylfeithypp Coleg/College	8:05	9:21	11:34	1:44	3:56	3:56	5:38	6:38	8:31
Rhydaman/Ammanford, Gorsaf Ffysiau Bus Stn cyntar	8:10	9:25	11:38	1:48	4:00	4:00	5:42	6:42	8:35
Rhydaman/Ammanford, Gorsaf Ffysiau Bus Stn gaddeop					3:30	4:02	5:44	6:44	
Panlysiannon, gylfeithypp Gorsaf/Station					3:35	4:07	5:49	6:49	
Hed Penygarn/Penygarn Road					3:38	4:10	5:52	6:52	
Codau Diwrnodau/Day Codes									
am/pm	am	am	pm	pm	Su	Su	Su	Su	Su
Hed Penygarn/Penygarn Road					7:07	7:55	7:57		
Panlysiannon, gylfeithypp Rail Station					7:05	7:58	8:00		
Rhydaman/Ammanford, Gorsaf Ffysiau Bus Stn cyntar					7:11	8:05	8:08		
Rhydaman/Ammanford, Gorsaf Ffysiau Bus Stn gaddeop	6:15	7:13	8:10	9:35	11:45	1:55	3:35	4:35	6:36
Try-dal, Coleg/College	6:17	7:15	8:12	9:37	11:47	1:57	3:37	4:37	6:37
Saron, gylfeithypp Swyddfa Post/Post Office	6:22	7:21	8:18	9:43	11:53	2:03	3:43	4:43	6:42
Capel Hendre, Swyddfa Post Office	6:25	7:25	8:22	9:47	11:57	2:07	3:47	4:47	6:45
Penygarn, gylfeithypp Meddygia/Surgery	6:28	7:28	8:25	9:50	12:00	2:10	3:50	4:50	6:48
Gonlas, Ysgol/School	6:32	7:33	8:30	9:55	12:05	2:15	3:55	4:55	6:52
Colofelin, Ysgol Mawr y yrfa					8:33				
Parc Busnes Cross Hands Business Park	6:35	7:35	8:33	10:00	12:10	2:20	4:00	5:00	6:55
Cross Hands, Llyfrgell/Library	6:38	7:39	8:38	9:58	12:08	2:21	4:01	5:01	6:58
Y Tymbl Uchel, Tynon	6:43	7:44	8:43	10:03	12:13	2:25	4:05	5:05	7:03
Dreilfach, Sgwâr/Square cyntar	6:48	7:50	8:49	10:09	12:19	2:31	4:11	5:11	7:08
Dreilfach, Sgwâr/Square gaddeop	6:48	7:50K	8:49	10:09	12:19	2:31	4:11	5:11	7:08
Portlhwyl, Swyddfa Post Office	6:51	7:53	8:52	10:13	12:23	2:35	4:15	5:15	7:11
Llanidloes, Is-y-llyn	6:55	8:04	9:03	10:18	12:28	2:40	4:20	5:20	7:15
Naricavas, loches/sheiler	7:03	8:11	9:10	10:25	12:35	2:47	4:27	5:27	7:23
Caeffydin/Carmarthen, Gorsaf Ffysiau Bus Stn	7:11	8:20	9:19	10:33	12:43	2:55	4:35	5:35	7:31

Figure 6 – Bus Route Timetables

SECTION 5 – SITE CONTEXT

Existing LDP

Under the provisions of the current Carmarthenshire LDP, the site adjoins the Development Limits (thick black line) for the settlement of Betws, as illustrated in figure 7 below. As has been highlighted earlier in the document the additional development site of Maes Ifan has not been encompassed within the development limits as set out below given the timing of planning consents, the adoption of the current LDP and that of the completion of the site, the boundary of the site is outlined in blue below.

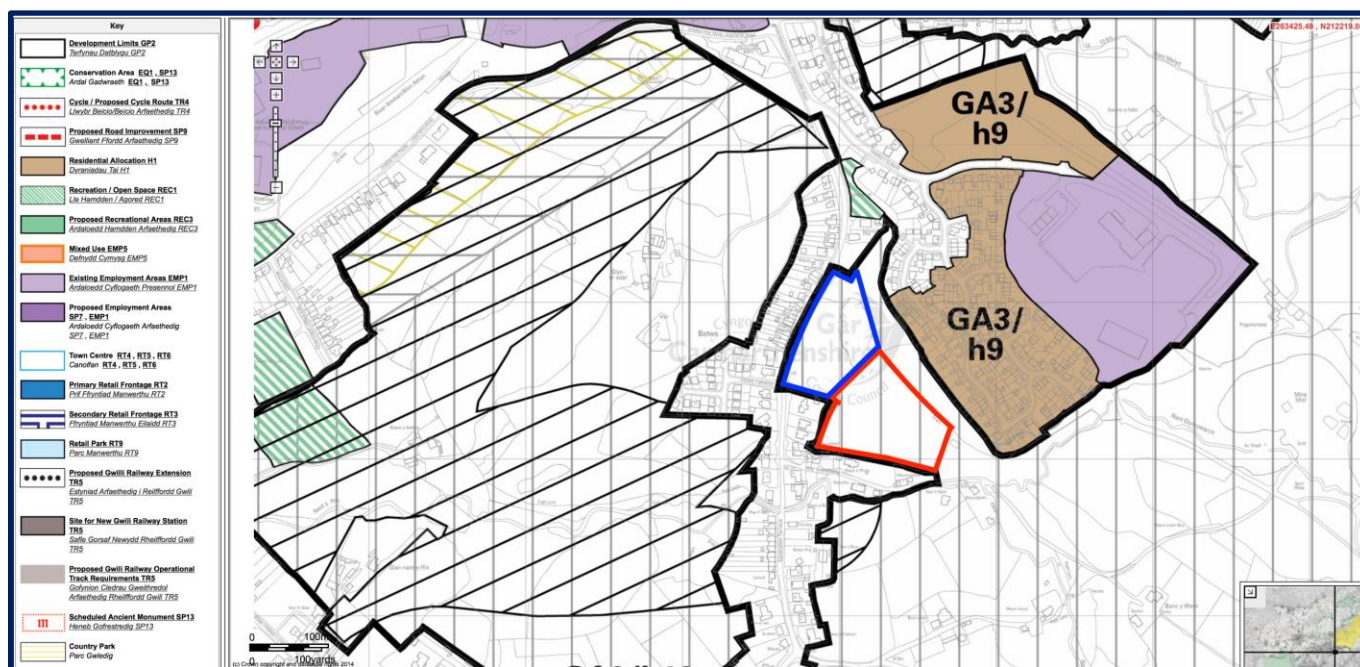


Figure 7 – Carmarthenshire LDP Development Limits (2006 – 2021)

The inclusion of the site and the extension of the development limits proposed by the representations will seek to contribute positively to the aims and strategic objectives of the revised Plan for the following reasons:

- The proposed development will secure much needed additional housing at a key sustainable settlement close to services and facilities, thereby minimising the need to travel. The above information highlights the location of the site in relation to the settlement of Betws and its immediate surroundings which includes the nearby town of Ammanford and its associated facilities which contributes to the sites sustainable location.
- Development at the site will help conserve and enhance the vibrancy of the community, by providing housing development within a key growth area of the plan, thereby minimising the need to deliver housing at more dispersed, less sustainable settlements and villages.
- The proposed allocation will also create a logical rounding off to this area of the settlement of Betws, defined by strong defensible boundaries, which along with existing and proposed landscaping will ensure that development

is assimilated into the landscape. Furthermore, the larger site will provide the opportunity to deliver a wider range and mix of homes including affordable homes.

- Whilst noting that the proposed allocation is greenfield, there are limited opportunities to deliver housing on previously developed land within Betws and such sites are already allocated in the existing LDP.

Proposed Layout

The proposed site plan shown in figure 8 demonstrates that this individual site could be developed to provide a minimum of 19 dwellings yet subject to further detailed design this could be considerably more, which in turn would also allow for the delivery of a number of affordable homes at this key growth area.

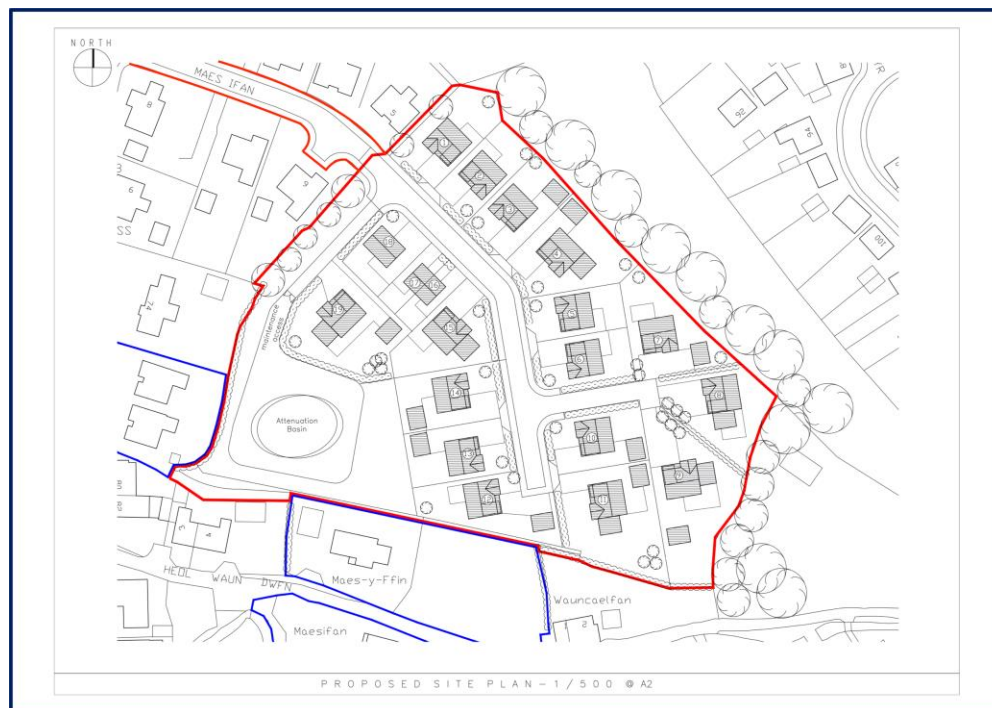


Figure 8 – Proposed Site Plan

Highways

The proposed allocation has through its initial concept design demonstrated how a transition linkage between the approved scheme and that of the promoted site would be achievable and therefore how there would not be any adverse impacts on highway safety or the efficiency on the local network.

Accessibility into and around the site is key to the integration of the development with surrounding community. The road layout and footpath network for the site will be based on providing a legible and accessible scheme which is sustainably located within walking, cycling distance of key services, facilities, and employment opportunities within Betws and Ammanford.

The details of which address the previous concerns raised as part of the previous examination of the LDP where there are now no fundamental hurdles to prevent the site from being adequately accessed.

Environmental

In order to provide further assurances as to the deliverability of the site the following reports and assessments have been commissioned to demonstrate that there are no fundamental aspects that would prevent the site from coming forward as part of the revised LDP:

Flooding

As can be evidenced from the Natural Resources Wales Development Advice Map in appendix 4 the site the subject of the proposed allocation is located outside of any recognised flood risk zone and consequently is not considered to be at risk of flooding.

Ecological Reports

In order to consider any potential ecological value relating to the site a detailed ecological appraisal was undertaken by Fiona Elphick Msc Env. Biol. The full findings of which can be found in appendix 9 of this report. However, in order to summarise those findings and conclusions the following details were evident of the site and its surroundings:

- Rhosydd Castell-Du & Plas y Betws SSSI lies approximately 1km to the east of the survey site. The designated site is in private ownership and not publicly accessible, therefore an increase in residential numbers is unlikely to result in additional footfall and subsequent degradation of habitats within the SSSI. The designated site is also sufficiently distant from the survey site and lacks hydrological connectivity, such that negative impacts as a result of the development are not predicted.
- The vegetation within the site contains no plant species or communities of note or of significant conservation value. No evidence of any protected species was found within the site.
- If the tree belt to the northern edges of the site is suitably buffered to ensure its continued function for wildlife, the site could be developed for residential housing without adverse impacts to local biodiversity.

As a consequence of the above and subject to the detailed recommendations below it was not considered that the development of the site would have any adverse effect on the ecology of the site of the surrounding areas.

- Trees – The line of oak trees inside the western edge of the site boundary should be retained if inspection by an arboriculturist determines that they are suitably healthy. There is an opportunity to include these trees in a buffer strip to protect them from the effects (proximity) of development and this area should remain within the public domain. During construction (particularly excavation of utilities and foundations) it is recommended that all trees and their roots are protected in accordance with BS 5837:2012: Trees in relation to construction.
- The tree belt around the northern edges would also benefit from a buffer to ensure that commuting wildlife species are not disturbed by the proximity of the development. Alternatively, garden boundaries along the line of the existing stock proof fence should be close boarded timber to retain the seclusion of the habitats beyond, available to a range of wildlife species.

- Lighting for the site should be carefully designed and not be allowed to spill onto the existing adjacent tree belt, preventing adverse impacts on foraging and commuting routes for wildlife. As a general guide, a light level of 0.5 lux or less should be maintained at the edge of all tree lines.

Ground Investigations

Given the historic nature of the site as grazed farmland and it being of a greenfield classification devoid of any historic occupation it was not anticipated that there would be any contamination associated with the site. However, given the availability of an historic report which covered the purchased landholding in its entirety, the details of which we're submitted for the adjacent residential site, the report has been reproduced to evidence the site has no issues in terms of ground contamination.

In addition to the above and as part of the ground investigations a Coal Authority Mining Report was also commissioned and whilst there was evidence of mine workings found to be present in the area, the recommendation was not one of objection to the proposals, yet advice that further technical information be sought prior to the commencement of development. The specific details of which can be found in the appendices of appendix 5 of this report.

On the basis of the above and together with the overall planning appraisal the proposed allocation will have no material effect on the historic built environment, cultural heritage, biodiversity, or natural resources of the area.

SECTION 6 – VIABILITY

As can be evidenced from the information contained there are no significant obstacles or constraints to the delivery of the development given the site is within the complete ownership of my client and consequently there are no third parties owners, easements or other title impediments that could prevent the delivery of this site.

The site is located in an area where larger developments have historically been developed to provide much needed housing for the community and the increasing numbers of families moving to the area, where given the on-going investment into schools and services the site would only seek to enhance the vibrancy and community of the area.

The site would be seen as the next phase of the overall development on Maesquarre Road and would logically follow the completion of the initial site of Maes Ifan, where together with the access arrangements and services already in place and abutting the site as a consequence of this earlier phase of development this would allow the immediate progression of the site subject to confirmation of its allocation.

The site could therefore commence as soon as adoption of the revised plan with a completion date two years thereafter. Therefore, providing a significant housing contribution within the initial stages of the plan consequently bridging the gap for the shortfall of housing provisions that is evident given the lack of a 5-year land supply.

The site has no physical constraints or obstructions that would prevent its overall development and does not contain or adjoin any of the following:

- Protected trees or hedgerows;
- Watercourses or water bodies;
- Power lines or other utilities;
- Ecological features;
- Ground conditions or contamination; or
- Listed buildings or other protected structures.

In terms of detailed figures in respect of the various costing and consequently profitability of the adjacent site developed at Maes Ifan this information can be made available on request, should the Inspector or Authority require further assurances beyond the visible delivery of what is a very similar site in terms of both its land status and the way that any future build would take place.

SECTION 7 – PLANNING POLICY

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

With regards to residential development, or housing, the overarching requirements and principle guidance set by national policy can be found at Paragraph 9.2.3 states:

“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.”

At present, Carmarthenshire County Council’s housing supply figure is below the required 5-year land supply level and so it is imperative that this is addressed as quickly as possible to avoid further deterioration of communities and the facilities and services they have to offer.

The instigation of the review of the LDP will form part of addressing this issue, but only if truly sustainable and deliverable allocations are identified and allocated, to replace many of the failing sites that currently form part of the Authority housing and growth strategy for the County, as set out by the current LDP.

In relation to the objective of PPW to utilise previously developed land in preference to greenfield sites (paragraph 4.7.2, 4.9.1 and 9.2.8) whilst the site is greenfield in nature, opportunities for the use of previously developed land in Betws are limited and have already been identified in the existing LDP. Accordingly, the proposed development of the site accords with the requirements of PPW, paragraph 4.7.2, 9.2.8 and 9.2.9.

Dealing specifically with the Candidate Site subject of this report, it is evident that its inclusion within the replacement LDP would adhere to the requirements of Paragraph 9.2.3, in that it is free from any planning, physical or ownership constraint. Accordingly, the allocation of the site and the proposed extension to this allocation is appropriate against the tests of PPW.

SECTION 8 - CONCLUSIONS

The site the subject of these representations, if allocated would represent a logical extension to the existing LDP. Through its inclusion, the site would not be considered to be of detriment to the character and appearance of the settlement nor its environment.

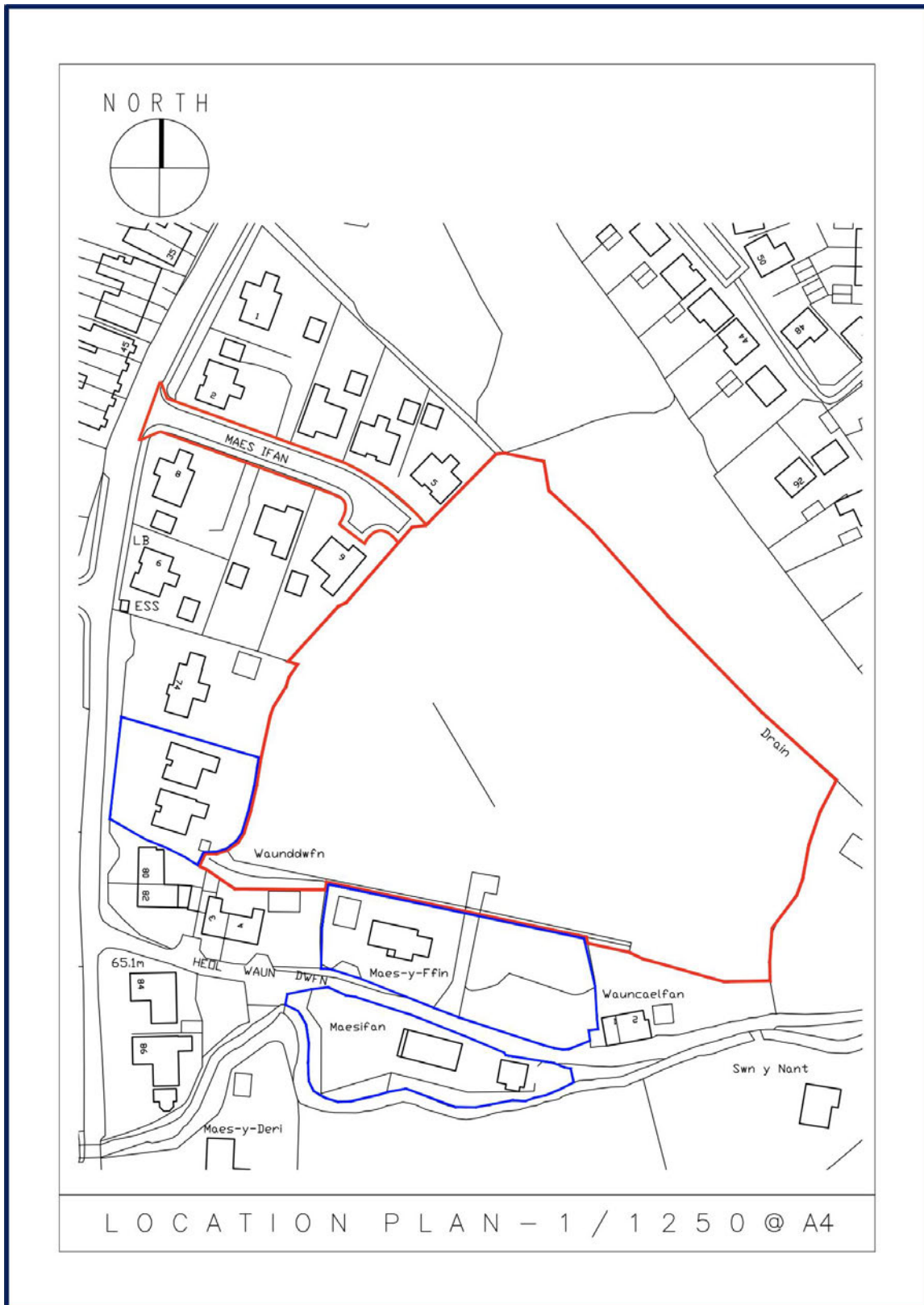
The site will comply with the strategic key objectives of the LDP and is therefore considered to be a realistic and appropriate proposal, which is founded on a robust and credible evidence base in order to meet the test of soundness of the forthcoming revised plan.

The principle of allocating the site at Maesquarre Road for housing is appropriate as the site complies with the search sequence and allocation process provided in Planning Policy Wales. In accordance with paragraphs 4.7.2 and 9.2.9 of PPW, the site is:

- Sustainably located within a growth area to maintain and improve the vitality, attractiveness and viability of the area.
- Within walking and cycling distance of key services, facilities and employment opportunities within Betws and Ammanford, thereby minimising the need to travel particularly by private car.
- Located such that it is already well served by existing and necessary infrastructure to support the proposed development.
- Located in a settlement and a location that will be resilient to climate change and any other impacts of climate change can be dealt with through design and other mitigation measures.
- Is not subject to any physical or environmental constraints on development including flood risk or ecology. (Appendix 4 - Welsh Government Development Advice Map & Appendix 9 – Ecology Statement).

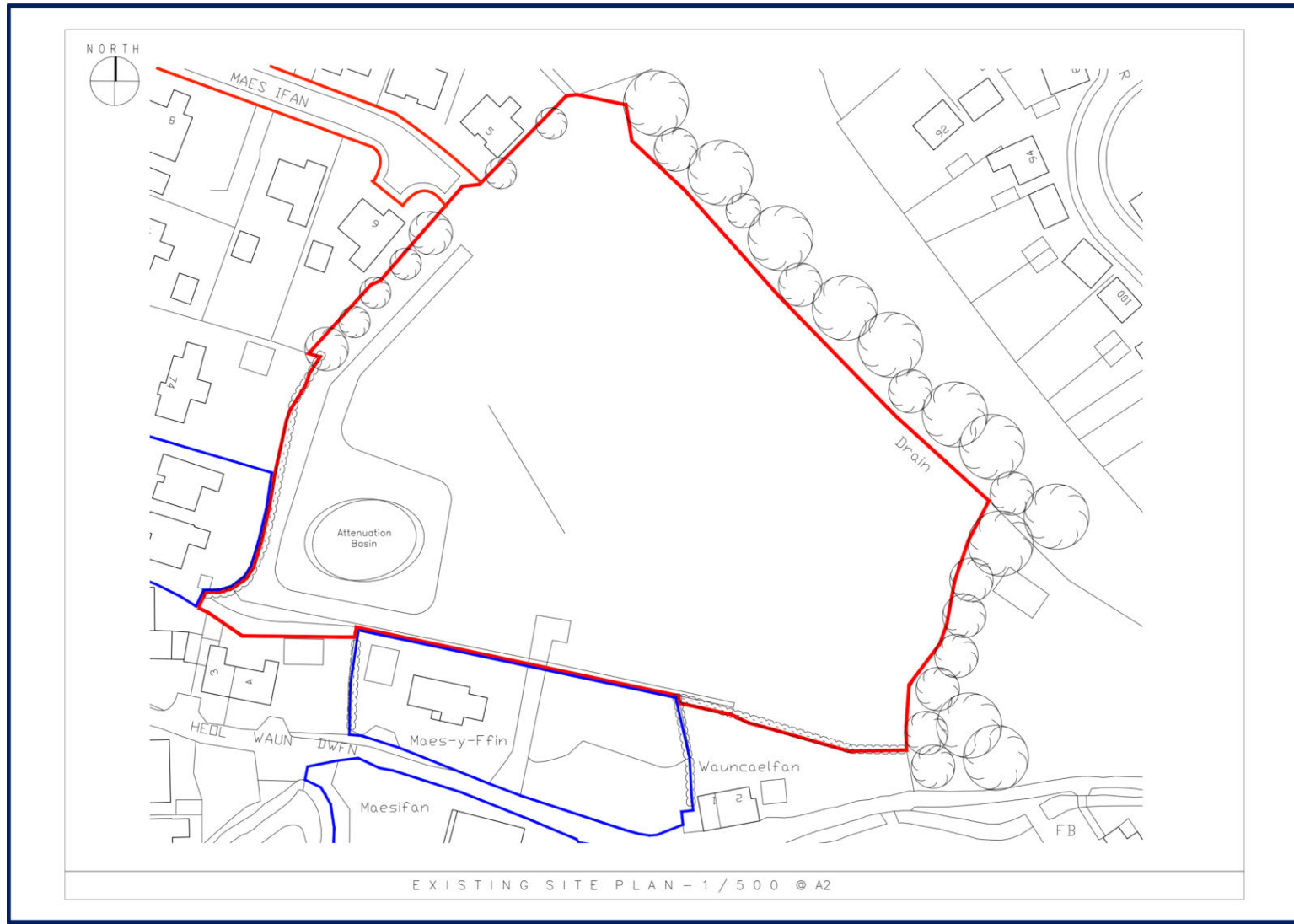
It is therefore on the basis of the above that the applicants respectfully request, that both Members and Officers support the inclusion of the site, in order to help ensure that the housing needs of the County can be realised through the forthcoming Revised LDP.

APPENDIX 1 – SITE LOCATION PLAN



CANDIDATE SITE SUPPORTING STATEMENT – LAND ADJOINING MAIS IFAN, BETWS

APPENDIX 2 – EXISTING SITE PLAN



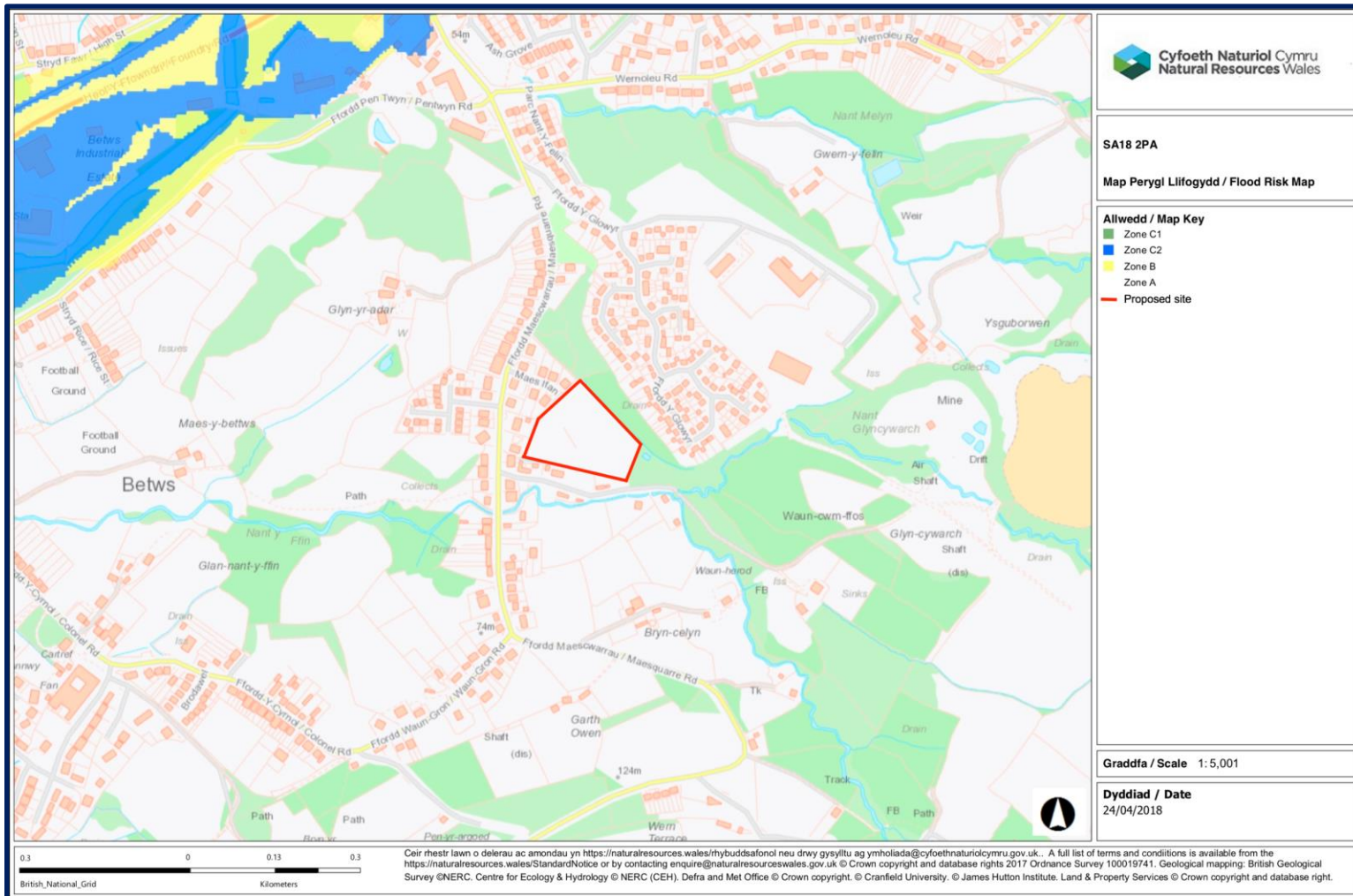
CANDIDATE SITE SUPPORTING STATEMENT – LAND ADJOINING MAES IFAN, BETWS

APPENDIX 3 – PROPOSED SITE PLAN



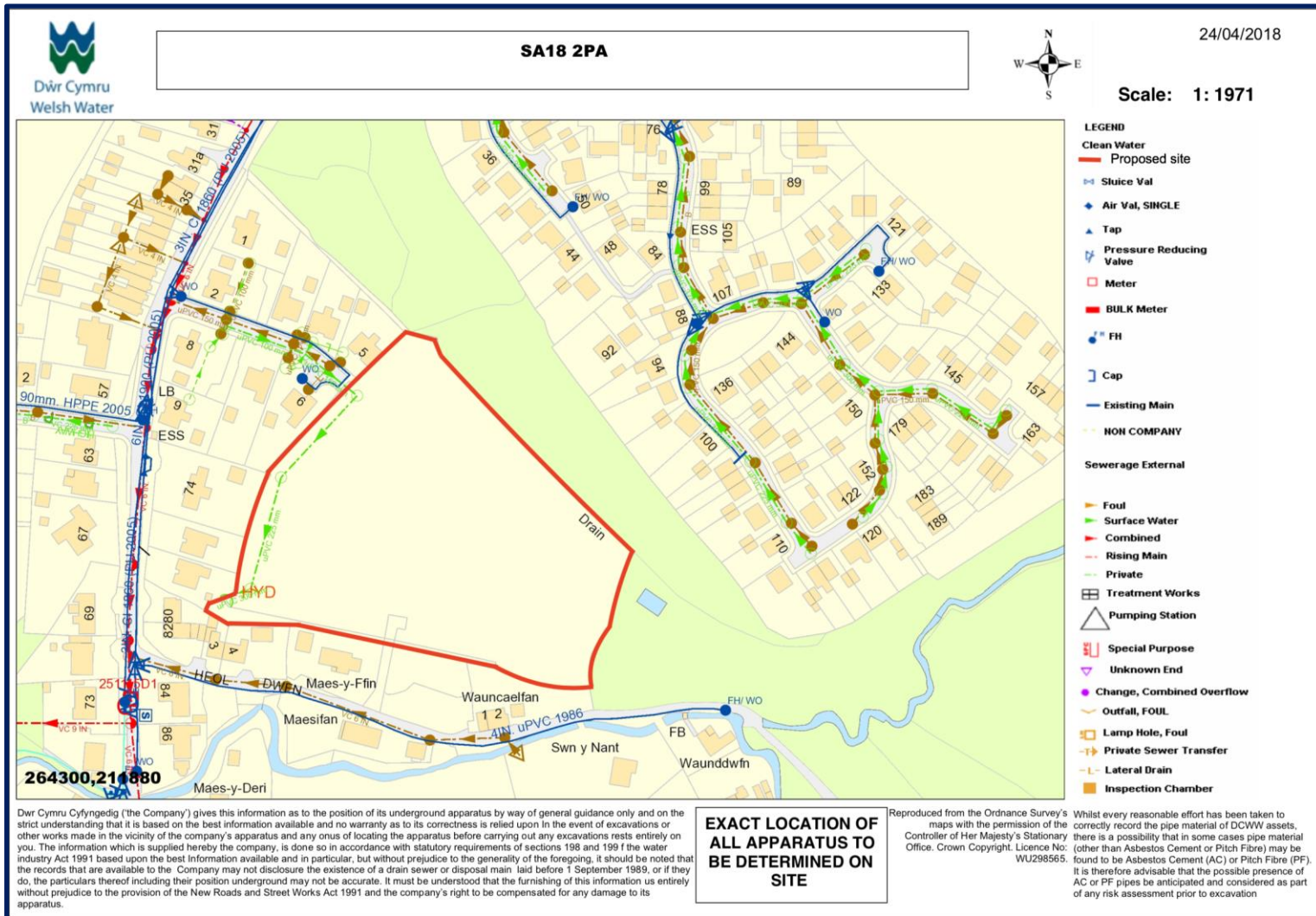
CANDIDATE SITE SUPPORTING STATEMENT – LAND ADJOINING MAIS IFAN, BETWS

APPENDIX 4 – NATURAL RESOURCES WALES – FLOOD RISK MAP



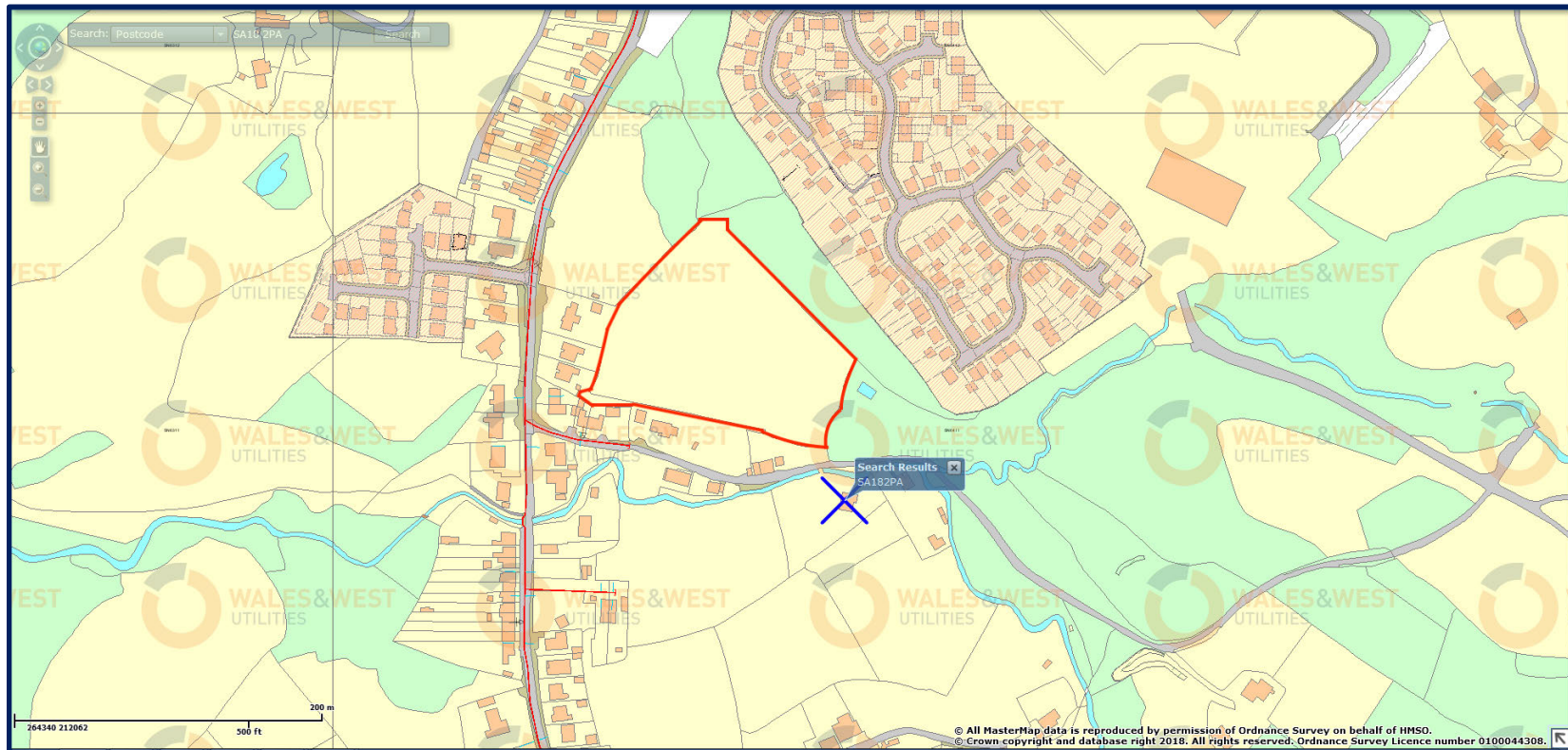
CANDIDATE SITE SUPPORTING STATEMENT – LAND ADJOINING MAIS IFAN, BETWS

APPENDIX 5 – DWR CYMRU/WELSH WATER – UTILITIES PLAN



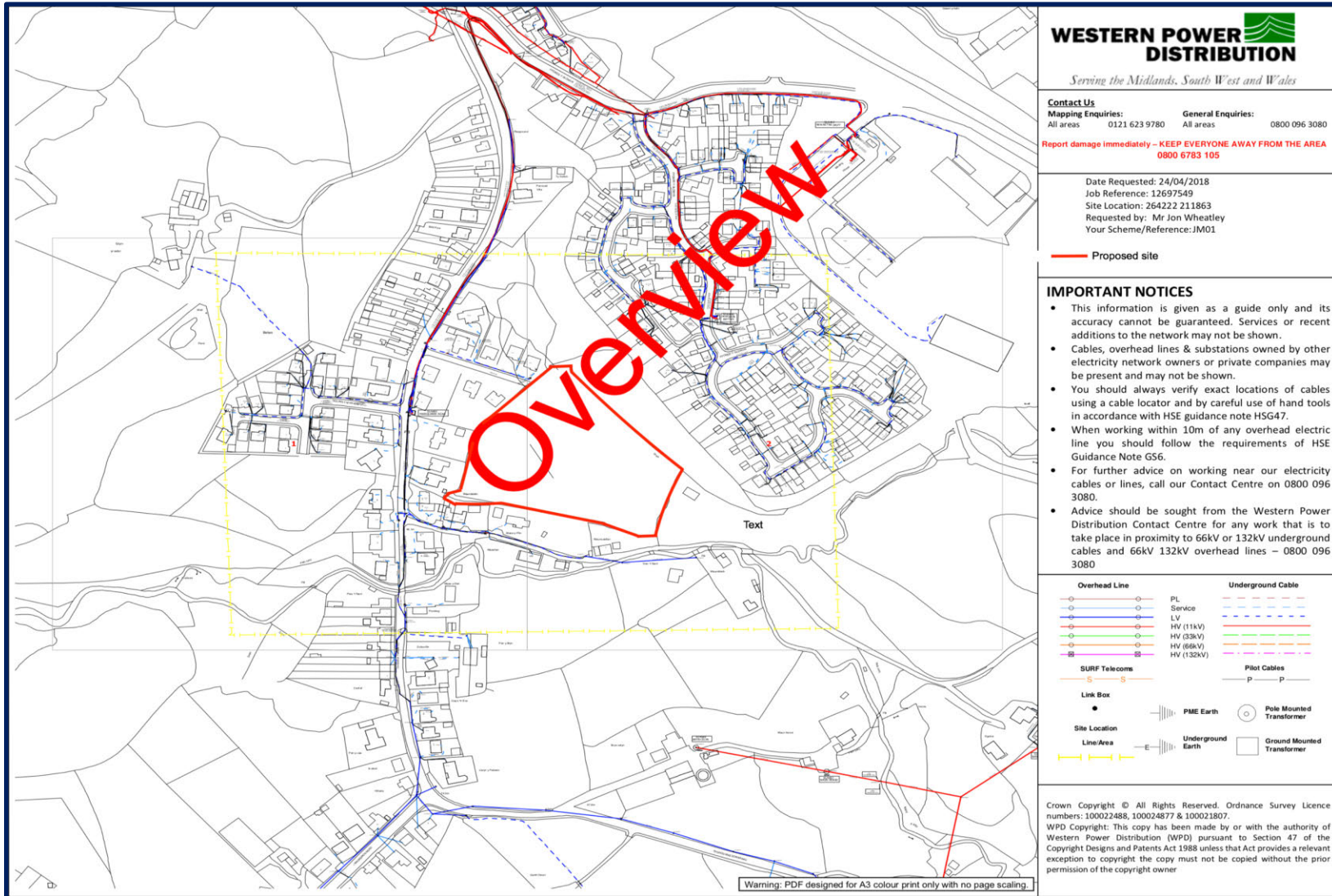
CANDIDATE SITE SUPPORTING STATEMENT – LAND ADJOINING MAIS IFAN, BETWS

APPENDIX 6 – WALES & WEST – UTILITIES PLAN

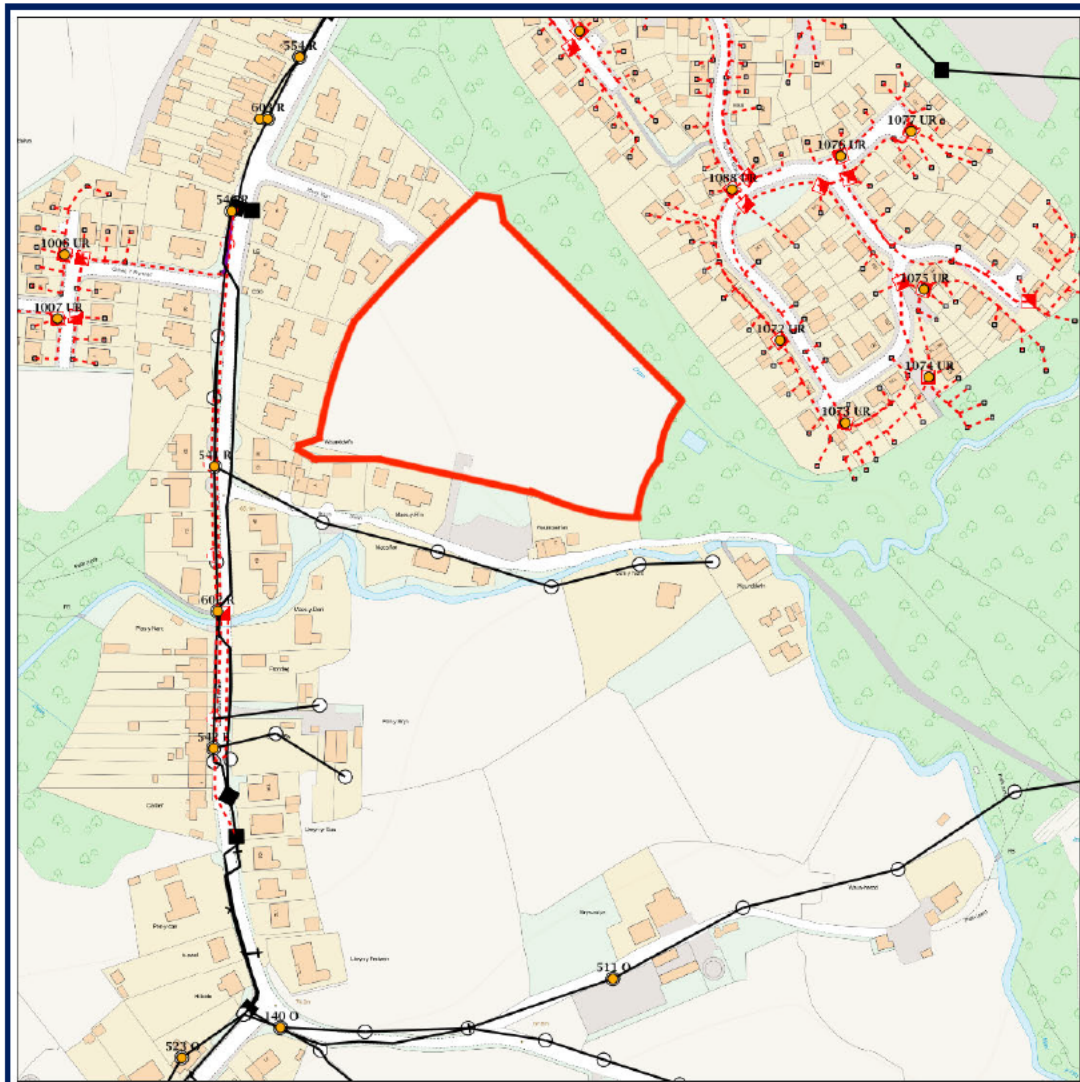


CANDIDATE SITE SUPPORTING STATEMENT – LAND ADJOINING MAIS IFAN, BETWS

APPENDIX 7 – WESTER POWER – UTILITIES PLAN



APPENDIX 8 – BRITISH TELECOM - UTILITIES PLAN



IMPORTANT WARNING

Information regarding the location of BT apparatus is given for your assistance and is intended for general guidance only. No guarantee is given of its accuracy. It should not be relied upon in the event of excavations or other works being made near to BT apparatus which may exist at various depths and may deviate from the marked route.



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KEY TO BT SYMBOLS

DP		Pole	
Planned DP		Planned Pole	
PCP		Joint Box	
Planned PCP		Change Of State	
Built		Split Coupling	
Planned		Duct Tee	
Inferred		Planned Box	
Building		Manhole	
Kiosk		Planned Manhole	
Hatchings		Cabinet	
		Planned Cabinet	

Proposed site

Other proposed plant is shown using dashed lines.
 BT symbols not listed above maybe disregarded.
 Existing BT Plant may not be recorded.
 Information valid at time of preparation

BT Ref : NZI03076P
 Map Reference : (centre) SN6427911769
 Easting/Northing : (centre) 264279,211769
 Issued : 24/04/2018 15:08:15

APPENDIX 9 – ECOLOGICAL REPORT

ECOLOGICAL APPRAISAL REPORT

LAND AT

Maes Ifan,
Maesquarre Road, Betws, Ammanford, SA18 2PA

Survey Date –5th May 2018

Survey carried out and report produced by

**Fiona Elphick MSc Env. Biol.,
Ecological Consultant and Licensed Bat Worker**
3 Peddles Lane, Charlton Mackrell, Somerton, Somerset, TA11 6AQ.

Tel: [REDACTED]
Email: [REDACTED]

Mr P A Roberts

**FIELDS TO EAST OF MAESQUARRE ROAD,
AMMANFORD**

Site Investigation Report

11165/SI/13

Intégral
Géotechnique

FULL PLANNING PERMISSION

ENZO'S HOMES LTD - ENZO SAURO
C/O - AGENT

Application No: **E/31546** registered: 09/02/2015 for:

Proposal : PROPOSALS INCLUDE THE CONSTRUCTION OF AN ATTENUATION BASIN AND ASSOCIATED DRAINAGE WORKS TO DISCHARGE THE SURFACE WATER FROM THE 9 PROPERTIES PROPOSED UNDER PLANNING APPLICATION REFERENCE: E/31337

Location : LAND AT REAR OF MAESQUARRE ROAD AND HEOL WAUN DAFEN, BETWS, AMMANFORD, SA18 2PA

Carmarthenshire County Council HEREBY GRANT FULL PLANNING PERMISSION for the development proposed by you as shown on the application form, plan(s) and supporting document(s) subject to the following condition(s):

CONDITIONS

- 1 The development hereby permitted shall be commenced before the expiration of five years from the date of this permission.
- 2 The development hereby permitted shall be completed and operational before the beneficial occupation of the residential development approved under Outline Permission E/26857 and Reserved Matters approval E/31337.

REASONS

- 1 Required to be imposed pursuant to Section 91 of the Town and Country Planning Act 1990.
- 2 To ensure satisfactory surface water drainage from the residential site.

NOTES

- 1 The above approved development relates to the following plans and documents and works should be carried out strictly in accordance with them unless amended by any conditions above:
 - The Block and Location Plans 1:1500, 1:2500 @ A3 [LP-01]
 - Proposed Site Layout showing Attenuation Basin 1:200 @ A1 [18548-05]
 - Site Infrastructure Plan 1:500 @ A1 [18458-03]
 - Attenuation Basin Plan and Sections 1:200 @ A1 [18458-04]

- 2 Please note that this permission is specific to the plans and particulars approved as part of the application. Any departure from the approved plans will constitute unauthorised development and may be liable to enforcement action. You (or any subsequent developer) should advise the Council of any actual or proposed variations from the approved plans immediately so that you can be advised how to best resolve the matter.

In addition, any conditions which the Council has imposed on this permission will be listed above and should be read carefully. It is your (or any subsequent developers') responsibility to ensure that the terms of all conditions are met in full at the appropriate time (as outlined in the specific condition).

The commencement of development without firstly meeting in full the terms of any conditions which require the submission of details prior to commencement if development will constitute unauthorised development. This will necessitate the submission of a further application to retain the unauthorised development and may render you liable to formal enforcement action.

Failure on the part of the developer to observe the requirements of any conditions could result in the Council pursuing formal enforcement action in the form of a Breach of Condition Notice.

- 3 This application has been determined within the scope of the delegated authority granted to the Head of Planning by the Meeting of Carmarthenshire County Council on 12 October 2011 (Minute No 7 refers).

REASONS FOR GRANTING PLANNING PERMISSION

The decision to grant planning permission has been taken in accordance with Section 38 of the Planning and Compulsory Purchase act 2004, which requires that, in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise.

- The proposed development accords with Policy SP2 of the LDP in that the development seeks to minimise and adapt to impacts of climate change by providing a suitable SUDS system.

DECISION DATE: 23/03/2015

SIGNED:



Development Management Manager
for and on behalf of
EIFION W BOWEN, BSc, Dip TP, MRTPI
HEAD OF PLANNING

APPROVAL OF RESERVED MATTERS

ENZOS HOMES - ENZO SAURO
C/O AGENT

Application No: **E/31337** registered: 16/12/2014 for:

Proposal : PROPOSED RESIDENTIAL DEVELOPMENT OF 9 DWELLINGS

Location : LAND TO THE EAST OF (OPPOSITE 31A-53) MAESQUARRE ROAD, BETWS,
AMMANFORD, SA18 2PA

Carmarthenshire County Council HEREBY APPROVE RESERVED MATTERS for the details specified by you as shown on the application form, plan(s) and supporting document(s), reserved for the subsequent approval by the Council in the previous outline planning permission, subject to the following ADDITIONAL condition(s):

CONDITIONS

1. The development shall be commenced before whichever is the later of:-
 - a) the expiration of five years from the date of the outline planning permission to which this development relates
 - or
 - b) the expiration of two years from the date of approval of the last of the reserved matters to be approved.
2. Prior to its use by vehicular traffic, the new access road shall be laid out and constructed with minimum 5.0 metre carriageway, 2.0 metre footways, and 6 metre kerbed radii at the junction with Maesquarre road. The access shall be located in a place to achieve a 2.4 x 59 visibility splay.
3. There shall at no time be any growth or obstruction to visibility over 0.9 metres above the adjacent carriageway crown, over the site's whole Maesquarre Road frontage within 2.4 metres of the near edge of the highway.
4. The vehicular access into the site shall at all times be left open, unimpeded by gates or any other barrier.
5. The approved parking and turning facilities within the curtilage of the site shall be dedicated to serve the proposal and is to be fully implemented prior to any part of the development being brought into use, and thereafter shall be retained, unobstructed, in perpetuity. In particular, no part of the parking or turning facilities is to be obstructed by non-motorised vehicles.

- 6 Prior to commencement of any part of the development herewith approved, a 2.0 metre wide footway shall be provided along the entire site frontage with Maesquarre Road. This work shall be completed to the written approval of the Local Planning Authority, and to the specification of the Local Highway Authority.
- 7 The garages hereby permitted shall be used for the parking and domestic ancillary use of the occupiers of the associated dwellings only and shall not be used for any trade business or commercial purposes.

REASONS

1. Required to be imposed pursuant to Section 91 of the Town and Country Planning Act 1990.
- 2-6. In the interests of highway safety.
7. In the interest of residential amenity.

NOTES

1. The above approved development relates to the following plans and documents and works should be carried out strictly in accordance with them unless amended by any conditions above:
 - The 1:2500 and 1:1250 scale Location Plans and Block Plans at A3 received on 24 November 2014;
 - The 1:500 scale Site Infrastructure Plan at A1 received on 11 December 2014;
 - The 1:500 and 1:200 scale Site Plan and Cross Section at A2 received on 11 December 2014;
 - The 1:250 scale Proposed Landscaping Plan at A2 received on the 18 December 2014;
 - The 1:100 scale House Type Elevations and Floor Plans at A2 received on 24 November 2014 and the
 - The 1:100 and 1:50 scale Proposed Garages Elevations and Floor Plans at A3 received on 24 November 2014
2. Please note that this permission is specific to the plans and particulars approved as part of the application. Any departure from the approved plans will constitute unauthorised development and may be liable to enforcement action. You (or any subsequent developer) should advise the Council of any actual or proposed variations from the approved plans immediately so that you can be advised how to best resolve the matter.

In addition, any conditions which the Council has imposed on this permission will be listed above and should be read carefully. It is your (or any subsequent developers') responsibility to ensure that the terms of all conditions are met in full at the appropriate time (as outlined in the specific condition).

The commencement of development without firstly meeting in full the terms of any conditions which require the submission of details prior to commencement if development will constitute unauthorised development. This will necessitate the submission of a further application to retain the unauthorised development and may render you liable to formal enforcement action.

Failure on the part of the developer to observe the requirements of any conditions could result in the Council pursuing formal enforcement action in the form of a Breach of Condition Notice.

3. Comments and guidance received from consultees relating to this application, including any other permissions or consents required, is available on the Authority's website (www.cararthenshire.gov.uk)
4. This application has been determined within the scope of the delegated authority granted to the Head of Planning by the Meeting of Carmarthenshire County Council on 12 October 2011 (Minute No 7 refers).

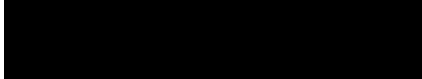
REASONS FOR GRANTING PLANNING PERMISSION

The decision to grant planning permission has been taken in accordance with Section 38 of the Planning and Compulsory Purchase act 2004, which requires that, in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise.

- It is considered that the proposed development complies with policy GP1 of the Carmarthenshire Local Development Plan, 2014 (LDP) in that would conform with the character of the area in terms of appearance, scale, details, height, massing and will utilise appropriate materials. Additionally, it would not have a significant impact upon the amenity of adjacent land uses, properties or their residents and incorporates suitable hard and soft landscaping details. The site is served by an acceptable access and provides for the satisfactory generation, treatment and disposal of both surface and foul water.
- It is considered that the proposed development complies with policy H2 of the Carmarthenshire Local Development Plan, 2014 (LDP) in that the development is built in accordance with the policies and strategies of the previous UDP and the current LDP.
- It is considered that the proposed development complies with policy SP14 in that the development respects the site's natural assets and features of nature conservation value.

DECISION DATE: 17/03/2015

SIGNED:


Development Management Manager
for and on behalf of
EIFION W BOWEN, BSc, Dip TP, MRTPI
HEAD OF PLANNING

OUTLINE PLANNING PERMISSION

MR ALAN ROBERTS
GLAN NANT Y FFIN
COLONEL RD
BETWS
AMMANFORD
SA18 2HR

Application No: **E/26857** received: 12/07/2012 for:

Proposal : OUTLINE PLANNING APPLICATION FOR 9 RESIDENTIAL DWELLINGS, HIGHWAYS ACCESS & ASSOCIATED WORKS

Location : LAND TO THE EAST OF (OPPOSITE 31A-53) MAESQUARRE ROAD, AMMANFORD, SA18 2PA

Carmarthenshire County Council HEREBY GRANT OUTLINE PLANNING PERMISSION for the development proposed by you as shown on the application form, plan(s) and supporting document(s) subject to the following condition(s):

CONDITIONS

- 1 Application for approval of reserved matters must be made to the Local Planning Authority before the expiration of three years from the date of this permission, and the development must be commenced not later than whichever is the later of the following:-
 - a) the expiration of five years from the date of this outline planning permission;
 - b) the expiration of two years from the date of approval of the last of the reserved matters to be approved.
- 2 The permission now granted is an outline permission only, within the meaning of the Town and Country Planning (General Development Procedure) Order 1995.
- 3 Development shall not commence until detailed plans of the layout, appearance, scale, landscaping of the development have been submitted, and received the written approval of the Local Planning Authority.
- 4 No development shall take place until there has been submitted to and approved in writing by the Local Planning Authority a scheme of landscaping for the entire site which shall include a full survey of all existing trees and hedgerows on the land, and details of any to be retained together with measures for their protection to BS 5837 standard during the course of the development, and thereafter shall be retained in perpetuity.

- 5 All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the completion of the development and any trees or plants which within a period of 5 years from the commencement of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variations and thereafter shall be retained in perpetuity.
- 6 Prior to its use by vehicular traffic, the new access road shall be laid out and constructed with minimum 5.0 metre carriageway, 2.0 metre footways, and 6 metre kerbed radii at the junction with Maesquarre road. The access shall be located in a place to achieve a 2.4 x 59 metre visibility splay.
- 7 There shall at no time be any growth or obstruction to visibility over 0.9 metres above the adjacent carriageway crown, over the site's whole Maesquarre Road frontage within 2.4 metres of the near edge of the highway.
- 8 The vehicular access into the site shall at all times be left open, unimpeded by gates or any other barrier.
- 9 Prior to the commencement of development the written approval of the Local Planning Authority shall be obtained for a scheme of parking and turning facilities within the curtilage of the site, and this shall be dedicated to serve the proposal. The approved scheme is to be fully implemented prior to any part of the development being brought into use, and thereafter shall be retained, unobstructed, in perpetuity. In particular, no part of the parking or turning facilities is to be obstructed by non-motorised vehicles.
- 10 Prior to commencement of any part of the development herewith approved, a 2.0 metre wide footway shall be provided along the entire site frontage with Maesquarre Road. This work shall be completed to the written approval of the Local Planning Authority, and to the specification of the Local Highway Authority.
- 11 The development hereby permitted shall not be commenced until such time as a scheme to dispose of foul drainage has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.
- 12 Development shall not begin until a surface water drainage scheme for the site, based on sustainable drainage principles has been submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.
- 13 No development approved by this permission shall be commenced until a Method Statement detailing all necessary pollution prevention measures for the construction phase of the development is submitted to and approved in writing by the Local Planning Authority.
- 14 The new dwellings hereby permitted shall be constructed to achieve a minimum Code for Sustainable Homes Level 3 and achieve a minimum of 1 credit under category 'Ene1 - Dwelling Emission Rate' in accordance with the requirements of the Code for Sustainable Homes: Technical Guide November 2010. The development shall be carried out entirely in accordance with the approved assessment and certification.

- 15 Construction of any dwelling hereby permitted shall not begin until an 'Interim Certificate' has been submitted to the Local Planning Authority, certifying that a minimum Code for Sustainable Homes Level 3 and a minimum of 1 credit under 'Ene1 - Dwelling Emission Rate', has been achieved for that individual dwelling or house type in accordance with the requirements of the Code for Sustainable Homes: Technical Guide November 2010.
- 16 Prior to the occupation of the dwellings hereby permitted, a Code for Sustainable Homes 'Final Certificate' shall be submitted to the Local Planning Authority certifying that a minimum Code for Sustainable Homes Level 3 and a minimum of 1 credit under 'Ene1 - Dwelling Emission Rate', has been achieved for that dwelling in accordance with the requirements of the Code for Sustainable Homes: Technical Guide November 2010.
- 17 The permission hereby granted relates to a maximum of nine dwellings.

REASONS

- 1 Required to be imposed pursuant to Section 91 of the Town and Country Planning Act 1990.
- 2 The application is in outline only.
- 3-5 In the interest of visual amenity.
- 6-10 In the interest of Highway safety.
- 11 To enhance and protect water quality.
- 12 To prevent the increased risk of flooding and to improve and protect water quality.
- 13 For the prevention of pollution
- 14-16 To ensure the provision of sustainable homes.
- 17 The development of the site for more than nine dwellings shall require community benefit contributions in terms of affordable housing, education and the maintenance of local recreational facilities in accordance with policy GDC33 of the Carmarthenshire Unitary Development Plan.

NOTES

- 1 The developer is recommended to satisfy the Director of Operations, Chief Assistant (Hydrology), Parc Myrddin, Carmarthen of the Carmarthenshire County Council on the mode of foul and surface water drainage to serve the proposed site, and prior to the submission of an approval of reserved matters application, the developer should establish and agree full details of the drainage.
- 2 The developer is strongly advised to contact Western Power Distribution prior to any development, in order to ascertain Western Power Distribution's requirements for the protection of any existing services and to obtain details of them. This could avoid a serious accident and the developer paying costs of repairs.
- 3 Please note that this permission is specific to the plans and particulars approved as part of the application. Any departure from the approved plans will constitute unauthorised

development and may be liable to enforcement action. You (or any subsequent developer) should advise the Council of any actual or proposed variations from the approved plans immediately so that you can be advised how to best resolve the matter.

In addition, any conditions which the Council has imposed on this permission will be listed above and should be read carefully. It is your (or any subsequent developers') responsibility to ensure that the terms of all conditions are met in full at the appropriate time (as outlined in the specific condition).

The commencement of development without firstly meeting in full the terms of any conditions which require the submission of details prior to commencement if development will constitute unauthorised development. This will necessitate the submission of a further application to retain the unauthorised development and may render you liable to formal enforcement action.

Failure on the part of the developer to observe the requirements of any conditions could result in the Council pursuing formal enforcement action in the form of a Breach of Condition Notice.

- 4 Further advice and guidance from Dwr Cymru Welsh Water is contained in their correspondence dated 24 January 2012, appended to this permission.
- 5 Further advice and guidance from the Environment Agency is contained within their correspondence dated 27 July 2012, appended to this permission.
- 6 Further advice and guidance from the Authority's Biodiversity Officer is contained within the correspondence dated 26 July 2012, appended to this permission
- 7 All surface water from the development herewith approved shall be trapped and disposed of so as to ensure that it does not flow on to any part of the public highway.
- 8 No surface water from the development herewith approved shall be disposed of, or connected into, existing highway surface water drains.
- 9 If the applicant intends to offer the proposed estate road for adoption to the highway Authority under Section 38 of the Highways Act 1980, then he is advised to contact the Authority's Highways Adoptions officer Mr Cliff Cleaton, at the earliest opportunity.
- 10 Any amendment or alteration of an existing public highway in connection with a new development shall be undertaken under a Section 278 Agreement of the Highways Act 1980. It is the responsibility of the developer to request the Local Highway Authority to proceed with this agreement and the developer is advised that the total costs of entering into such an agreement, as well as the costs of undertaking any physical works on site, shall be met by him.
- 11 It is the responsibility of the developer to contact the Streetworks Manager of the Local Highway Authority to apply for a Streetworks Licence before undertaking any works on an existing Public Highway.
- 12 The footway fronting the site should be constructed via a Section 278 Agreement or if the site is to be adopted can be done via a Section 38 Agreement.

- 13 The development hereby permitted shall be carried out strictly in accordance with the amended 1:1250, 1:500 and 1:250 scale plans received on 12 July 2012.


SUMMARY REASONS FOR APPROVAL

In accordance with Article 3 of the Town and Country Planning (General Development Procedure) (Wales) (Amendment) Order 2004, the Council hereby certify that the proposal as hereby approved conforms with the relevant policies of the Development Plan (comprising the Carmarthenshire Unitary Development Plan 2006) and material considerations do not indicate otherwise. The policies, which refer, are as follows:

- The proposed development accords with Policy GDC2 of the UDP in that the proposal of the area represents an acceptable form of development which will not harm the character of the area by virtue of density, plot ratio or scale and would be detrimentally harmful to the amenity and privacy of the occupiers of any neighbouring dwellings.
- The proposed development accords with policies GDC11 and GDC12 in that the proposed access is suitable to serve the proposed development and that the development would not lead to issues of highway safety.
- The proposed development accords with policy H1 of the UDP in that the proposal is allocated for housing development, situated within the development limits of Betws.

DECISION DATE: 06/12/2012

SIGNED: _____


Graham Noakes
Senior Development Management Officer
for and on behalf of
EIFION W BOWEN, BSc, Dip TP, MRTPI
HEAD OF PLANNING

Carmarthenshire Local Development Plan 2006 – 2021
Hearing Session 14: Site Allocations & Alternative Sites Ammanford 1



Site Reference Number: 004-007 – Maesfan, Maesquarre Road, Betws, Ammanford.

Respondent Number: 619 - Mr A Roberts
Report Author: Trystan Mabbitt - MRTPI

Introduction

This representation is provided as supplementary evidence to the previous submissions made by Mr A Roberts in relation to the Local Development Plan (LDP). The focus of these comments relates to questions and issues raised in the Inspector's Matters and Issues which sets out the agenda to Hearing Session 14.

It should be noted that these representations do not respond to every question raised within the Inspector's Matters and Issues, as all of these questions are not necessarily relevant. Accordingly, these representations only provide responses to questions where it is considered necessary and relevant to do so.

The representation hereby submitted should be read in conjunction with submission GR3/11, which highlights the specific considerations for why that site should remain allocated as per the current UDP, especially given its recently granted outline planning approval on the 6th of December 2012 under planning reference E/26857 for 9 dwellings.

This paper together with the above mentioned representation seeks to extend the extant consent and extend the development limits in order to contribute to the strategic objectives of the plan.

Site Reference – GR3/11 – Outline approval for 9 dwellings (Planning reference – E/26857)

Site Reference – 004-007 – Indicative layout of 16 dwellings (yet this could be up to 21 dwellings subject to detailed design)

On the basis of the above the sites collectively could therefore provide the opportunity to deliver up to 30 new homes. Together with significantly more land to enable the delivery of affordable housing provisions and sensitive landscaping to aid the integration of the development of this site into the village of Betws and that of the surrounding landscape.

Is the Council's decision not to allocate the alternative site based on a robust and rational site selection process?

Having considered the evidence base for not seeking to allocate the promoted site within the LDP there seems to be no robust evidence to support its exclusion from the emerging LDP.

The assessments by the LPA of the candidate site put forward under this representation are discussed further below:

- Access/Highways. The site does not have an available access point with adequate visibility and/or development on the site would impact upon the highway network and increase the risk to highway safety.
- The site is located within or related to a conservation area.

The summary feedback then goes on to state that:

“Access to the site has not been identified; there are sufficient and more appropriate residential development opportunities elsewhere within the settlement”

In seeking to address the concerns relating to the above:

There has since the initial LPA appraisal been significant developments and advances in seeking to overcome the highway concerns. As a consequence of the progression of the adjacent site (which is in the same ownership) an outline application detailing the site access and road layout has been submitted to and approved by the local planning Authority under planning reference E/26857 as mentioned above.

This development has through its design allowed a transition linkage between the approved scheme and that of the promoted site, which has consequently addressed the concerns raised previously whereby there are now no fundamental hurdles to prevent the site from being adequately accessed. The design and access statement provided for the approved outline application is attached to representation GR3/11, whereby the access details are attached in appendix 1 and 2 of this report.

The development of the site is therefore not anticipated to have any adverse impacts on highway safety or the efficiency on the local network, given that a suitable vehicular and pedestrian access can be extended from the spur in the approved site to the promoted site off Maesquarre Road as demonstrated in the appendices.

Accessibility into and around the site is key to the integration of the development with surrounding community. The road layout and path network for the site will be based on providing a legible and accessible scheme which is sustainably located within walking, cycling distance of key services, facilities, and employment opportunities within Betws and Ammanford.

In relation to the concerns raised in respect of the conservation area further work has been undertaken to understand the rationale behind this reasoning. However, no specific sites have been identified in the immediate area and nor has there been any further allocations identified within the plan. This information together with an earlier sustainability appraisal seeks to conclude that the development given its location would not have any adverse impact upon conservation areas and for that reason should not be prevented from being allocated. Further details in relation to this can be found within the initial LDP representation.

On the basis of the above the promoted site would be seen as creating a logical extension to site GR3/11 which already benefits from outline consent under planning reference E/26857 which was approved on the 6th of December 2012 and as discussed under representation GR3/11.

The non inclusion of the site does not therefore appear to be robust or have followed a rational process for defining the extent of the proposed allocation which would consequently fail the test of Soundness CE2.

Why is the allocation of the alternative site required in order to make the LDP sound?

It is not considered that there is sufficient evidence to demonstrate that the proposed allocated sites will deliver the proposed housing during the Plan period. Questions are raised in regards to the ability of the Plan to deliver the assessed housing needs, particularly having regard to the low flexibility allowance which has been built into the Plan which will constrain the ability of the Plan to respond to allocated sites failing to be delivered over the Plan period.

Through the limited flexibility provided within the Plan to deal with changes to current data assumptions and / or changes in circumstances over the Plan period. It is therefore considered that a greater flexibility / contingency allowance should be provided to deal with such changes. If a number of sites allocated within the LDP fail to come forward, it is considered that the Council will fail to maintain a five year housing land supply, and will be unable to provide for the assessed housing need in the area. The implications of a relatively small number of sites failing to come forward could be particularly significant considering the small flexibility allowance which has been provided for within the LDP's housing land supply.

In addition to this it is considered that the LDP's estimate of windfall and small sites coming forward is not realistic. The allowances for windfall sites and for small sites, provides 18.3% of the housing land supply within the Plan, which represents a significant proportion of the total housing supply. It is not considered sound that such a high percentage of the total housing supply should be relied upon.

In recent years - 2008/2009 the total number of dwellings that came forward through windfall sites was only 88 units, in 2009/2010 only 60 units came forward, whilst in 2010/2011, 101 units came forward, as confirmed within the Carmarthenshire Council's Windfall and Small Sites Topic Paper 12 (June 2013) and as derived from the Joint Housing Land Availability Schedules.

Accordingly, based on these recent trends, and the fact that significant numbers of windfall sites have already come forward in recent years it is not considered that the housing provision on windfall sites will be developed at the level of 102 dwellings per annum anticipated and proposed given the limited supply.

In addition, the expected level of development to come forward on small sites is considered to be significantly high and reflects a significant increase in what is currently being experienced under the UDP (up from 77 units per annum to that of 97 units)

In combination, it is not considered that the high levels of windfall sites along with increased levels of small sites is realistic, and may lead to the LDP having difficulties in providing for required levels of housing growth.

It is therefore considered that the LDP overestimates the levels of dwellings expected to come forward on windfall sites within the LDP, which is likely to result in an under provision in the total dwelling supply. This over reliance on windfall sites will therefore restrict the ability of the LDP to provide for the housing needs of the local population.

On the basis of the above it is therefore considered to be vitally important that sufficient land is allocated within the LDP in order to ensure that there is flexibility to meet the required housing needs. The allocation of the site hereby promoted would therefore accord with the objectives of PPW, WSP and LDP of delivering housing (both market and affordable) and help to rebalance the plan to meet the test of soundness CE1 to CE4.

How would the alternative site contribute to the aims and strategic objectives of the Plan?

Housing development at the site as proposed by the representations will contribute positively to the aims and strategic objectives of the Plan (SO1-SO14) for the following reasons:

Development at the site will comply with SO1 in helping to conserve and enhance the vibrancy of communities, by providing housing development within a key growth area of the plan, thereby minimising the need to deliver housing at more dispersed, less sustainable settlements and villages. This will also reduce the reliance of the Plan upon the delivery of windfalls, small sites, and undelivered UDP allocations providing a Plan Led system with a greater certainty of supply and delivery as discussed above and in accordance with SO3.

The proposed development will secure much needed additional housing at a key sustainable settlement close to services and facilities, thereby minimising the need to travel, in accordance with SO2 of the LDP. The plan highlighted on the front cover identifies the location of the site in relation to the settlement of Betws and its immediate surroundings which includes the nearby town of Ammanford. The local area contains a number of schools ranging from nursery through primary, junior and secondary schools. There are also a number of churches as well as medical facilities including chemists, GP surgeries and a dentist. The area also offers numerous banks and building societies together with a post office in the main town of Ammanford. In addition to this there are a number of retail stores as well as large supermarkets to serve the site.

As can be seen on the plan, a number of these facilities are clustered within the town centre of Ammanford and within very close proximity to the site (less than a 5-10 minute walk) which lies on the opposite side of the main road. The site is therefore located in a sustainable location where it is well served by the local facilities on offer. There are also several bus routes that run through the town and connect to the surrounding settlements and also to Swansea and Carmarthen. The services offered are frequent which encourages their use and offers a viable alternative to private transport which increases the sustainability of the site.

The attached illustrative master plan at appendix 1 demonstrates that this individual site could be developed to provide a minimum of 16 dwellings yet subject to detailed design this could be in the region of 20 dwellings to provide an overall scheme which including GR3/11 would see the development of up to 30 new dwellings in a key growth area. This allocation in turn would also allow for the delivery of a number of affordable homes at this key growth area in accordance with SO3 of the LDP.

Whilst the proposed allocation site is greenfield, there are limited opportunities to deliver housing on previously developed land within Betws and such sites are already proposed to be allocated in the LDP. Accordingly, development at the site would accord with SO2. The site is also well integrated and seen within the context of the village of Betws, adjoining existing homes, and set against significant landscape belts which will serve to contain the proposed development and assimilate it into the overall landscape of the area.

The proposed allocation will also create a logical rounding off to this area of the settlement of Betws, defined by strong defensible boundaries, which along with existing and proposed landscaping will ensure that development is assimilated into the landscape. This will comply with the requirement of SO1.

The proposed allocation will have no material effect on the historic built environment, cultural heritage, biodiversity, or natural resources of the area, complying with objective SO4. The site is grazed agricultural land, with no protected species or features on or adjoining the site.

The site is already or capable of being readily serviced by the necessary infrastructure to deliver the proposed homes. Additionally through design it will be able to incorporate measures to reduce waste and encourage recycling, complying with SO5 of the LDP. Complying with objectives SO1-SO5 the site is sustainably located and will be designed to be responsive to climate change, is not a risk from flooding and will be designed to incorporate renewable energy/efficient measures.

Through its location the site is within walking distance of existing and potential future employment opportunities in accordance with SO11, this also serves to reduce the need to travel (SO2). Furthermore, additional housing at this site will serve to support the existing services and facilities within Betws and Ammanford in accordance with SO6-SO9.

The proposed allocation collectively with the existing site as promoted and benefiting from outline consent will comply with the strategic key objectives of the LDP and is therefore considered to be a realistic and appropriate proposal, which is founded on a robust and credible evidence base in order to meet the test of Soundness CE2.

Is the allocation appropriate?

The principle of allocating the site at Maesquarre Road for housing is appropriate as the site complies with the search sequence and allocation process provided in Planning Policy Wales. In accordance with paragraphs 4.7.2 and 9.2.9 of PPW, the site is:

- Sustainably located within a growth area to maintain and improve the vitality, attractiveness and viability of the area.
- Within walking and cycling distance of key services, facilities and employment opportunities within Betws and Ammanford, thereby minimising the need to travel particularly by private car. Please see the Design & Access Statement in GR3/11.
- Located such that it is already well served by existing and necessary infrastructure to support the proposed development.

- Located in a settlement and a location that will be resilient to climate change and any other impacts of climate change can be dealt with through design and other mitigation measures.
- Is not subject to any physical or environmental constraints on development including flood risk or ecology. (Appendix 3 - Welsh Government Development Advice Map & Appendix 6 – Ecology Statement).

Whilst noting the objective of PPW to utilise previously developed land in preference to greenfield sites (paragraph 4.7.2, 4.9.1 and 9.2.8) opportunities for the use of previously developed land in Betws are limited and where appropriate have already been identified in the LDP. However, the proposed development of the site does accord with a number of the key requirements of PPW, set out in paragraphs 4.7.2, 9.2.8 and 9.2.9 and as listed above in order to provide for an appropriate allocation when considered against the relevant policy requirements.

To conclude it is considered that the previous allocation of the frontage site and the promoted allocation under this representation meet the tests of PPW.

Should the whole site be allocated for housing?

The proposed 1.6 hectare allocation identified is considered to be well contained and would be comfortably absorbed within both the physical and naturally defensible boundaries of the site. Specifically, the site represents a slightly sloping area of agricultural land from north east to south west which is encompassed to the north and east of the site by wooded embankments and dense hedgerows which provides strong physical enclosures. To the southern and western boundaries of the site there exists stock fencing and hedgerows which have intermittent trees of various ages and type.

The site consists entirely of improved agricultural grassland which is currently grazed by sheep and horses. The site itself has a low level of variation in species assemblage given the agricultural improvements in the past, whereby there are no known areas of particular importance to nature conservation. The site boundaries in terms of the existing hedgerows are sought to be retained in any future development with the additional details in form of hedgerow and ecological surveys supplied in appendix 6.

In relation to surrounding residential form the site is primarily enclosed by residential blocks with the Charles Church site to the North and that of the street frontage properties which back onto the site from Foundary road to the South and Maesquarre Road to the West which form defensible boundary to the site.

The site would therefore allow for a natural and logical rounding off to the settlement boundary following an alignment with the extent of existing residential development and that of defensible natural boundaries. Furthermore, the larger site will provide the opportunity to deliver a wider range and mix of homes including greater numbers of affordable homes which again can be evidenced in appendix 1.

Has the alternative allocation sought been considered in respect of the Sustainability Appraisal/Strategic Environmental Assessment? Would the change be likely to have significant effects that require re-assessment? If so, has such an assessment been carried out? What was the outcome of the process?

The promoted site has already been subject to a Sustainability appraisal submitted as part of the initial LDP representations. The allocation would therefore not result in any material changes to this assessment process, given that no additional adverse impacts would arise.

Sustainability Appraisal:

	Key Issue Importance / Sensitivity	No. Issues	No. Prospective Opportunities
Score Summary Count	1 – LOW	4	22
	2 – MED	4	14
	3 - HIGH	0	8

Are there any significant obstacles to development of the site?

There are no significant obstacles or constraints to the delivery of development on the site given that the site is within the complete ownership of my client and consequently there are no third parties owners, easements or other title impediments that could prevent the delivery of this site. The site has no physical constraints or obstructions that would prevent its overall development. The site is grazed farmland and does not contain or adjoin:

- Protected trees or hedgerows;
- Watercourses or water bodies;
- Power lines or other utilities;
- Ecological features;
- Ground conditions or contamination; or
- Listed buildings or other protected structures.

The initial reason for discounting the site have been discussed and addressed above whereby In order to provide further assurances as to the deliverability of the site the following aspects have been commissioned alongside the approved outline application to demonstrate that there are no fundamental aspects that would prevent the site from coming forward:

- Highways Access (Appendix 2)
- Surface Water Drainage (Appendix 4)
- Ground Investigations (Appendix 5);
- Ecological Reports (Appendix 6);

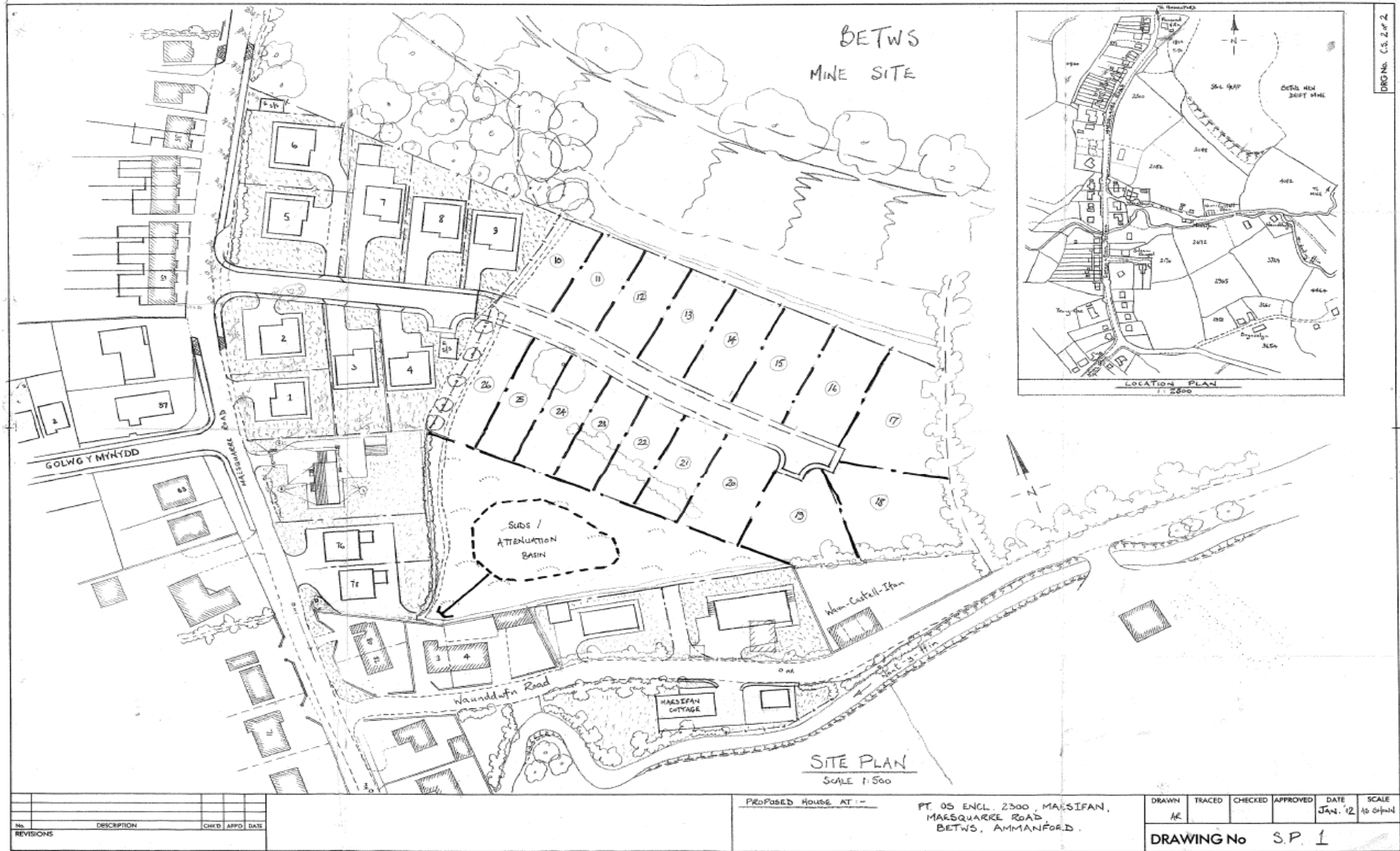
Key overviews and summaries of these additional reports as mentioned can be found in the appendices of the report, whereby full details can be provided on request.

What are the anticipated timescales for delivery?

The site as mentioned is under the complete ownership of my client together with that of the proposed access and is consequently available for immediate progression subject to confirmation of its allocation in the LDP.

The site would be seen as the next phase of development and would logically follow the completion of the initial site approved under planning reference E/26857. The remainder of the site could therefore commence as soon as 2016 with a completion date of 2018 based on a build rate of 10 dwellings per year. This would therefore provide a significant housing contribution within the initial stages of the plan and consequently bridge the gap for the initially anticipated shortfall of housing provisions elsewhere in the plan during the early stages.

Appendix 1 - Illustrative Master Plan

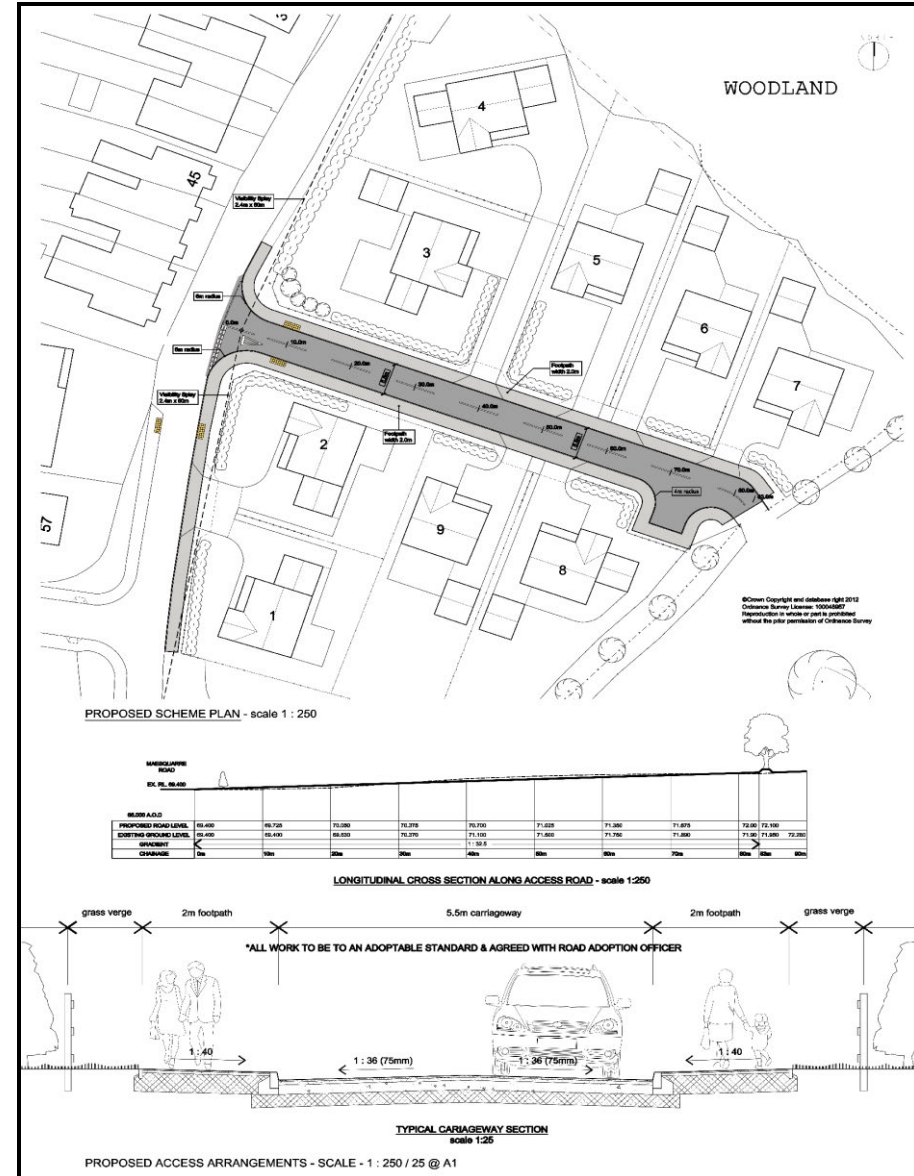


No.	DESCRIPTION	CHK'D	APPD	DATE
REVISIONS				

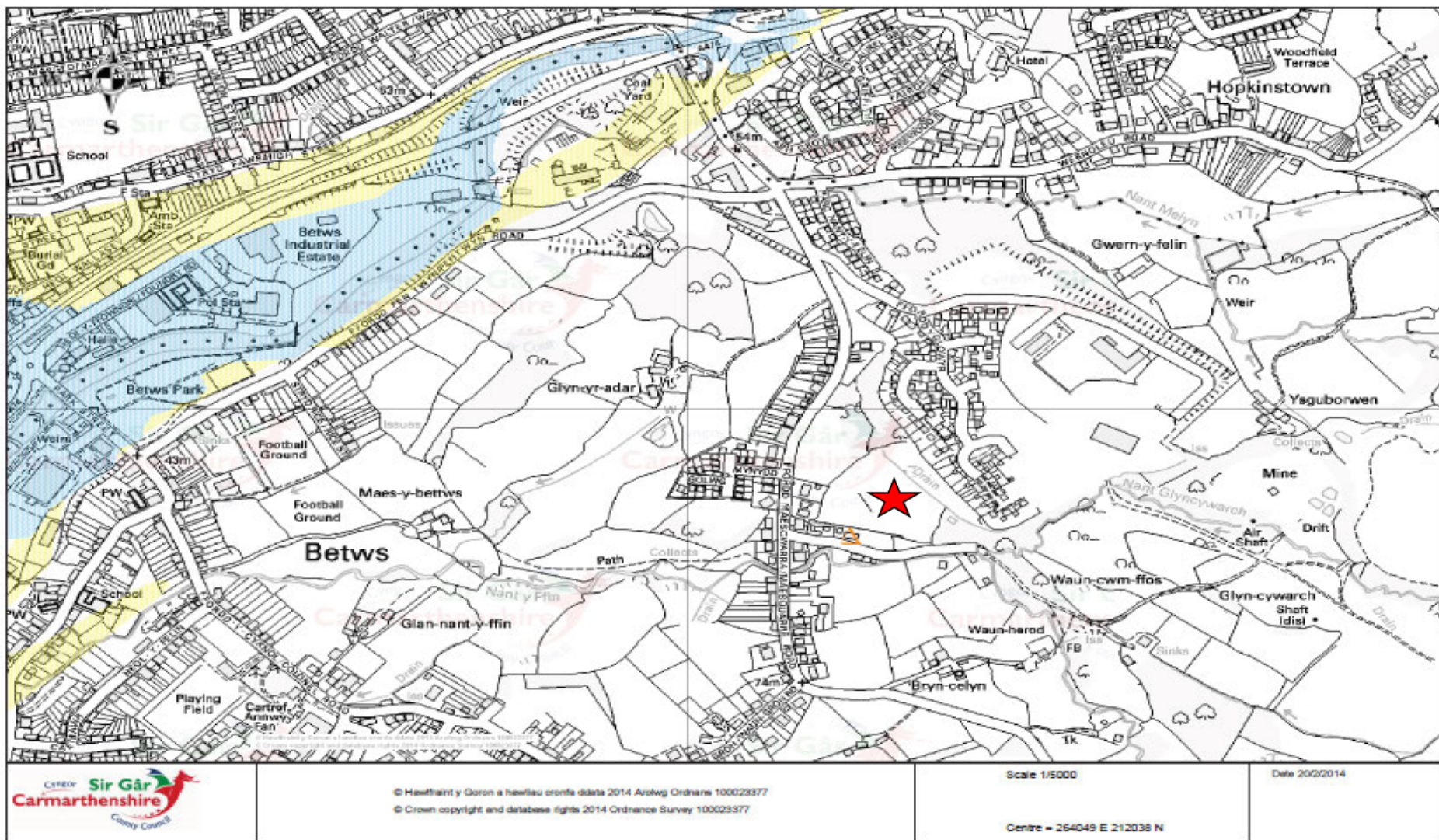
PROPOSED HOUSE AT :-
 PT. OS ENCL. 2300, MAESIFAN,
 MAESQUARKE ROAD,
 BETWS, AMMANFORD.


DRAWN	TRACED	CHECKED	APPROVED	DATE	SCALE
AK				JAN. 12	AS SHOWN
DRAWING No					S.P. 1

Appendix 2 – Access Arrangements

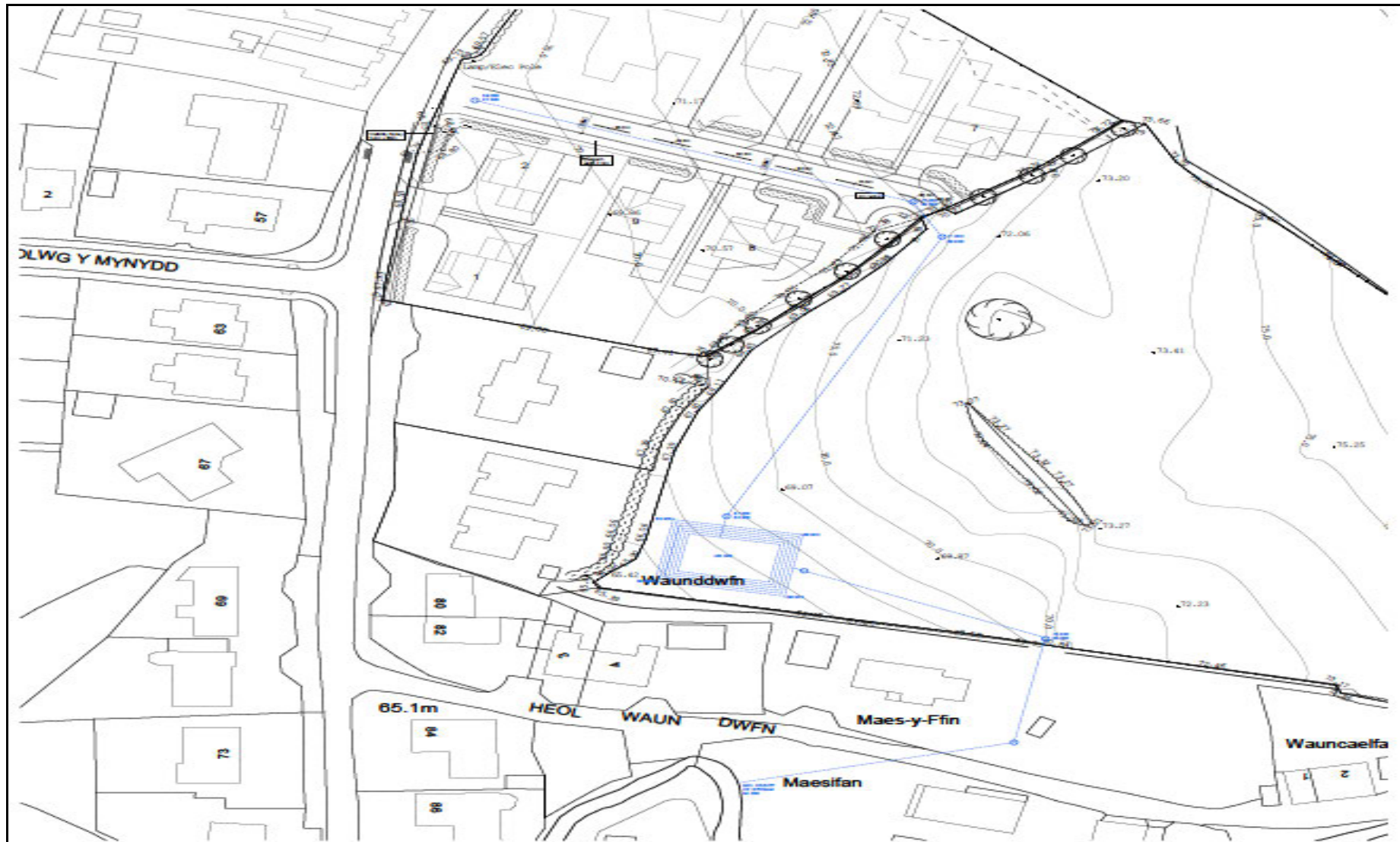


Appendix 3 - Development Advice Map Extract



 **Site Location**

Appendix 4 - Drainage Details Plan



Appendix 5 – Site Investigation Report Overview & Summary

Appendix 6 - Ecology Report