



REPRESENTATION STATEMENT

2nd DEPOSIT CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN
2018-2033

**LAND AT CARMARTHEN ROAD (A48)
FFOREST/HENDY, LLANELLI
CARMARTHENSHIRE, SA4 0TU**

**On behalf of
Celtic Properties and Developments Ltd.**

Our Ref: 2075.b/CLJ/23

Date: March 2023

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OBJECTION SITE: OVERVIEW

This objection submission has been prepared in respect of the 2nd Deposit Carmarthenshire Local Development Plan (LDP) and in order to demonstrate that the development of an area of land at Carmarthen Road, Fforest/Hendy, Llanelli, has the potential to contribute to the strategic aims and objectives of the replacement Carmarthenshire Local Development Plan.

This submission seeks an amendment to the specific alignment of the Carmarthenshire Local Development Plan development limits in the vicinity of Carmarthen Road (A48). This submission requests that the plan be revised to include this part of Fforest/Hendy within the development limits and thus provide for the future housing and community needs of the local area.

1.0 INTRODUCTION

- 1.0.1 JCR Planning Ltd. has been instructed by ‘Celtic Properties and Developments Ltd.’ (the landowner) to prepare a representation objection site submission in respect of the 2nd Deposit Carmarthenshire Local Development Plan (LDP) and an area of land at Carmarthen Road, Fforest/Hendy, Llanelli. The purpose of the submission is to seek the site’s allocation for residential development in the forthcoming replacement Carmarthenshire Local Development Plan (2018 – 2033).
- 1.0.2 This submission has been prepared in accordance with the Local Authority’s Revised Carmarthenshire Local Development Plan published guidance documents. The contents of this submission therefore address the relevant criteria within these documents, thus allowing a considered determination and evaluation.
- 1.0.3 Recognition has also been given to ensuring that this formal submission complies with the guidance and requirements of Planning Policy Wales and associated Technical Advice Notes, and other advisory guidelines issued by the Welsh Government.
- 1.0.4 This submission provides a comprehensive case for the allocation of the objection site for residential development purposes and should be considered in conjunction with the accompanying illustrative site layout plan. A red line identifies the spatial extent of the objection site in *Figure 1*.
- 1.0.5 In order to assist the Local Planning Authority in its deliberations, JCR Planning is prepared to supply any additional information that may be required and to arrange for a site inspection if deemed necessary.

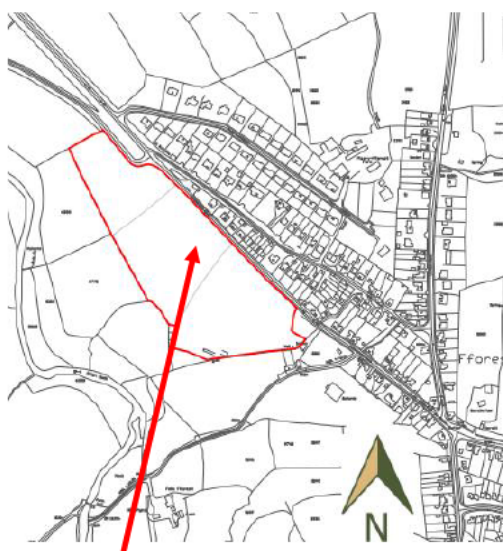


Fig. 1 – Objection site boundary in the context of Fforest

- 2.1.3 *Figure 4* provides an aerial image of the objection site and its surroundings, clearly demonstrating its ideal location adjacent to existing development, proximity to local services and facilities, and also the M4 strategic transport corridor.



Fig. 4 – Aerial view of objection site in relation to adjacent built form

- 2.1.4 The objection site is located to the north- west of the village centre and is directly related to the established urban area. The A48 (Carmarthen Road) forms the site's northern boundary, with the Heol y Plas and Plas y Fforest residential developments to its north. The site's eastern boundary is also partly formed by the adjoining residential curtilages of properties along Heol y Felin and agricultural land, which also lies to the south and east. The objection site comprises a natural and logical 'rounding off' opportunity within the spatial context of the settlement.
- 2.1.5 The general area is characterised by a mix of residential dwelling styles that take advantage of the road frontage aspect, with more recent housing schemes comprising in-depth developments. The objection site is ideally suited to a high quality development and readily lends itself to a more in depth scheme.
- 2.1.6 The relationship of the objection site to the immediately adjacent highway is shown in *Figures 5 and 6*. For the purposes of this submission, the accompanying illustrative layout (*Figure 9*) shows two accesses into the site from the immediately adjacent

Carmarthen Road. The road alignment at this stretch of Carmarthen Road provides good horizontal and vertical visibility in both directions, allowing the site to be served by safe and efficient accesses. The anticipated level of traffic generated by the additional residential development at this location will not create any highway capacity or safety problems. The Local Planning Authority itself is unlikely to raise any specific highway issues related to the development of this site, given the adequacy of potential visibility splays and existing highway capacity.



Fig. 5 – Visibility along Carmarthen Road towards the north-west



Fig. 6 – Visibility along Carmarthen Road towards the south-east

- 2.1.7 Topographically, the objection site displays a similar slope to that already developed to the north of Carmarthen Road. The site been extensively grazed and does not contain any landscape or other physical features of note. Any boundary trees will be protected during the development phase. Any trees that do need felling will be replaced by mitigating tree planting on a 'three trees for each one felled' basis.



Fig. 7 – General aerial view of objection site

- 2.1.8 It is evident that through its close physical relationship with the existing built form the development of the objection site represents an ideal 'rounding off' opportunity in this part of Fforest and will help reinforce the physical form of the settlement.
- 2.1.9 In summary therefore, there is no physical amenity feature within or adjacent to the objection site that will prevent its appropriate future and efficient development.
- 2.1.10 The provision of a range and choice of quality dwellings, which will be of benefit for the community, and will attract investment, which has to be a material consideration.

2.2 SETTLEMENT SUSTAINABILITY AND SITE SETTING WITHIN THE 2ND DEPOSIT LOCAL DEVELOPMENT PLAN

- 2.2.1 The settlement of Fforest is identified in within the 2nd Deposit LDP as a Tier 2 Service Centre under strategic policy SP3 'Sustainable Distribution – Settlement Framework'. The plan confirms that the majority of development will be directed towards the top tiers of the settlement framework hierarchy, and therefore, by definition, the site's sustainable development credentials are already formally acknowledged and confirmed.

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- 2.2.2 More specifically, in terms of accessibility, Fforest has regular bus services and is situated within a convenient distance of the large employment hub of Cross Hands (approx. 4.1 miles) and the main town of Llanelli (approx. 3.5 miles), which both provide a wide range of facilities and services. Fforest/Hendy is also within a convenient distance of nearby Pontarddulais which provides an extensive range of retail outlets and employment opportunities.
- 2.2.3 The objection site is ideally and centrally located in terms of walking distance from the centre of Fforest with its village shop/post office. Directly opposite the objection site is the ‘Bird in Hand’ public house/restaurant which provides an important community focus for this upper part of the Tier 2 Service Centre. Other services available in the lower part of Fforest/Hendy include a primary school, sports clubs and recreation facilities, retail outlets, employment opportunities and places of worship. In addition, neighbouring Pontarddulais provides healthcare, secondary education, rail services and a golf club.
- 2.2.4 The X13 and L7 bus services provide regular access to Llanelli, Swansea, Ammanford and Llandeilo. The public transport hubs of Llanelli and Swansea provide access to a wider network of bus and rail services, including the mainline London to Fishguard service. Fforest also benefits from proximity to the rail station in neighbouring Pontarddulais and its Heart of Wales rail service which links Swansea and Llanelli with Shrewsbury to the north. Fforest enjoys ease of access to the strategic highway network being in close proximity to the M4 motorway at Pont Abraham.
- 2.2.5 The aforementioned sustainable development credentials of Fforest should therefore be given full recognition and consideration when determining potential future growth options.
- 2.2.6 The fact that Fforest/Hendy is categorised as a Tier 2 Service Centre, with a designated ‘Existing Employment Area’, means the settlement must be afforded readily deliverable residential allocations, such as the objection site. Its designation as a residential allocation in the forthcoming LDP will assist in addressing this requirement and will provide a much-needed range and choice of dwellings within Fforest.
- 2.2.7 *Figure 8* contains an extract from the 2nd Deposit LDP’s Proposals Map for Fforest/Hendy which shows the spatial strategy proposed for this Tier 2 Service Centre. The Existing Employment Area is evident (purple shading) with the M4 strategic route running parallel to the west of the settlement. Several areas of recreation – outdoor sports areas, play areas, amenity greenspace – are available within the settlement.

2.2.8 In terms of planned residential growth, Fforest has been afforded three allocations (brown shading) in the 2nd Deposit Plan (SeC6/h4, SeC6/h3 & SeC6/h2) all of which have been either fully or partly constructed and therefore do not constitute a future contribution to the housing supply for the entire plan period.

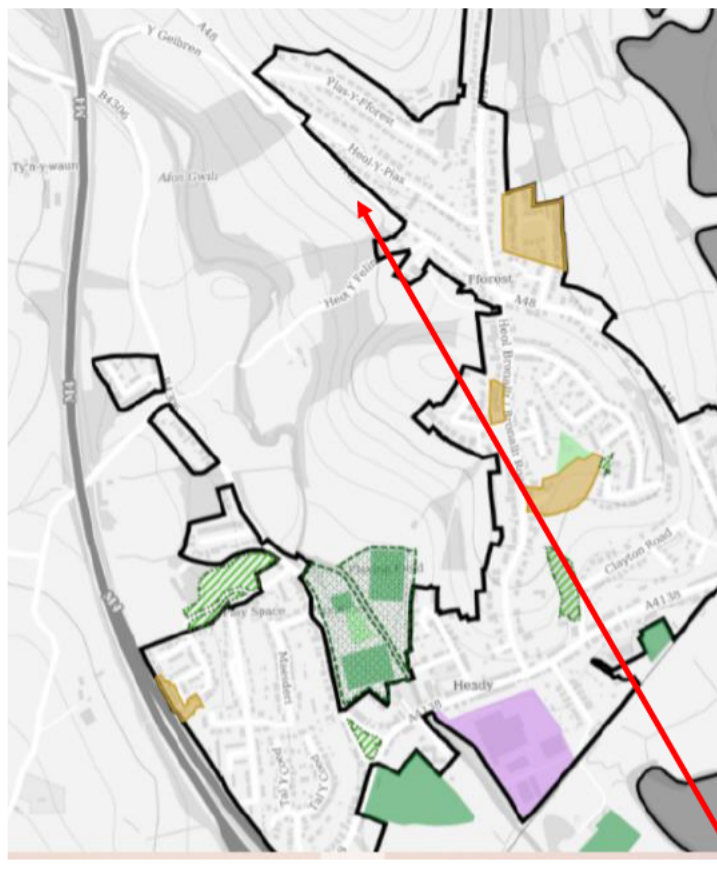


Fig. 8 – 2nd Deposit LDP extract showing planned growth in relation to the objection site

2.2.9 The limited potential for appropriate residential development within Fforest is of concern and any shortfall will need to be addressed. The lack of suitable land for housing will diminish the sustainability credentials of the overall settlement framework. In order to capitalise fully on the sustainability of this Tier 2 Service Centre, readily deliverable residential allocations are required – such as the objection site.

2.2.10 The designation of the objection site as a residential allocation in the forthcoming replacement LDP will assist in addressing any imbalance and will provide a much needed range and choice in terms of residential accommodation within Fforest. The objection site is readily available, capable of being delivered in the short term and can make an important contribution to future housing supply. It is also suited to a phased form of development and can accommodate an appropriate devised scheme.

3.0 NATIONAL PLANNING POLICY CONSIDERATIONS

- 3.0.1 In the preparation of a development plan, consideration must be given to national planning policy and guidance. At present, this takes the form of *Planning Policy Wales* (PPW) and a series of *Technical Advice Notes* (TANs) that deal with a range of topic areas.
- 3.0.2 With regards to residential development, the overarching requirement and principal guidance set by national policy is to provide sufficient quality housing to meet the anticipated needs of the community, including affordable dwellings. It is expected that sites should be free from planning, physical and ownership constraints, whilst also being economically feasible for development, in order to create sustainable communities. Sufficient sites need to be available for the appropriate development of a full range of dwelling types.
- 3.0.3 This formal Carmarthenshire Local Development Plan review should be aiming to assist in addressing Carmarthenshire County Council’s anticipated housing need which hitherto fell significantly below the previously required 5 year supply level. Securing correct levels of sustainable housing growth can only be achieved if truly deliverable allocations are identified. Such allocations should replace many of the failing and undeliverable sites that currently form part of the Authority’s housing and growth strategy for the county.
- 3.0.4 Dealing specifically with the objection site, it is evident that its inclusion within the replacement LDP would adhere to PPW’s requirements to ensure that housing sites are free from any planning, physical or ownership constraints. In addition, the objection site will also be economically viable in deliverability terms.
- 3.0.5 National planning policy provides authorities with more specific guidance in selecting sites for allocation for residential development and in terms of the objection site, it is considered that all relevant criteria are satisfied, including:-
- its sustainable location in terms of proximity to a range of community facilities, local services, public transport services and employment opportunities
 - the physical and social infrastructure of the settlement is capable of accommodating development at the site without detriment to any interest
 - it is not subject to any physical constraint that would prevent its delivery
 - its development for residential purposes would be compatible with existing adjoining land uses.
- 3.0.6 PPW promotes the notion of sustainable development as being central to all planning decisions in Wales. Sustainable development is defined as development that meets

the needs of the present without compromising the ability of future generations to meet their own needs.

- 3.0.7 Similarly, in terms of providing a framework for the provision of housing, a key policy objective is to provide greater choice in the type of housing available. This fundamental ambition manifests itself through the regulatory role of the planning system, which aims to ensure that new homes are provided in the right place and at the right time.
- 3.0.8 It has long been established that new housing developments are expected to be well-integrated with, and connected to, the existing pattern of settlements and should avoid creating a fragmented development pattern. Importantly there is also a recognition that new housing will continue to be required in order to sustain healthy economic activity and the viability of communities. Fforest can accommodate a modest level of development without damage to its character or to the surrounding countryside. New housing would help to sustain this settlement by providing additional critical mass for maintaining local services and facilities.
- 3.0.9 Essentially, directing new development and investment to those locations that already have a range of facilities and services, has the effect of minimising the distances between trip origin and destination, thus reducing the propensity for additional private car travel. The objection site is such a location, being situated in proximity to the village centre, close to a public transport corridor and within a convenient distance of a range of services and facilities.
- 3.0.10 The inclusion of the objection site within revised development limits for Fforest would reflect both national planning guidance, in terms of focusing development in sustainable locations, as well as the sustainable development policies promoted in the 2nd Deposit LDP strategic settlement framework. The objection site would help secure the development plan's strategic residential land supply and its inclusion would not create any amenity, highway or utility service provision issues.
- 3.0.11 In summary therefore, the allocation of the objection site would adhere to and support the objectives, principles and requirements of national planning policy.

4.0 THE PROPOSAL

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

4.1 DEVELOPMENT OVERVIEW

4.1.1 It is proposed that the objection site be allocated for residential development in the forthcoming replacement Carmarthenshire Local Development Plan. The accompanying illustrative site layout (reproduced at *Figure 9*) demonstrates that the site is capable of accommodating a significant number of dwellings in a deliverable, efficient and sustainable manner. The illustrative layout indicates an attractive in-depth form of development that fully reflects the existing built form and can readily be adapted to a phased scheme if deemed more appropriate.



Fig. 9 – Development option for objection site

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- 4.1.2 The objection site is clearly capable of accommodating a significant number of detached and semi-detached dwellings, with the standard proportion of affordable housing, in a scheme which reflects the existing form and density of residential development in the locality. It goes without saying that the objection site can readily accommodate a number of variations on the suggested layout.
- 4.1.3 The residential element of the scheme would comprise a high quality phased development and would draw on local Welsh vernacular architectural design elements, making every effort to be sustainable, both through the employment of local contractors, the use of local suppliers, and in the long term, through the provision of residential units within convenient walking distance of village services and facilities. The scheme's quality design will result in a significant gain for Fforest, not least in terms of well-being and placemaking.
- 4.1.4 With regards to access, it is proposed that the development be served by two individual means of access direct from Carmarthen Road, with appropriate footways and turning head provision. Visibility splays at each location can readily be achieved by virtue of the straight alignment of the highway.
- 4.1.5 Any existing trees and boundary treatments would be retained and managed as part of an overall landscaping strategy. This commitment would extend to all specified perimeter hedgerows, together with all mature trees.
- 4.1.6 The proposal acknowledges that an element of the proposed dwellings could be affordable in nature, or that contributions could be made to support affordable housing elsewhere in Fforest or indeed Carmarthenshire.
- 4.1.7 The illustrative layout clearly demonstrates that an appropriate residential scheme can be readily devised for the site without any environmental impact or causing harm to any third party interests.
- 4.1.8 It is considered that the objection site is highly sustainable and readily deliverable and that this 'rounding off' opportunity should be included within revised development limits for the Fforest/Hendy Tier 2 Service Centre.

4.2 INFRASTRUCTURE CONSIDERATIONS

- 4.2.1 The objection site's proposed development for residential purposes would be served by mains water, gas, public sewer (pumping station) and electricity connections, which are located within the adjoining highway.

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- 4.2.2 As regards any potential surface water, there is sufficient land available to introduce a comprehensive SuDS system at the lower portion of the site and could be supplemented by copious amounts of tree planting. The SUDS drainage scheme will be designed in accordance with all Welsh Government advice.
- 4.2.3 There are no areas of marshy grassland or water-logging evident within the site itself, and therefore at first inspection, it appears that the site benefits from efficient ground percolation of rainwater.
- 4.2.4 Soakaways would provide the most sustainable means of surface water disposal. If required, attenuation measures could be introduced on site to control surface water run-off during extreme storm events, which could also allow for additional capacity, making allowances for climate change. Such features can be hard or soft engineered in the form of small subterranean storage tanks or surface storage swales.
- 4.2.5 Foul water can be accommodated in the existing mains drainage system serving the remainder of the settlement.
- 4.2.6 The illustrative site layout confirms that the objection site can be developed in an efficient and effective manner, with all highway, amenity and utility service provisions satisfied. The layout is in-keeping with the character of the surrounding area and will provide a defined residential development opportunity to meet the expected needs of the community.

5.0 ENVIRONMENTAL CONSIDERATIONS

5.1 ECOLOGICAL ATTRIBUTES

- 5.1.1 The objection site has been assessed against a catalogue of available environmental data. DataMapWales details statutory and non-statutory national and local sites of ecological importance. The objection site does not contain any national or local nature conservation designation.
- 5.1.2 The areas of ancient semi-natural woodland highlighted in *Figure 10* (bright green shading) are sufficiently distant from the objection site so as not to be impacted in any way.

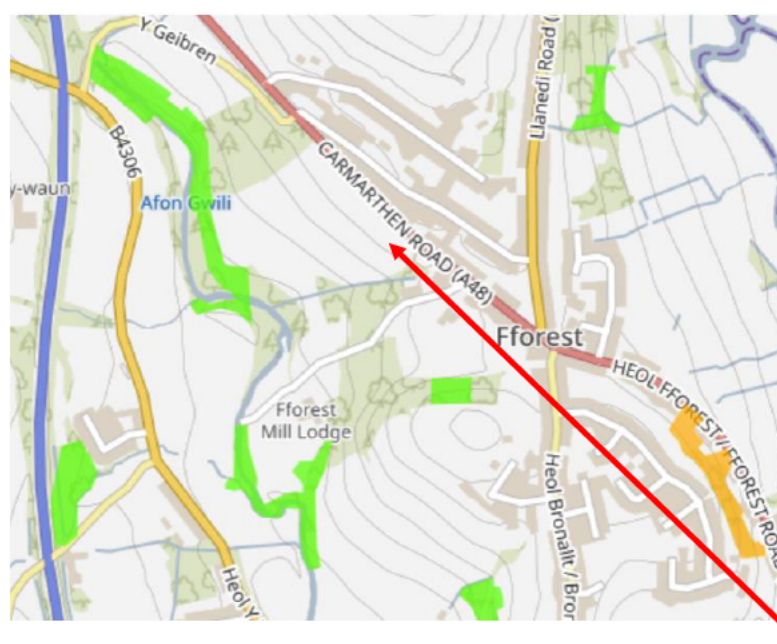


Fig. 10 – DataMapWales extract showing ancient woodland in relation to objection site

- 5.1.3 Any biodiversity assets that may be present at or adjoining the objection site have been given full consideration with regards to exploring its potential for residential development, including the proposed retention and management of existing boundary trees, woodland and hedgerow features, for further biodiversity gain.
- 5.1.4 The objection site is largely actively used and managed for the purposes of agriculture and therefore is subject to normal nutrient management practices.
- 5.1.5 It is considered that the development of the objection site will not be impeded by any statutory and non-statutory environmental designations.

5.2 HISTORIC ASSETS

- 5.2.1 The objection site has been assessed for any proximity to known and designated historic assets, using DataMapWales.
- 5.2.2 The objection site itself does not contain any listed buildings.
- 5.2.3 There are no scheduled ancient monuments (SAM) within or adjoining the site.
- 5.2.4 The objection site is not situated within or adjacent to any conservation area.
- 5.2.5 As a result, it is considered that the objection site's development would not have any detrimental impact on the setting or interest of any nearby historic asset.

5.3 ENVIRONMENTAL CONSTRAINTS

Potential for Risk from Flooding

- 5.3.1 The objection site has been assessed against DataMapWales and the Development Advice Maps (DAM), prepared by Natural Resources Wales (NRW).

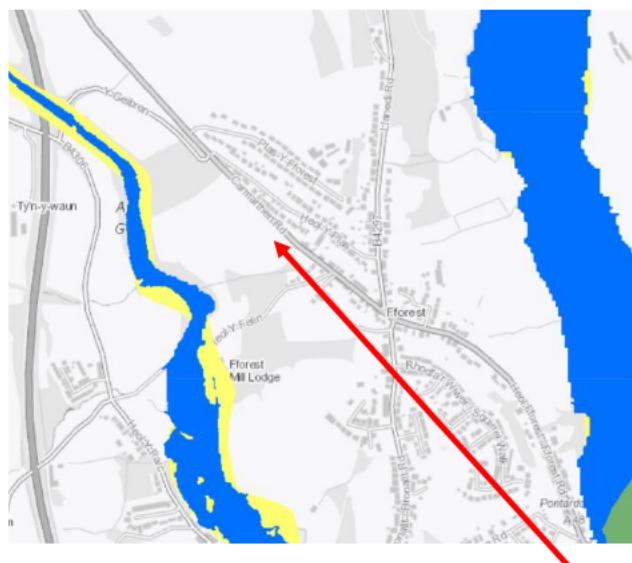


Fig. 11 – NRW DAM extract in relation to objection site

- 5.3.2 The above extract shows that no part of the objection site is situated within any designated flood zone, and thus the potential development of the site is not compromised by either fluvial or tidal flooding.



Fig. 12 – DataMapWales surface water flooding extract in relation to objection site

5.3.3 An examination has also been made of DataMapWales and NRW records relating to potential surface water flooding (*Figure 12*). The small area towards the south-eastern boundary of the objection site that is indicated as being potentially susceptible to surface water flooding are unlikely to cause any issues that cannot be readily addressed.

Potential for Ground Contamination and Coal Mining Activity

5.3.4 Significant areas of Carmarthenshire have historically been the subject of coal mining activity. The Coal Authority records have been examined to ascertain the presence of mine entries, adits or seams of shallow coal and mine workings.

5.3.5 The Coal Authority's records reveal that the objection site lies within a 'Surface Coal Resource Area' and the South Wales Coalfield 'Coal Mining Reporting Area' as shown in *Figure 13*.

5.3.6 The objection site has no known ground stability related constraints to its proposed development.

5.3.7 The objection site has no known ground contamination related constraints.

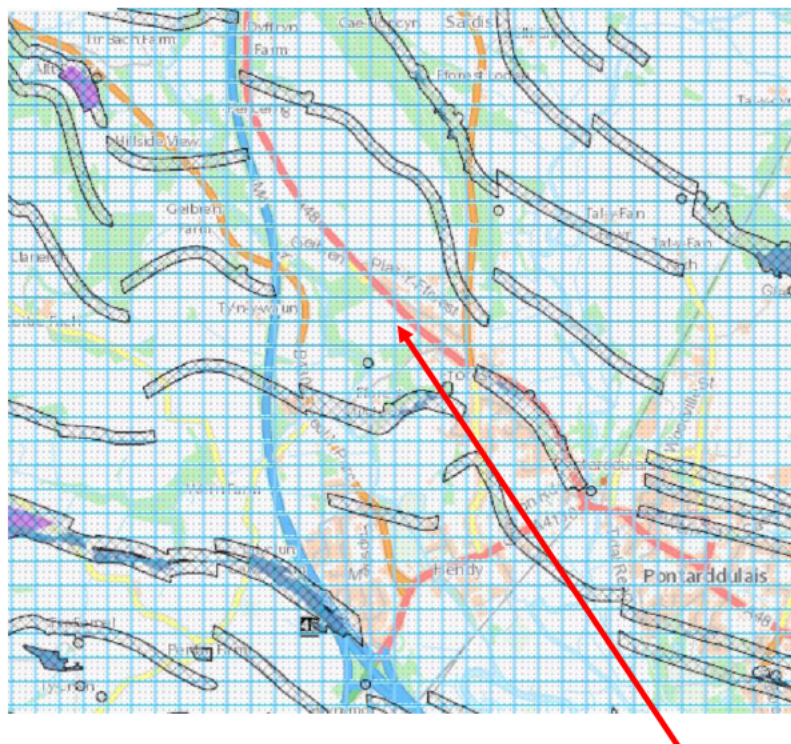


Fig. 13 – Coal Authority extract in relation to objection site

5.3.8 It is considered that the objection site's future development is unlikely to be impacted by coal mining activity.

6.0 VIABILITY

- 6.0.1 As part of the preparation of any development plan, it is vital to ensure that allocations are both viable and deliverable, in order to ensure that the development plan is sound and meets its own targets or objectives.
- 6.0.2 Detailed viability appraisals are presently difficult to prepare, given the various development permutations available, the absence of full engineering details and costings, and the difficulties of trying to undertake such appraisals at a strategic or in-principle level. It is anticipated that given average house prices in the Fforest area, there will be no difficulty in achieving a positive gross development value for this site. It should be noted that more detailed analysis can be provided at the appropriate stage in the LDP process.

6.1 VIABILITY APPRAISAL

- 6.1.1 The viability of delivering a residential scheme on the objection site is based very much on its greenfield status and adopts values and costings previously accepted by the Local Authority, including:-

Costs

- Dwelling construction costs are based on an absolute minimum of £1,500 per metre.
- Adoptable road construction costs are based on standard costings.
- Connections for all utilities, including water, foul water and electricity.
- Developer's profit is based on minimum RICS guidelines (15%).
- Professional fees, include planning application fee, associated professional fees, estate agency fees (1%) and LABC Warranty fee.

Sales Values

- Sale prices are based on the Local Planning Authority's 'Affordable Housing' Supplementary Planning Guidance, market research and Welsh Government 'Acceptable Cost Guidance' figures, where relevant.
- 6.1.2 It is considered that in principle, the development of the objection site would be financially viable and also capable of making a financial contribution towards the provision of affordable housing within the locality.

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- 6.1.3 The residual land value is likely to be considered reasonable, bearing in mind this will exclude any developer's build profit.

6.2 DELIVERABILITY

- 6.2.1 In terms of deliverability, it should be noted that the objection site is financially and physically viable, with no environmental, geo-physical or technical constraints prohibiting immediate development. Furthermore, there are no ownership or third-party interests preventing the site's delivery.
- 6.2.2 With a developer secured, the development target is established to be within five years from adoption of the replacement Local Development Plan.

6.3 APPRAISAL

- 6.3.1 The justification for the inclusion of the objection site within the development limits for Fforest is derived from national planning policy, as well as the physical attributes of the site itself. The development of the objection site would satisfy sustainability objectives and provide considerable socio-economic advantages for the settlement, not least in terms of providing a guaranteed housing development for the benefit of the local community.
- 6.3.2 The objection site is located within the settlement of Fforest/Hendy, which is defined as a Tier 2 Service Centre in the 2nd Deposit LDP and is therefore regarded as a highly sustainable settlement. The broad principle of residential development is acceptable, given its direct relationship and close proximity to the existing built form.
- 6.3.3 This submission proposes a mixed development of detached and semi-detached properties, with the standard proportion of affordable housing. The general area is an attractive location for private individuals and small-volume builders due to the proximity of local services and the availability of development land at reasonable cost.
- 6.3.4 Elsewhere, opportunities for new housing land within Fforest are limited with the majority of other allocations having been or being constructed. The objection site is within defensible boundaries, immediately adjacent to the built form and within a convenient walking distance of nearby services and facilities.
- 6.3.5 By way of summary, the objection site at Carmarthen Road, Fforest, is entirely suitable for residential development for the following reasons:-

Compatibility with adjacent land uses

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

Potential community benefits including affordable housing

The element of affordable housing will be beneficial in terms of providing much needed elderly persons accommodation at a subsidised rent.

Site availability and deliverability during the Local Development Plan period

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

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

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

Accessibility to public transport

The objection site is located adjacent to a main public transport corridor and Fforest/Hendy has a rail station.

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

There are no flood risk issues.

Impact upon biodiversity, protected sites and species

A site inspection will confirm that the majority of the objection site comprises low quality agricultural land that has been extensively grazed. No significant bio-diversity interest could be established and no protected species will be affected by its development.

Landscape impact

There will be no landscape impact from the objection site's development.

Contaminated land

There are no known land contamination issues.

Impact upon listed buildings, registered historic parks or landscape parks

There are no listed buildings within or in close proximity to the objection site.

Impact upon scheduled monuments

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

Impact upon conservation areas

The objection site does not form part of any conservation area.

Impact upon other environmental designations

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

6.3.6 In addition, the retention of any important trees and hedgerows will minimise any potential visual impact.

6.3.7 The required proportion of affordable housing will be beneficial in terms of providing much needed accommodation within the settlement.

6.3.8 By way of emphasis, the objection site:-

- will help sustain the community by providing dwellings in a location that reinforces the settlement pattern;
- is of moderate size and is well-related to existing residential development;
- would not be tantamount to development in the open countryside, as it is partly bounded by existing dwellings;
- would not result in the loss of any important amenity feature or represent an unacceptable intrusion into the landscape;
- would fully comply with established planning policies that direct development to sustainable locations in terms of proximity to services, facilities, public transport routes and employment opportunities;
- will be contained within existing defensible boundaries and will not give rise to any harmful precedent for further residential development;
- represents an efficient and sustainable development opportunity;
- the site's favourable physical relationship with adjacent residential properties will enable development to be undertaken without the potential problems of overlooking, etc.;
- would not give rise to any recognised highway or utility service provision objections; but instead,
- would contribute to the local community's well-being by providing homes at a sustainable location within the context of Fforest.

7.0 CONCLUSION

- 7.0.1 This submission has been prepared in order to demonstrate that the development of an area of land at Carmarthen Road, Fforest, has the potential to contribute to the strategic aims and objectives of the replacement Carmarthenshire Local Development Plan (2018 – 2033).
- 7.0.2 The inclusion of the objection site within the development limits for Fforest would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type.
- 7.0.3 The development of the objection site would be in keeping and in character with the existing pattern of development and would help reinforce the built form of the settlement by utilising this ‘rounding off’ opportunity.
- 7.0.4 The objection site represents a sustainable and deliverable opportunity to provide new housing within this designated Tier 2 Service Centre. With the site capable of being readily served by utilities, together with an efficient means of access from the adjoining public highway, there are no barriers to its delivery within the early stages of the forthcoming plan.
- 7.0.5 The objection site also lies in close proximity to the services and facilities of the village centre, being directly opposite the ‘Bird in Hand’ public house/restaurant, and benefits from regular public transport links with nearby settlements.
- 7.0.6 The development of the objection site will ensure a deliverable source of future housing for this sustainable settlement. It is suggested that the Local Authority closely scrutinises those sites allocated in the 2nd Deposit LDP in terms of their suitability and deliverability. National planning policy advises that, in those instances where deliverability is uncertain, such sites should not form part of the replacement Local Development Plan.
- 7.0.7 The objection site is located immediately adjacent to existing residential properties, and its development:-
- would be acceptable to both the form and character of the locality;
 - would not be detrimental to the amenity of adjacent properties;
 - would satisfy recognised housing and sustainability objectives;
 - would not have a detrimental impact on the landscape or nature conservation interests.

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- 7.0.8 The objection site has limited amenity value and is a sustainable location. Its development would satisfy all other development considerations, such as access, parking, availability of utility services, landscaping, etc.
- 7.0.9 With the objection site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery, if allocated, is assured. The site represents a sustainable opportunity for future residential development.
- 7.0.10 For the reasons set out above, it is respectfully requested that favourable consideration is given to the inclusion of the objection site within the LDP's development limits for Fforest, thereby allowing the site to come forward during the plan period up to 2033.