



## **REPRESENTATION STATEMENT**

### **2<sup>nd</sup> DEPOSIT CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN** **2018-2033**

**LAND ADJACENT TO MEMORIAL HALL  
PONTARGOTHI  
CARMARTHENSHIRE, SA32 7LZ**

**On behalf of**

**Messrs. D. Sims and P. Comwell**

**Our Ref:** 0649.b/CLJ/23

**Date:** March 2023

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## **OBJECTION SITE: OVERVIEW**

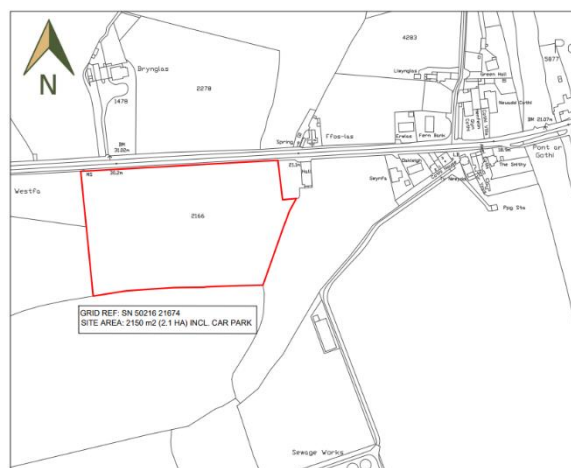
*This objection submission has been prepared in respect of the 2<sup>nd</sup> Deposit Carmarthenshire Local Development Plan (LDP) and in order to demonstrate that the development of an area of land adjacent to the Memorial Hall, Pontargothi, has the potential to contribute to the strategic aims and 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 the Memorial Hall and requests that the plan be revised to include this part of Pontargothi within the development limits and thus provide for the future housing and community needs of the local area.*

*The submission also includes a proposal to provide land to allow for the extension of the village hall car park which is often over-subscribed at events. The option to provide an alternative and safer access onto the A40 trunk road also forms part of this submissions.*

## 1.0 INTRODUCTION

- 1.0.1 JCR Planning Ltd. has been instructed by Messrs. Sims and Cromwell (the landowners) to prepare a representation objection site submission in respect of the 2<sup>nd</sup> Deposit Carmarthenshire Local Development Plan (LDP) and an area of land adjacent to the Memorial Hall, Pontargothi. The purpose of the submission is to seek the site's allocation for residential development and community use 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* which includes land for the proposed car park extension.
- 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 Pontargothi*



- 2.1.3 *Figure 4* provides an aerial image of the objection site and its surroundings, clearly demonstrating its ideal location adjacent to the communal hub of the village, the Memorial Hall, and its proximity to the village centre.



*Fig. 4 – Aerial view of objection site in relation to Pontargothi*

- 2.1.4 The objection site is located to the west of the village centre. Its northern boundary is formed by the immediately adjacent A40 trunk road, whilst to the east is the village hall's car park. The western and southern boundaries are formed by adjoining agricultural land.



*Fig. 4 – Aerial view of more recent residential schemes in Pontargothi*



- 2.1.5 The general area is characterised by a mix of residential dwelling styles, with some taking advantage of the road frontage aspect, but more recent housing schemes adopting an in-depth form of development. The objection site lends itself to a more in-depth scheme in a similar vein to those approved on the eastern side of the village.
- 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 10*) shows an access into the site direct from the immediately adjacent A40 trunk road. The proposed access is located at approximately the same point as an existing agricultural access.



*Fig. 5 – Visibility along A40 towards the east*

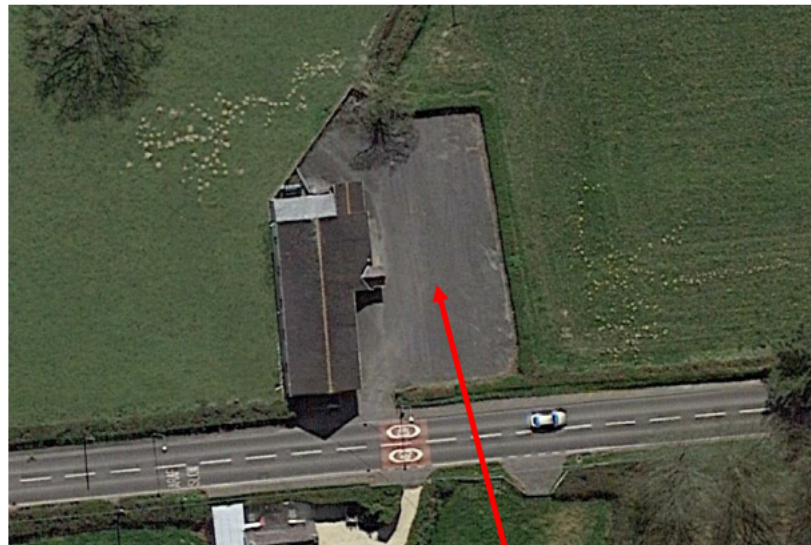


*Fig. 6 – Visibility along A40 towards the west*

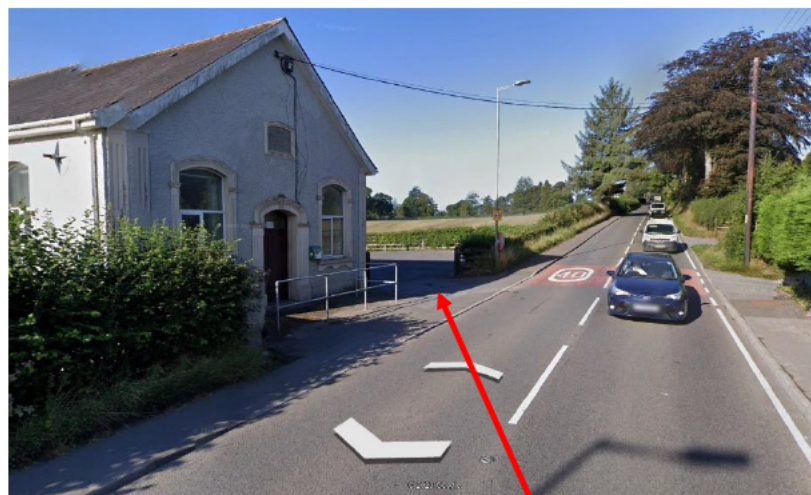
- 2.1.7 The road alignment at this point provides good horizontal and vertical visibility in both directions, allowing the site to be served by a safe and efficient access. The anticipated

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.

- 2.1.8 Part of the objection site is being offered for an extension to the existing Memorial Hall car park. The village hall is a popular venue for the frequent community events and gatherings that are held for both residents of Pontargothi itself and its environs. The current car park is limited in size and can become very congested when events are held at the hall, particularly the village shows, which generate high volumes of traffic.



*Fig. 7 – Aerial view of current car park's limited size*



*Fig. 8 – Google Earth image of current restricted access to Memorial Hall car park*



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- 2.1.9 *Figure 8* shows the current access arrangement at the village hall which is clearly restricted and can give rise to highway safety issues. Although the speed limit at this point is currently 40 mph, traffic speeds often exceed this limit. The Memorial Hall's access is at a point where the A40 becomes constricted through the village, where traffic has to negotiate the bridge that crosses the Afon Cothi. There are also side junctions in the vicinity together with domestic driveways. There is also the traffic generated by the village pubs/restaurants and Chapel, all within a short distance, and all accessing the A40 at different points.
- 2.1.10 The A40 is a key strategic highway route from east to west and is subject to high traffic volumes and heavy goods vehicle use. There is of course local traffic usage, including agricultural, i.e. tractors, trailers, etc., in addition to the high volume of through traffic.
- 2.1.11 The objection site proposal includes the offer of an area of land and provision of an extension to the current Memorial Hall car park to alleviate parking space shortage. Increasing the size of the parking area would also assist in manoeuvrability within the car park, making access and egress to the A40 safer.
- 2.1.12 It is also suggested as part of the objection site proposal that an alternative and safer access onto the A40 is provided as part of the scheme to serve the village hall which would be of great benefit to the local community and highway safety in general. This access would be further away from the congested part of Pontargothi and with much improved visibility.
- 2.1.13 Topographically, the objection site is gently sloping, measures approximately 2.1 ha and has been extensively grazed. The site does not contain any landscape or other physical features of note. Any boundary trees will be protected during the development phase.
- 2.1.14 The development limits in this area reflect the legacy of the incremental development that has occurred in the locality, with dwellings being constructed along the highways. It is evident that through its close physical relationship to the village centre, the development of the objection site will help prevent further ribbon development.
- 2.1.15 It is worth noting that the site has previously been considered appropriate for its allocation for residential development by earlier local authorities and was related to a proposed Pontargothi by-pass, which was an identified scheme in the 1980s. It is understood that further information in respect of previous allocations is being addressed by a parallel submission.

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2.1.16 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.

## **2.2 SETTLEMENT SUSTAINABILITY AND SITE SETTING WITHIN THE 2<sup>ND</sup> DEPOSIT LOCAL DEVELOPMENT PLAN**

2.2.1 The settlement of Pontargothi is identified in within the 2<sup>nd</sup> Deposit LDP as a Tier 3 Sustainable Village, under strategic policy SP3 ‘Sustainable Distribution – Settlement Framework’. Therefore, by definition, the site’s sustainable development credentials are already formally acknowledged and confirmed.

2.2.2 More specifically, in terms of accessibility, Pontargothi has regular bus services and is situated within a convenient distance of the larger market towns of Carmarthen and Llandeilo, which provide a wide range of facilities and services, including retail outlets, secondary and tertiary education, healthcare, libraries, cinema, sport/recreation, and employment opportunities.

2.2.3 The objection site is conveniently located in terms of walking distance from the centre of Pontargothi and proximity to its public houses/restaurants and Chapel. A medical surgery, primary school and public house are also available in the village of Nantgaredig, just 0.5 miles to the west along the A40.

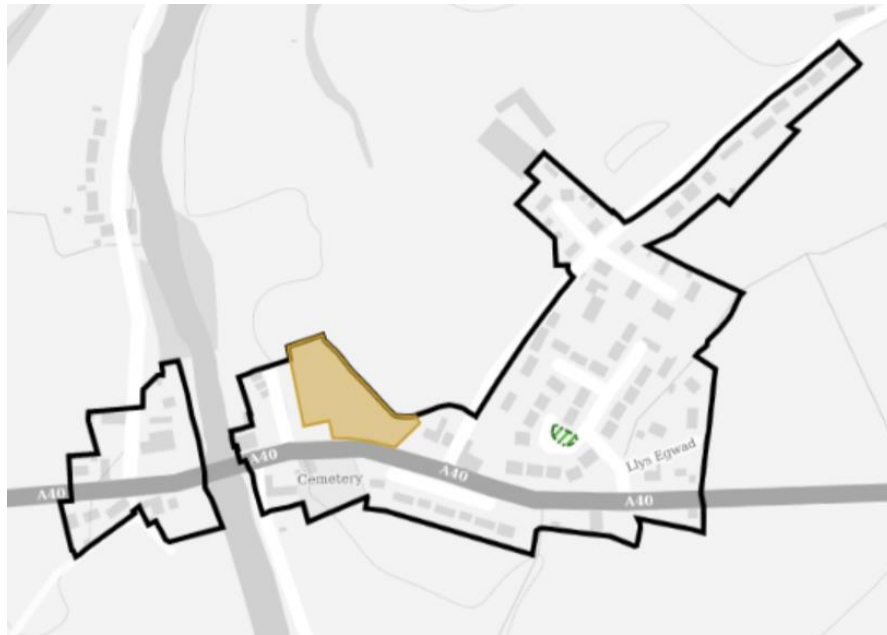
2.2.4 The 280 and 281 Llandovery to Carmarthen bus services provide regular access to from Pontargothi to both towns, linking with Llandeilo and a number of other settlements. The public transport hub of Carmarthen provides access to a wider network of bus services, including Swansea, Llanelli and Haverfordwest. Pontargothi also benefits from a station on the Heart of Wales rail line which provides links to Llanelli and Swansea and the main London to Fishguard rail service. Pontargothi enjoys ease of access to the strategic highway network being in that it straddles the main A40 trunk road linking West Wales with Brecon, Abergavenny and further afield.

2.2.5 The strong sustainable development credentials of Pontargothi should therefore be given full recognition and consideration when determining potential future growth options.

2.2.6 The fact that Pontargothi is recognised as a Tier 3 Sustainable Village within the 2<sup>nd</sup> Deposit LDP means that the settlement must be afforded readily deliverable residential allocations, such as the objection site. The designation of the objection site as a

residential allocation in the forthcoming LDP will assist in addressing this requirement and will provide a much-needed range and choice in terms of dwellings within Pontargothi.

- 2.2.7 *Figure 9 contains an extract from the 2<sup>nd</sup> Deposit LDP's Proposals Map for Pontargothi which shows the spatial strategy proposed for the settlement.*



*Fig. 9 – 2nd Deposit LDP extract showing planned growth in Pontargothi*

- 2.2.8 In terms of planned residential growth, Pontargothi has only been afforded one housing allocation (brown shading) in the 2<sup>nd</sup> Deposit Plan (SuV18/h1). This allocation is however longstanding and is yet to be delivered. In addition, it is understood that the site's deliverability may be affected by viability issues. In order to capitalise fully on the sustainability of this Tier 3 settlement, readily deliverable residential allocations are required – such as the objection site, which has no issues in terms of its short term development. The objection site complies with Planning Policy Wales' requirements in that it is free from any planning, physical or ownership constraints preventing its development.
- 2.2.9 The limited potential for appropriate and deliverable residential development within Pontargothi is of concern and any shortfall needs to be addressed. The net result is that the sustainability credentials of the LDP's approach comes into question as a result of the lack of deliverable housing allocations.

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- 2.2.10 An important material consideration in the assessment of the merits of the objection site is that its inclusion will result in the provision of a much-needed extension to communal car parking provision at the village hall, together with an improved and safer alternative access onto the A40 trunk road.
- 2.2.11 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 Pontargothi.



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### 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 and public transport services
  - 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 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

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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. Pontargothi 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, adjacent to a public transport corridor and within a convenient walking distance of a range of services and facilities.
- 3.0.10 The inclusion of the objection site within revised development limits for Pontargothi would reflect both national planning guidance, in terms of focusing development in sustainable locations, as well as the sustainable development policies promoted in the 2<sup>nd</sup> 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 mainly residential development in the forthcoming replacement Carmarthenshire Local Development Plan. The accompanying illustrative site layout (reproduced at *Figure 10*) demonstrates that the site is capable of accommodating an appropriate number of dwellings in a deliverable, efficient and sustainable manner. The illustrative layout indicates an attractive in-depth form of development.



Fig. 10 – Development option for objection site

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- 4.1.2 The objection site is clearly capable of accommodating the proposed 30 no. mixed style dwellings, with the standard proportion of affordable housing, in a scheme which reflects the existing form and density of residential development in the village.
- 4.1.3 Although the illustrative scheme suggests an in depth form of development, it goes without saying that the objection site can readily accommodate a number of variations on the suggested layout.
- 4.1.4 The residential element of the scheme would comprise a high quality 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.
- 4.1.5 It must be emphasised that the proposed scheme does not seek residential development on the entire site but incorporates a significant community benefit. The proposer is keen to offer an area of land that would facilitate the provision of an extended car parking area for the village hall. This would provide more parking spaces and also improve manoeuvrability within the car park itself. Importantly, an alternative and safer access to the A40 for Memorial Hall visitors is incorporated, which will improve highways safety along this stretch of this strategic trunk road.
- 4.1.6 This voluntary contribution of a car park and access provision would result in substantial community benefit and significant gain for Pontargothi.
- 4.1.7 With regards to access, it is proposed that the development be served by its own individual means of access direct from the A40, at the approximate point where there is an existing agricultural access, with appropriate footway and turning head provision. Visibility splays can readily be achieved by virtue of the straight alignment of the highway.
- 4.1.18 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.
- 4.1.19 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 Pontargothi or indeed Carmarthenshire.



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4.1.20 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.

4.1.14 It is considered that the objection site is both more sustainable and deliverable than the other site allocated for residential development within Pontargothi. The inclusion of the objection site within revised development limits should be fully supported.

## **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 and electricity connections, which are located within the adjoining highway.

4.2.2 As regards any potential surface water, roadside gullies and drainage will aid discharge run-off from the carriageway. The proposed access road to the site could connect to the existing highways drainage as part of an adoptable estate road system. Alternatively, the incorporation of a SUDS drainage scheme, in accordance with forthcoming Welsh Government advice, is readily achievable and feasible.

4.2.3 There are no areas of marshy grassland or water-logging evident, and therefore at first inspection, it appears that the site benefits from efficient ground percolation of rainwater.

4.2.4 Soakaways would provide the most sustainable means of surface water disposal. If required, attenuation measures could be introduced on site to control surface water run-off during extreme storm events, which could also allow for additional capacity, making allowances for climate change. Such features can be hard or soft engineered in the form of small subterranean storage tanks or surface storage ponds.

4.2.5 Foul water can be accommodated in the existing mains drainage system serving 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 development opportunity for the community.

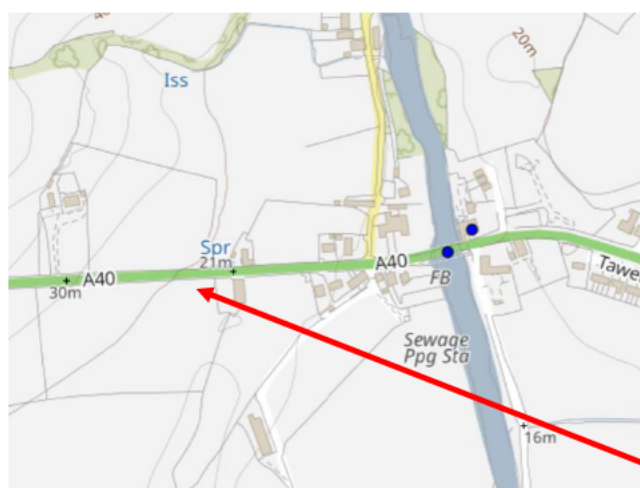
## 5.0 ENVIRONMENTAL CONSIDERATIONS

### 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. There are also no areas of established woodland in the locality.
- 5.1.2 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 enhancement.
- 5.1.3 The objection site is largely actively used and managed for the purposes of agriculture and therefore is subject to normal nutrient management practices.
- 5.1.4 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. An extract showing the listed buildings within Pontargothi is embedded at *Figure 10*.



*Fig. 10 – DataMapWales extract showing listed buildings in relation to objection site*

- 5.2.2 The objection site itself does not contain any listed buildings and neither are any in close proximity. The closest is the Grade II listed road bridge, ‘Pont-ar-Gothi’, some 0.14 miles to the east. The other listed building is the Grade II ‘Creselly Arms’ situated immediately to the east of the Afon Cothi. Neither of these listed buildings or their settings will be affected by the development of the objection site, it being sufficiently distant from both historic assets.
- 5.2.3 There are no scheduled ancient monuments (SAM) within or adjoining the site. Neither does the objection site impact any conservation areas.
- 5.2.4 As a result, 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*). No part of the objection site is affected by potential surface water flooding.

#### **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 outside the South Wales Coalfield area and is not affected by any past or present coal mining activity.
- 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.



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## 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 Pontargothi 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 firstly noted that as shown, 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 Pontargothi 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 Pontargothi, which is defined as a Tier 3 Sustainable Village in the 2<sup>nd</sup> Deposit LDP and is therefore regarded as a sustainable settlement. The broad principle of residential development is therefore acceptable, given its close relationship and proximity to the communal hub of the village.
- 6.3.3 This submission proposes a mixed dwelling type development of 30 no. high quality units, with the standard proportion of affordable housing.
- 6.3.4 The gross development density is considered to be in keeping with the settlement as a whole.
- 6.3.5 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.

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- 6.3.6 The objection site is gently sloping, is within defensible boundaries, and is a convenient walking distance of nearby services and facilities. It also benefits from direct access to the A40 trunk road.
- 6.3.7 The fundamental principles of development, as set out within this submission, will enable developers to produce an attractive scheme with the provision of an important community benefit, namely, an extension to the village hall's existing car park. Also offered as part of the scheme, is the provision of an alternative access to the car park thereby improving overall highway safety.
- 6.3.8 The objection site reflects the more recent built form of Pontargothi and is strategically situated to take full advantage of the adjacent key public transport route (A40). Elsewhere, opportunities for new housing land within Pontargothi are limited, with there only being one longstanding allocation in the village, which as yet continues to be undelivered.
- 6.3.9 By way of summary, the objection site adjacent to the Memorial Hall, Pontargothi, is entirely suitable for residential development for the following reasons:-

*Compatibility with adjacent land uses*

The objection site is situated in proximity to the communal hub of the village and the scheme incorporates an alternative and safer access for visitors than that currently utilised.

*Potential community benefits including affordable housing*

The element of affordable housing will be beneficial in terms of providing much needed accommodation at a subsidised rent. The proposed extension to the Memorial Hall car park will be of significant benefit to the community.

*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 the A40, a main public transport corridor.

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*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 two listed buildings within Pontargothi but there is sufficient intervening distance in each instance so as not to impact upon their setting.

*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 a conservation area.

*Impact upon other environmental designations*

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

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

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

6.3.12 By way of emphasis, the objection site:-

- will help sustain the community by providing dwellings in a location that reinforces the settlement pattern;
- will provide a community car park facility;
- is of moderate size and reflects other residential development in the village;
- would not be tantamount to development in the open countryside, as it adjoins the communal hub of the village;



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- 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 and public transport routes;
  - will be contained within existing defensible boundaries and will not give rise to any harmful precedent for further residential development;
  - represents an efficient and sustainable development opportunity;
  - the site's relationship with existing 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 a choice of dwellings within this Tier 3 Sustainable Village.

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## 7.0 CONCLUSION

- 7.0.1 This submission has been prepared in order to demonstrate that the development of an area of land adjacent to the Memorial Hall, Pontargothi, 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 Pontargothi 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 inclusion of public car parking facilities and an alternative, safer access onto the A40 trunk road are material considerations in respect of this representation.
- 7.0.4 The development of the objection site would be in keeping and in character with the existing pattern of development and would reflect the more recent built form of the settlement.
- 7.0.5 The objection site represents a sustainable and deliverable opportunity to provide new housing within this designated Tier 3 Sustainable Village. 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.
- 7.0.6 The objection site also lies in close proximity to the services and facilities of the village centre and benefits from regular public transport links with nearby settlements.
- 7.0.7 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 2<sup>nd</sup> 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.
- 7.0.8 The objection site is located adjacent to the communal hub of the village, and its development:-
- would be acceptable to both the form and character of the locality;
  - would not be detrimental to the amenity of residential properties;
  - would satisfy recognised housing and sustainability objectives;

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

7.0.9 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.

7.0.10 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.

7.0.11 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 Pontargothi, thereby allowing the site to come forward during the plan period up to 2033.