

Date: 11 April 2023

Our ref: CCC_LDP2018-2033_L1

Brynglas,

Cwmffrwd,

Carmarthen.

SA31 2LZ

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

Dear Sir / Madam,

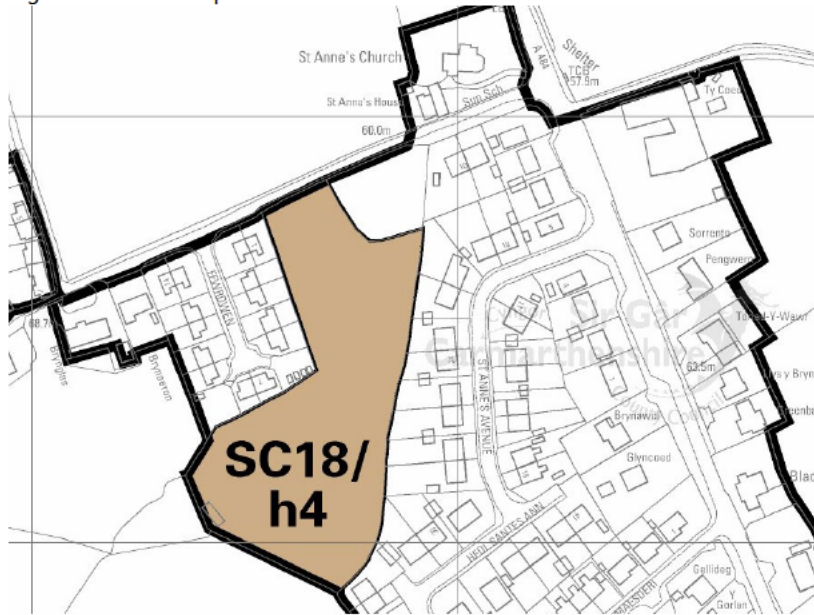
RE : Letter seeking a change to the draft LDP 2018 -2033 – a request to carry forward SC18/h4 from the current LDP into the 2018-2033 LDP (land between Ffrwdwen and St Annes Avenue, Cwmffrwd, Carmarthen.) 2nd Deposit February 2023.

In reference to LDP consultation in the village of Cwmffrwd please consider the following pertinent points in support of this application.

Planning / housing stock.

1. The land between Ffrwdwen and St Annes Avenue, Cwmffrwd, Carmarthen is allocated within the current Local Development Plan (LDP) for residential use with the reference SC18/h4. It is therefore reasonable to believe that as a competent authority Carmarthenshire County Council (CCC) undertook a due diligence process - involving all relevant departments - at pre-allocation stage of drafting the current LDP to ensure that the site was deliverable in all aspects. To be of value the LDP process must allocate sites upon their merits of delivery without significant burden to the Developer or indeed be reliant upon third party land take that could prevent delivery. The principle of development has already been established by a LDP process.
2. The current LDP has been considered to be sound.
3. The site currently sits within the "Development Limits" that have been drawn up by CCC for the village of Cwmffrwd.
4. SC18/h4 is approximately 1.1 hectares in size with a current allocation for 23 units. The current LDP Inset Map (Figure 1) is provided below.

Figure 1: Current Adopted LDP Inset



5. Other opportunities to build homes within Cwmffrd are very limited. This site is now considered to be the premier location within Cwmffrd to develop.
6. The site has little agricultural value due to the unfavourable soil type. The enclosure is best described as vacant land.
7. It is well documented that there is a chronic national housing shortage, and the provision of these houses would go some way to contributing to both the local and national target for new build homes. An under supply of desirable, modern, energy efficient housing fundamentally underpins the growth of an area. The upward pressure that the lack of housing within an area puts on house prices often displaces local young families to seek less amenable properties further afield.
8. The construction and habitation of new homes will provide significant annual income to Carmarthenshire County Council, Dyfed Powys Police Authority and Llandyfaelog Community Council through Council Tax revenue (upwards of £40,000 per annum). It is expected that the money derived from Council Tax would be a welcome addition to funding and bolster both the Council and Police Authority finances during the lifetime of the properties.
9. Demand for good quality housing both within Carmarthenshire and at a national level currently outstrips supply. This development will not only provide an opportunity for first time buyers to get onto the property ladder but also allow families already on the property ladder to move up the rungs thereby creating a turn-over of housing stock within the marketplace.
10. The Office for National Statistics (ONS) has recently reported that the UK population is projected to rise by 2.1 million to 69.2 over the decade to July 2030: this would be a 3.2% increase (see ONS website). Carmarthenshire shall need to a house a proportion of this increase.

St Anne's Lane.

11. St Anne's Lane is generally of straight horizontal alignment which provides good forward visibility. With CCC being a competent authority it would be correct to believe the intensification of St Anne's Lane would have been assessed during the previous LDP allocation stage.
12. As no footpath currently exists at the eastern section of St Anne's Lane then it is anticipated that as part of pedestrian improvements a footpath shall be provided to join the pavement that exits at Ffrwdwen and the A484.
13. R, H and D Jones have already commissioned Asbri Transport Limited to produce a Transport Technical Note. Page 20 of the Transport Technical Note states:

"These highway improvements will provide a betterment for existing and proposed residents of St Anne's Lane"

14. Paragraph 5.1.5 of the Transport Technical Note (p21) goes on to state that,

"there is no material harm in terms of highway and pedestrian safety associated with the proposed development".

15. This Transport Technical Note dated 11 May 2022, shall be presented at the hearing.

16. In line with the Welsh Government's strategy to reduce traffic speed within residential areas and introduce a default 20mph speed limit on restricted roads in Wales, on the 7th February 2023, Carmarthenshire County Council published a consultation document to enable residents to comment on such proposals within the County. As can be seen from the Figure 2 below, Carmarthenshire County Council propose that this section of St. Anne's Lane becomes a 20mph zone when the new default speed limit comes into effect on the 17th September, 2023.

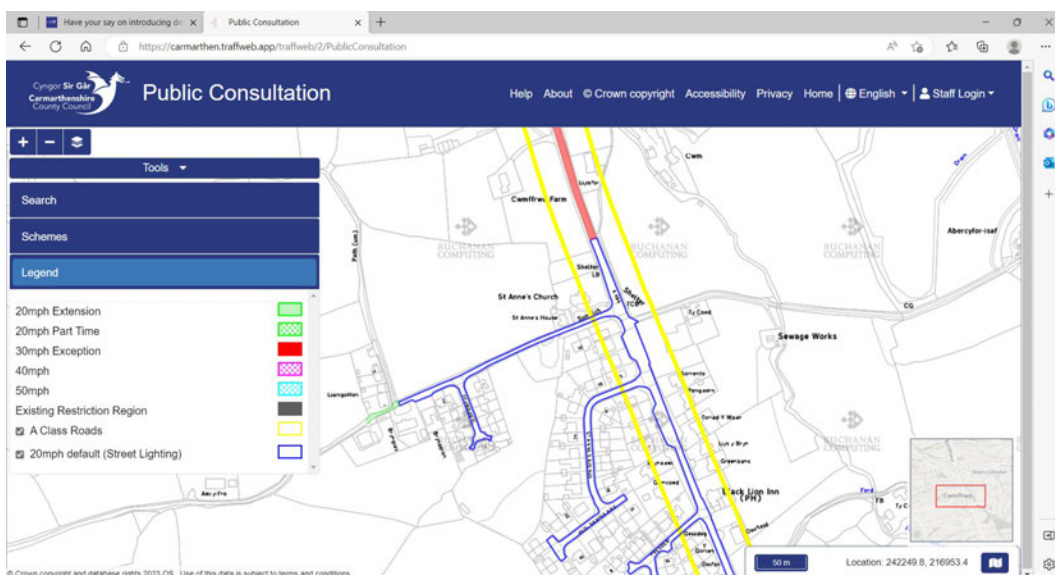


Figure 2 : Carmarthenshire County Council Public Consultation for 20mph

17. If this 20mph zone is adopted as expected then this will further enhance road user and pedestrian safety along St. Anne's Lane, and further reduce the visibility requirements.

18. A Swept Path Analysis for SC18/h4 has been undertaken by Roger Casey Associates Ltd. The proposed access into the site has been designed to accommodate a 10.3m refuse collection vehicle with an internal carriageway width of 5.5m and 1.8m wide footways.
19. The Swept Path Analysis dated June 2022 shall be produced at the hearing.

Employment / Economic Growth.

20. The addition of up to 23 new homes may secure the future and provide a reason for employment growth of several businesses that operate within Cwmffrwd. These existing businesses include a car garage, a children's nursery and a milkman. A florist, another children's nursery, a van hire business, a bridal boutique and a garden machinery business also trade from premises within a 1Km radius of the site. There are also numerous self-employed tradesmen within the locality and it is predicted that the provision of these dwellings may assist the viability of these local businesses.

Education.

21. The construction of 23 dwellings would yield a sizeable financial contribution towards local education provision via a s106 agreement (circa £25K).

Site specifics.

22. The design and development of the site will adhere to all current Building Regulations and requirements.
23. R, H and D Jones have commissioned Hammond Architectural Ltd to create an indicative site layout plan for 23 dwellings. The drawing indicates that all 23 units can easily be accommodated on the proposed site together with an area for 'Sustainable Urban Drainage' (SUDS).
24. The indicative site plan produced by Hammond Architectural Ltd during February 2022 shall be presented at the hearing.
25. Cwmffrwd is a desirable village due to its proximity to Carmarthen. It is envisaged that due to the level of demand for new homes in and around Carmarthen, some- if not all – of these proposed houses will be purchased "off plan".

Environmental.

26. Due to advancements in energy efficient materials and construction techniques the homes will be built to an enhanced environmental standard with greater energy efficiencies and a lower carbon footprint than older housing stock.
27. Natural Resources Wales have no objection to the site being developed. Evidenced by letter dated 4 October 2022 that shall be presented at the hearing.
28. The site is not on a floodplain.
29. The site is not within a Special Site of Scientific Interest (SSSI).

30. The site is not designated a Special Area of Conservation (SAC).
31. The site is not contaminated with solid or liquid waste.
32. The site has already been checked for the presence of protected flora and fauna including dormice and bats. Separate Dormouse and Bat surveys have been undertaken by I+E Ecology Consulting Ltd. In both cases the surveys concluded that the habitat was not conducive to these species, and development would not be detrimental to the conservation of these protected mammals. Both these surveys shall be presented at the hearing.
33. A tree survey has been undertaken by Arboricultural Technician Services Ltd during September 2022. The survey confirmed that no trees were present on SC18/h4. This survey shall be presented at the hearing.
34. During February 2023, R, H and D Jones commissioned I+G Ecology Consulting Ltd to produce a Reptile and Amphibian Mitigation Method Statement. This method statement recommends that any site clearance is undertaken in a phased approach with gradual and stepwise reduction in potential reptile habitat in order to encourage natural reptile dispersion from the site. This method statement shall be presented at the hearing.
35. Odour, dust and noise will be kept as low as reasonably practicable during the construction phase to minimise any detrimental impact and inconvenience to dwellings and residents within the vicinity by adherence to industry best practise and guidelines.

Transport.

36. A detailed Transport Technical Note accompanies this application with the inclusion of both strong and favourable conclusions.
37. Cwmffrwd benefits from being on a bus route that is regularly serviced. This mode of public transport allows people to travel easily and quickly into Carmarthen, Llanelli and many other villages within the district.
38. Carmarthen is accessible from Cwmffrwd by an established continuous footpath.
39. A well-used cycle path runs through Cwmffrwd and onto Carmarthen.
40. An Automatic Traffic Count took place St Anne's Lane during September 2021. This survey revealed that the mean two-way measured speed is 18.3 miles per hour. The 85th percentile speed is 24.4 miles per hour, based upon a total of 979 vehicular movements over 7 days. This report shall be presented at the hearing.
41. No known traffic accidents have occurred along St Anne's Lane.

Utilities.

42. All utility services are available close by. Dwr Cymru Welsh Water have advised that there is capacity within their network. This is evidenced by a letter from Dwr Cymru Welsh Water dated 24 July 2022.
43. Internet connectivity within Cwmffrwd is very good and this feature will definitely assist individuals who "Work from Home" and children's educational needs.

Social.

44. It is possible that occupiers of these proposed new homes will use St Anne's Church Hall for social functions and may become members of either of the two Places of Worship that exist within Cwmffrwd – namely St Anne's Church and The Seventh Day Adventist Church. Both these Places of Worship are considered hubs within the community and it is predicted that each church would welcome new membership in order to secure the future of each.

45. Due to the quality, spacing and relatively low number of these new homes it is likely that this proposed housing development shall probably increase the value of neighbouring properties rather than devalue them as Cwmffrwd will be considered by many as an "aspirational village" where people would like to live.

The library of documents referenced above give strong evidence that SC18/h4 is already a live site whilst the paragraphs support our application that this land should be carried forward as a housing allocation into the next Adopted LDP.

Yours faithfully,



R, H & D Jones.