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27th March 2020

Forward Planning
Carmarthenshire County Council
5-8 Spilman Street
Carmarthen
Carmarthenshire
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Dear Sir/Madam,

**Carmarthenshire Local Development Plan Review – Site Representation
Land South of Cwmgarw Road, Brynamman**

Please find enclosed, on behalf of and under instruction from our clients, Mrs H Wight and Mrs C Dudlyke, a detailed Site Representation, submitted to Carmarthenshire County Council for consideration for inclusion / allocation / retention within the Carmarthenshire Local Development Plan (LDP) Review.

As required, to enter the site for evaluation within the LDP process at this stage of plan preparation, the following documentation is enclosed with this submission:

- Ordnance Survey based site plan (identifying the land in question and the land under ownership); and
- Detailed case provided in an addendum below.

In addition to the enclosed documentation, a detailed case for the retention of the site's allocation within the current LDP, and inclusion of the Site within the emerging LDP as a housing allocation is provided - which is requested to be carefully and thoroughly taken into consideration in appraising the Site Representation and the site's credentials for inclusion within the new Development Plan. As well as promoting the retention of the existing allocation within the LDP (Option 1), this representation also seeks to allocate the wider land beyond the existing allocation (Option 2) – in line with Candidate Site ref. SR/015/004. As such, this representation comprises an objection to the Deposit Plan on the basis that the site is to be delivered as a residential development during the Plan period.

We look forward to hearing from you in due course. In the meantime, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Yours sincerely



Geraint John
Director
Geraint John Planning Ltd.

Detailed Site Representation

As set out on the previous page, these representations object to the Deposit LDP on the basis of the lack of inclusion of deliverable sites. Those being:

- (1) The retention of the existing allocation (ref. T3/9/h4) in the LDP;
- (2) The allocation of Candidate Site ref. SR/015/004 – which includes LDP allocation T3/9/h4.

The above sites are illustrated on the maps below:

Existing Allocation T3/9/h4 – Option 1



SR/015/004– Option 2



The representations below set out the objection as a whole against the non-inclusion of the 2 options presented.

Site Description /Characteristics: Historic & Existing

This representation relates to the Land South of Cwmgarw Road in Brynamman. As noted above, the representation proposes two options:

- 1) The retention of the existing allocation (ref. T3/9/h4) in the LDP;
 - 2) The retention of the existing allocation in the LDP, as well as the allocation of the wider land within the site promoters ownership surrounding this site for residential development (as per Candidate Site ref. SR/015/004).
- The site is a irregularly shaped greenfield space, consisting of fields and bounded by trees;
 - The site promoted in Option 1 is approximately 2ha in area and represents a portion of a wider allocation (approx. 3.5ha total) for residential development in the current LDP;
 - The site promoted in Option 2 is approximately 4ha in area and comprises of the land allocated for residential development in Option 1, as well as additional land to the south within the site promoters ownership;
 - The site is accessed via two access points in its north-eastern and north-western corners, which are both within the ownership of the site owner;
 - The southern and western boundaries of the site comprise of further greenfield land;
 - The northern and eastern boundaries of the site consist of the rear gardens of the properties along Cwmgarw Road.



Site Location Plan with Option 1 Filled in Blue and Option 2 Outlined in Red

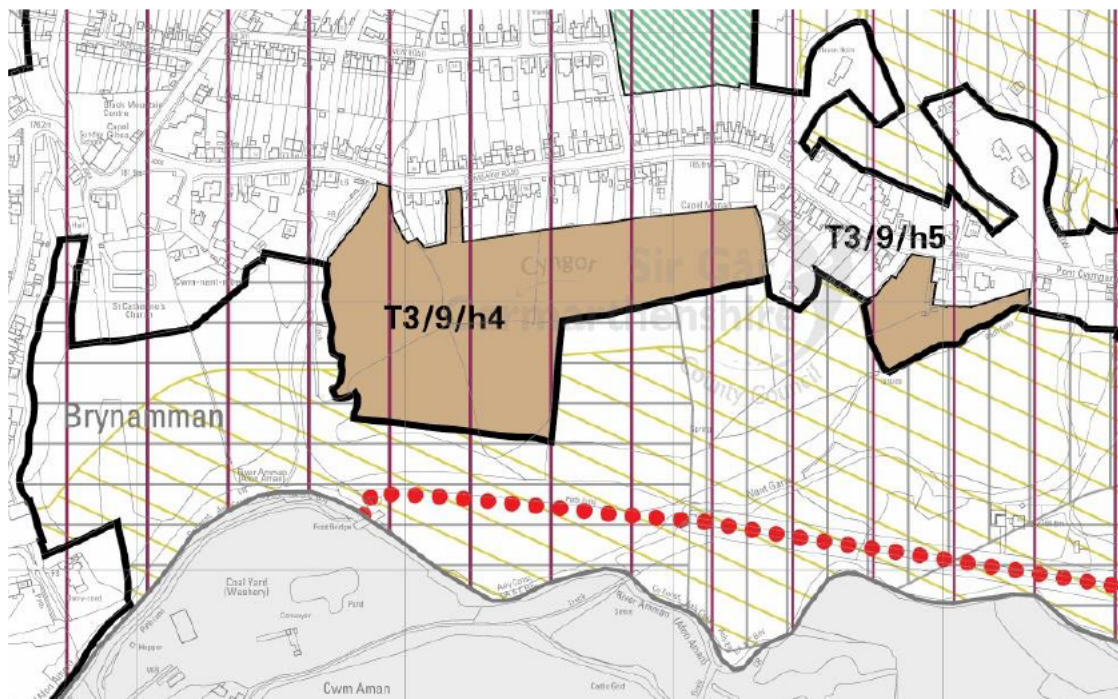
Planning History

A review of the Council's online application system (map based) has been undertaken, with one historic Planning application having been submitted in relation to the site.








An application (ref. E/17076) seeking Planning Permission for a new access vehicular access to the site from Cwmgarw Road was approved by the Local Planning Authority on 30th July 2008. The approved access point is situated adjacent to the Tregib Arms public house, at the north-western corner of the site.

Current Planning Status – Designation in the Adopted Local Development Plan

LDP Proposal Map Extracts



Proposals Map Extract

Symbol	Designation	Symbol	Designation
	Development Limits (GP2)		Residential Allocation (H1)
	Cycle / Proposed Cycle Route (TR4)		Recreation / Open Space (REC1)
	Higher Proportion of Welsh Speakers (SP18)		Category 2 Sand and Gravel (MPP3)
	Coal Primary Resource Zone (MPP3)		

To summarise, the site is:

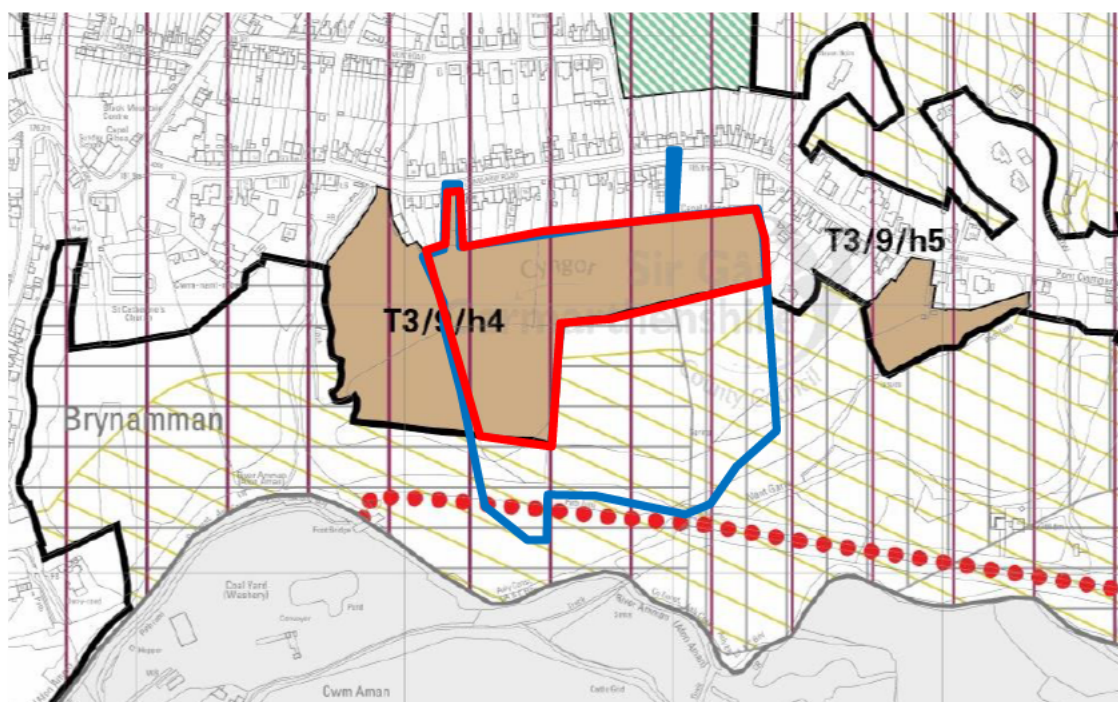
- Located within settlement limits of Brynamman;
- Allocated for residential development (ref. T3/9/h4);
- Situated within an area with a Higher Proportion of Welsh Speakers;
- In close proximity to an existing / proposed Cycle Route; and
- In proximity to Recreation / Open Space – situated to the north of the site.

The LDP contains a significant number of policies of potential relevance to any development of the site. The key policies of relevance to the site and any proposal are appended to this overview (**Appendix A**).

Site Promotion

Candidate Sites Register

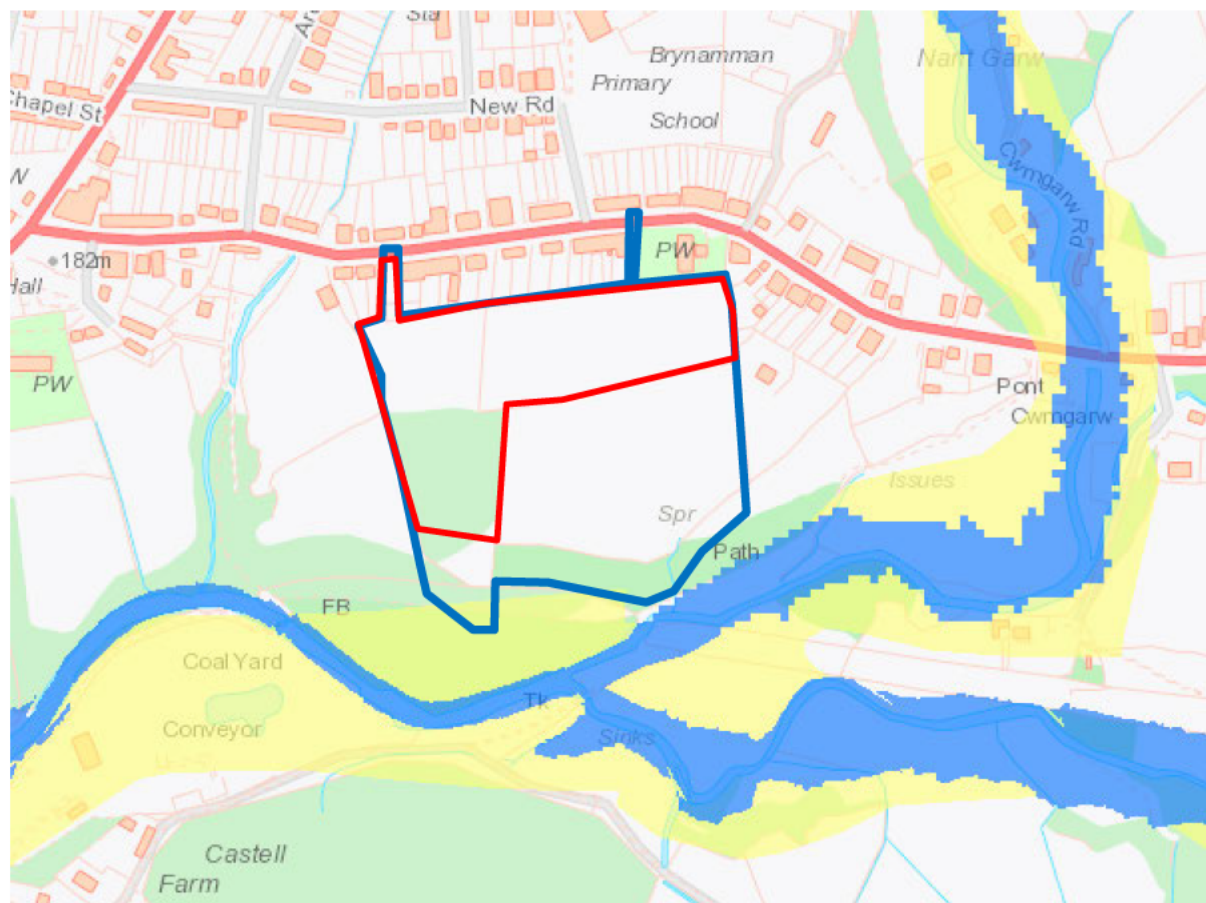
Consultation of the Candidate Sites Register associated with Brynamman confirms that the site promoted as Option 2 was submitted as a Candidate site, while, as outlined above, the site promoted as Option 1 (as well as the northern parcel of Option 2) forms part of an existing LDP allocation. The Candidate site and the wider allocation are outlined on the below extract of the LDP Proposals Map.



Option 1 Outlined in Red and Option 2 in Blue





Flood Risk

The relevant extract from Natural Resources Wales' Development Advice Map (DAM) (NRW) Flood Map is provided overleaf. This confirms that the representation site is not at risk of flooding.



Extract from NRW Flood Map

Key:

 Zone C1	 Zone C2	 Zone B	 Zone A
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Heritage and Conservation

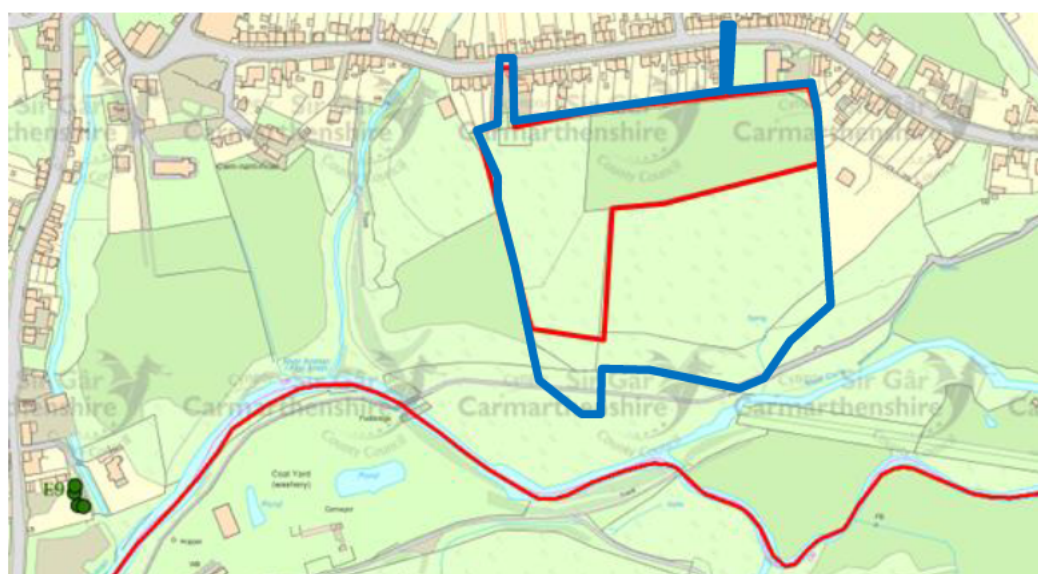
The Historic Wales website indicates that there are no Listed buildings or Scheduled Ancient Monuments on or within close proximity of the site. Moriah Chapel, situated in the north-eastern corner of the site, is contained as a National Monument Record for Wales and within the Welsh Archaeological Trusts' Historic Environment Records as a post-medieval church. Given the residential setting of the chapel, the impact of the residential development of the site is expected to be negligible.



Extract from NMR (Historic Wales)

Tree Preservation Order (TPO)

Carmarthenshire County Council's online map indicates that there are no protected trees on site as illustrated below:

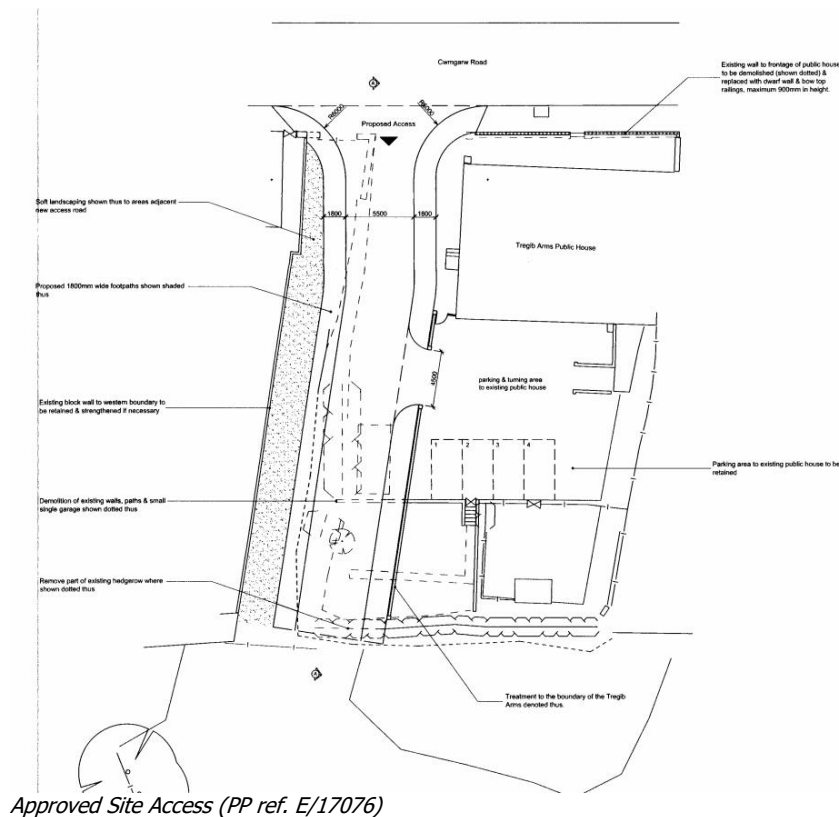


TPO Map Extract

A tree survey of the site has been carried out by ArbTS which will guide the form of development proposed at the site. It is considered that appropriate access, infrastructure and built form can be incorporated within the site without detrimentally impacting the existing trees on the site.

Access

In terms of site access, vehicular access to the site can be gained, and is proposed via the existing access in the north-western corner of the site, adjacent to the Tregib Arms public house. The site benefits from an existing Planning Permission for an upgraded access in this location, with an extract of the proposed access included below. Evidently, a safe and appropriate access to serve the residential development of the site is achievable in this location.



Opportunities for pedestrian links to the site are also available, with an existing pedestrian access to the north-eastern corner of the site in place adjacent to the Moriah Chapel. Further to this, and as highlighted on the LDP Proposals Map extract above, there is an existing cycle route which runs adjacent to the site to the south. Once developed, there would be an opportunity to provide a link between the site and the cycle path in the south – improving accessibility to sustainable transport options.

Candidate Sites: Assessment Criteria & Methodology

We are aware that, in appraising the credentials of sites for inclusion as an allocation in the Plan, a series of criteria and a methodology have been defined and adopted.

We are also aware that the appraisal process consists of multiple stages, summarised as the following:

- Stage 1: An assessment of the site and its compatibility with the Preferred Strategy;

- Stage 2a: Identification of fundamental site constraints that cannot be overcome or mitigated for;
- Stage 2b: Detailed, site specific assessment including an analysis of its sustainability, viability and deliverability, as well as the assessment of the site against a SA/SEA;
- Stage 3: The sites will be further assessed with a HRA to be carried out to ensure that the Deposit plan has no significant detrimental impact on European Designated Sites.

The stage 1 assessment, as set out within the Site Assessment Methodology (September 2019) included criteria to filter sites out where they may be contrary to National Policy, or unsuitable due to overarching constraints (unless sufficient information is provided to prove otherwise). As set out above, the site is NOT any of the following designations:

- Sites of Special Scientific Interest;
- Special Area of Conservation;
- Special Protection Areas;
- Local Nature Reserves;
- National Nature Reserves;
- Historic Parks and Gardens;
- Scheduled Ancient Monuments;
- C1 and C2 Flood Zones;
- Coal Safeguarding Areas;
- Land Stability and Coal Mining Issues (That are not remediable for economic or other reasons);
- Hazardous Installation Facilities;
- Landfill Sites; and
- Areas of Contamination (That are not remediable for economic or other reasons).

According to the LDP Site Assessment table, the site was found to be compatible with the location of future growth presented within the Preferred Strategy and as a result passed Stage 1. The Candidate Site also went on to pass Stage 2a of the Site Assessment, having been found to have no fundamental constraints which cannot be overcome or mitigated for.

The candidate sites' performance in these respects have been previously dealt with at both the Candidate Site Stage for the current LDP, prior to its allocation within the Plan, and at the same stage for the Deposit Plan and as a result will not be rehearsed within these representations.

The Site Assessment table outlines that the site failed the Stage 2b Assessment, with the comments noting that this was due to concerns regarding the deliverability of the site. The comments go on to state that *'The site represents a longstanding residential allocation and no firm progress has been made on delivery. Sufficient residential opportunities exist within the settlement'*.

As such, the representations below will relate to the assessment of the site at Stage 2b, in particular highlighting its deliverability during the Plan period.

Key Issues

It is considered that the key arguments in support of the inclusion of the Candidate Site within the LDP for residential development relate to areas identified within the Site Assessment Methodology 'Stage 2b', relating largely to site deliverability – this being the sole concern raised within the Sites Assessment at this stage. Notwithstanding this, and in order to further promote the suitability of the site (Options 1 and 2) for residential development, a detailed analysis of the sites sustainability is also included below in line with the methodology for assessing sites at Stage 2b.

Deliverability

The site could make a realistic (and sustainable) contribution towards the provision of housing land within Carmarthenshire over the LDP period.

The land – representing a large portion of the site as allocated within the existing LDP – is wholly within the ownership of the site promoters, Mrs H Wight and Mrs C Dudleyke, and no restrictions / constraints to the development of the site coming forward over the plan period are identified. The land is readily available to come forward for development, as evidenced by the progress being undertaken by the site owners, with pre-application consultation (PAC) expected to commence in the coming weeks (early to mid-April), running for 28 days in line with national legislation. Following the conclusion of the PAC process, an outline application for the residential development of Option 1 (i.e. the eastern portion of the existing LDP allocation) is expected to be submitted imminently.

In the lead up to the PAC process, a number of site surveys and reports have been carried out in order to inform a future application, with no constraints of note identified which cannot be appropriately mitigated for.

A Transport Statement was prepared in relation to the development, which confirmed that the site is well located to encourage sustainable modes of travel due to its proximity to the facilities and amenities of Brynamman. Further to this, the site is linked by bus to larger nearby settlements and employment centres further afield and as a result is considered to be inherently sustainable in nature. In terms of the impact of the development on the local highway network, the increase in vehicular trip generation as a result of the development is expected to be low, resulting in a negligible impact on traffic levels during peak times.

The site will provide on-site parking provision in line with Carmarthenshire's adopted parking standards. Given this, and the location of the site set back from Cwmgarw Road, the proposed development is unlikely to result in any additional on-street parking on the main highway through Brynamman, which could potentially cause a highway safety issue.

As outlined above, a tree survey of the site has been carried undertaken, with no constraints to the development of the site found. Every effort will be made to protect any trees worthy of retention, while appropriate mitigation measures will be put in place in the form of replanting for any trees which require removal.

Wildwood Ecology visited the site to undertake a PEA in February 2020, following an initial survey of the site in 2012. The ecological report produced outlines that habitats found on the site consist largely of Marsh / Marshy Grassland, Broadleaved Woodland and Scrub. The report recommends that updated otter, reptile and bat reports are required, while the site also has potential for dormice. Once the development proposals and site layout are finalised a suitably qualified ecologist should be consulted to confirm the ecological impacts of the development so that appropriate mitigation and recommendations can be made.

Following the conclusion of the PAC process, it is envisaged that – subject to consultation responses received – an outline application for the development of the site will be submitted in May 2020.

Clearly there is ample evidence provided that the site, and as a result the majority of the existing allocation, is wholly deliverable during the early stages of the revised LDP. Following the progression of the existing allocation to the application stage, the site promoters will seek to maintain momentum and progress an application for the development of the land to the south, included as Option 2 in this representation. This land, which will be subject to further survey works, will represent a logical second phase to the development of Option 1, and will help to provide sustainable links between the housing allocation and the cycle route to the south. It is considered that the inclusion of this land for

residential development within the LDP will assist the Local Authority in meeting their housing needs provision.

Sustainability

Sustainability and Linkages with Nearby Settlements

As referred to above, the site is located within the settlement limits for Brynamman, which is identified as a Local Service Centre within the current local development plan. As a result, the site has close association and linkages with the facilities and services available within the settlement. A key destination for local residents is The Black Mountain Centre, which comprises a community centre including a café, post office, library and doctors surgery. Other services located within the settlement and within close proximity to the site include a number of public houses, places of worship, food / retail outlets and amenity / recreational facilities.

Pedestrian footways are provided on both sides of Cwmgarw Road with a general width of at least 1.5m, albeit with some instances of localised narrowing due to physical constraints or footway parking. There are also opportunities for cycling in the area, mainly consisting of on-carriageway routes although National Cycle Route 437 is accessible within 500m of the site, linking the site to Ammanford in the west and Cwmllynfell in the east.

Evidently, the site is located in a highly accessible location, within easy and convenient walking distance of the services provided within Brynamman, with a range of facilities on offer. The site therefore benefits from being positioned within a highly sustainable location – which in light of the availability existing services and facilities, is considered extremely well-suited to residential development. It is considered that the services and facilities in close proximity to the site would facilitate and encourage the growth of the settlement in both a natural and sustainable manner.

Public Transport

The proposed development site is well served by public transport with a number of regular scheduled bus services running along Cwmgarw Road. Bus stops are available well within the recommended maximum walking distance of 400m from the application site, with travel via bus available in both directions near the site frontage.

The bus stops along Cwmgarw Road are served by service numbers X26, 64, 124, 167 and 905, providing services to Swansea, Upper Brynamman, Tycroes, Neath Abbey, Ammanford, Ystradgynlais, Crynant and Cwmtwrch Isaf.

In terms of rail transport, Ammanford railway station is located approximately 9.4km to the west of the site. Whilst not convenient for all, it could be used as part of a multi-modal journey along with a car, taxi, bicycle or bus.

Summary

As outlined above, it is considered that the site is a highly suitable location for housing, and for inclusion as such within the emerging LDP at the Candidate Site stage. To summarise:

- The land lies within the settlement boundary for Brynamman, and within a defined 'Local Service Centre'.
- The site (Option 1) is currently afforded a residential allocated status within the currently adopted LDP, and this should be considered as the baseline for the site.

- The development of the site would not unduly damage the character of the surrounding area, due to the site's location within an existing residential area and its strong association with the settlement of Brynamman.
- The site benefits from a close association and connection with the services and facilities provided within Brynamman, which are situated within convenient walking distance (which would facilitate sustainable growth of the settlement).
- The sustainability and accessibility credentials of the site lend themselves to supporting residential development at this location – several bus stops are located immediately north of the site on Cwmgarw Road.
- The land is not identified as being of any special landscape / nature conservation / ecology interest – it is not afforded any such protection status within the current LDP; and
- It is considered that the inclusion of this land for residential development will assist the Local Authority in meeting their housing needs provision.
- The site is wholly deliverable and can realistically come forward within the early years of the Plan period.
- Object to the Deposit LDP on the grounds that the site isn't included and is set to be delivered, as set out above.

Conclusions

We consider that the site 'performs' well against the defined assessment criteria and methodology, with no evident constraints, obstacles, or failings.

Our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters.

We respectfully urge you, for the reasons given herein and in the associated submitted information, to include the site put forward within the emerging LDP for housing development.

APPENDIX A – CARMARTHENSHIRE PLANNING POLICY

Ref.	Title	Summary
SP1	Sustainable Places and Spaces	Proposals for development will be supported where they reflect sustainable development and design principles subject to a number of criteria.
SP2	Climate Change	Development proposals which respond to, are resilient to, adapt to and minimise for the causes and impacts of climate change will be supported subject to a number of criteria.
SP3	Sustainable Distribution – Settlement Framework	Provision for growth and development will be at sustainable locations in accordance with the settlement framework. Llanelli is identified as a Growth Area.
SP9	Transportation	Proposals should contribute to the delivery of an efficient, effective, safe and sustainable integrated transport system.
SP13	Protection and Enhancement of the Built and Historic Environment	Development proposals should preserve or enhance the built and historic environment of the County, its cultural, townscape and landscape assets and where appropriate, their setting.
SP14	Protection and Enhancement of the Natural Environment	Development should reflect the need to protect, and wherever possible enhance the County's natural environment. All development proposals should be considered in accordance with national guidance/legislation and the policies and proposals of this Plan, with due consideration given to areas of nature conservation value, the countryside, landscapes and coastal areas.
GP1	Sustainability and High Quality Design	Development proposals will be permitted where they accord with a range of criteria.
GP2	Development Limits	Proposals within defined Development Limits will be permitted, subject to policies and proposals of this Plan, national policies and other material planning considerations.
GP3	Planning Obligations	The Council will, where necessary seek developers to enter into Planning Obligations (Section 106 Agreements), or to contribute via the Community Infrastructure Levy to secure contributions to fund improvements to infrastructure, community facilities and other services to meet requirements arising from new developments.
GP4	Infrastructure and New Development	Proposals for development will be permitted where the infrastructure is adequate to meet the needs of the development.
H1	Housing Allocations	Land has been allocated for residential development for the plan period 2006 – 2021 at those locations as set out in the LDP, and as depicted on the Proposals Map.
H2	Housing within Development Limits	Proposals for housing developments on unallocated sites within the development limits of a defined settlement will be permitted, provided they are in accordance with the principles of the Plan's strategy and its policies and proposals.
AH1	Affordable Housing	A contribution to affordable housing will be required on all housing allocations and windfall sites. The Council will seek a level of affordable housing contribution of 30% in the higher viable areas, 20% in the middle viable areas, and 10% within the Ammanford / Cross Hands sub-market areas. Where viability at the target levels cannot be achieved, variation may be agreed on a case-by-case basis.
TR2	Location of Development – Transport Considerations	States that proposals which have a potential for significant trip generation will be permitted where: a) it is located in a manner consistent with the plans strategic objectives, its settlement framework and its policies and proposals; b) it is accessible to non-car modes of transport including public transport, cycling and walking; c) provision is made for the non-car modes of transport and for those with mobility difficulties in the design of the proposal and the provision of onsite facilities; d) travel plans have been considered and where appropriate incorporated.
TR3	Highways in Developments – Design Considerations	The design and layout of all development proposals will, where appropriate, be required to include a range of criteria. Proposals which do not generate unacceptable levels of traffic on the surrounding road network and would not be detrimental to highway safety or cause significant harm to the amenity of residents will be permitted. Proposals which will not result in offsite congestion in terms of parking or service provision or where the capacity of the network is sufficient to serve the development will be permitted.
TR4	Cycling and Walking	Developments should, where appropriate seek to incorporate, or where acceptable, facilitate links to the cycle, rights of way and bridleway network to ensure an integrated sustainable approach in respect of any site.
REC2	Open Space Provision and New Developments	All new residential developments of five or more units will be required to provide on site open space in accordance with the Council's adopted standards of 2.4ha per 1000 population.

Ref.	Title	Summary
EQ4	Biodiversity	Proposals for development which have an adverse impact on priority species, habitats and features of recognised principal importance to the conservation of biodiversity and nature conservation, will not be permitted, except where it can be demonstrated that unless specific criteria can be met.
EP1	Water Quality and Resources	Proposals for development will be permitted where they do not lead to a deterioration of either the water environment and/or the quality of controlled waters. Proposals will, where appropriate, be expected to contribute towards improvements to water quality.
EP2	Pollution	Proposals for development should wherever possible seek to minimise the impacts of pollution. New developments will be required to demonstrate that they: <ul style="list-style-type: none"> • Do not conflict with National Air Quality Strategy objectives, or adversely affect to a significant extent, designated Air Quality Management Areas; • Do not cause a deterioration in water quality; • Ensure that light and noise pollution are where appropriate minimised; • Ensure that risks arising from contaminated land are addressed through an appropriate land investigation and assessment of risk and land remediation to ensure its suitability for the proposed use.
EP3	Sustainable Drainage	Proposals for development will be required to demonstrate that the impact of surface water drainage, including the effectiveness of incorporating Sustainable Drainage Systems (SUDS), has been fully investigated