



REPRESENTATION STATEMENT

2nd DEPOSIT CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN **2018-2033**

**OBJECTION TO THE EXCLUSION OF LAND
AT
GREENHILL BUNGALOW, BLACK LION ROAD,
CAPEL HENDRE, AMMANFORD,
CARMARTHENSHIRE, SA18 3SD**

on behalf of

Mr. & Mrs. P. Underwood

Our Ref: 2133.a/CLJ/23
Date: March 2023
Prepared by: CLJ

Email: [REDACTED]

Tel: [REDACTED]

Web: www.jcrplanning.com

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OBJECTION SITE: OVERVIEW

This statement is submitted as an objection to the 2nd Deposit Carmarthenshire Local Development Plan (LDP) and has been prepared to demonstrate that an area of land at Greenhill Bungalow, Black Lion Road, Capel Hendre should be identified for residential development.

The inclusion of this land within the development limits for Capel Hendre would contribute to the overall strategic aims and objectives of the LDP, as well as contributing to the sustainable housing resource for the benefit of the local community.

This submission seeks an amendment to the specific alignment of the LDP development limits in the vicinity of Greenhill Bungalow, Black Lion Road, Capel Hendre. The 2nd deposit development guidelines for Capel Hendre adjoin the objection site. This submission requests that the plan be revised to include this part of Capel Hendre within the development limits and thus provide for the future housing needs of the local area.

1.0 INTRODUCTION

- 1.0.1 JCR Planning Ltd. has been instructed by Mr. and Mrs. P. Underwood (the landowners) to prepare an objection representation seeking the allocation of an area of land at Greenhill Bungalow, Black Lion Road, Capel Hendre. 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 submitted 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.

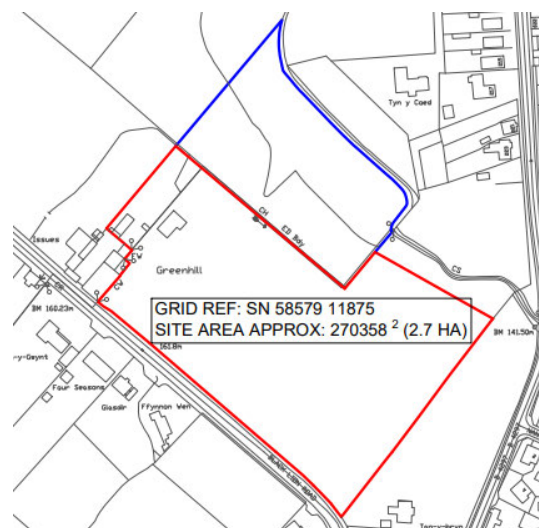


Fig. 1 – Objection site boundary

2.0 SITE CONTEXT

2.1 THE OBJECTION SITE

- 2.1.1 The objection site and its relationship to Capel Hendre is highlighted in the 'Ordnance Survey' extract at *Figure 2*.



Fig. 2 – Relationship of objection site to the settlement of Capel Hendre

- 2.1.2 The objection site is located on the north-western edge of Capel Hendre and is situated immediately adjacent to existing residential development, being directly related to the established built form.

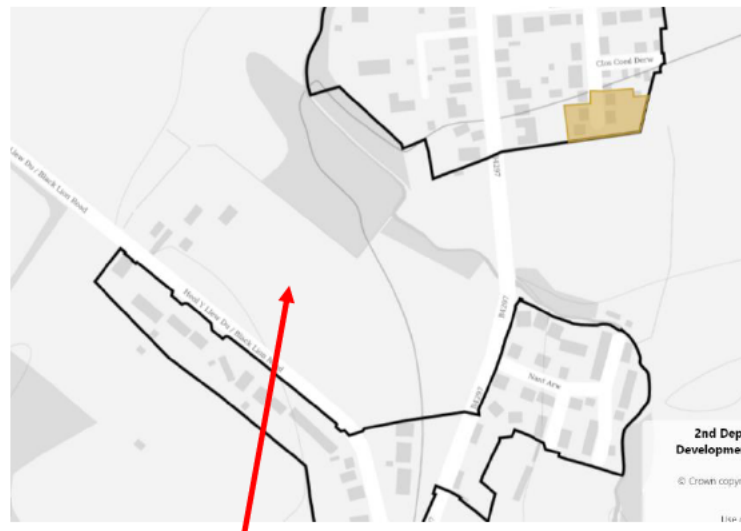


Fig. 3 – Relationship of objection site to proposed development limits for Capel Hendre

- 2.1.3 The site's south-western boundary is formed by Black Lion Road. The northern and eastern boundaries are generally constrained by existing development and Waterloo Road. The gently sloping site comprises agricultural land of a largely regular shape.
- 2.1.4 The relationship of the objection site in terms of proximity to the adjacent public highways and its position at the juncture of those highways readily lends itself to an appropriate form of residential development. Indeed, with existing residential development on all sides, the site could be regarded as an ideal 'infill' opportunity.



Fig. 4 – Relationship of objection site to Black Lion Road (towards SE)



Fig. 5 – Relationship of objection site to Black Lion Road (towards NW)

- 2.1.5 The favourable road alignment at this location provides more than adequate horizontal and vertical visibility in both directions, allowing the site to be served by a safe and efficient access (see *Figures 4 and 5*).
- 2.1.6 For the purposes of this submission, the accompanying illustrative layout (*Figure 6*) shows a site access direct from Black Lion Road, providing a convenient means of vehicular access for the proposed development. 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.
- 2.1.7 *Figure 6* provides an aerial image of the objection site and its general surroundings. The site's proximity to existing residential development on all sides is clearly evident.



Fig. 6 – Aerial view of objection site in relation to surrounding built form

- 2.1.8 The general area is characterised by a mix of residential dwelling styles. The objection site readily lends itself to either a frontage development scheme of sizeable detached dwellings or alternatively a more in depth scheme comprising more modest sized properties. Development in this locality reflects the legacy of the incremental development that has occurred over the years. It is evident that the objection site has a close physical relationship to Capel Hendre's built form and that of Penygroes to the north.

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- 2.1.9 Topographically, the objection site is gently sloping, has been extensively grazed, and does not contain features of note. Any significant boundary trees will be protected during the development phase. Any trees that need to be felled will be replaced by mitigating tree planting on a 'three trees for each one felled' basis. A small area of ancient woodland is located adjacent to the northern perimeter of the site which will be excluded from the development and managed in accordance with appropriate arboricultural practices.
- 2.1.10 In summary therefore, there is no amenity feature within or adjacent to the site that will prevent its appropriate, future, efficient development.

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

- 2.2.1 Within the 2nd Deposit LDP, the settlement of Capel Hendre forms part of the identified Ammanford/Cross Hands Tier 1 Principal 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.
- 2.2.2 The LDP states that appropriate residential development within a Tier 1 Principal Centre includes housing allocations, small housing sites (less than 5 dwellings), affordable housing provision (5 or more units) and windfall housing opportunities. The objection site is considered suitable for all of the foregoing types of residential development.
- 2.2.3 More specifically, in terms of accessibility, Capel Hendre has frequent, regular bus services and is conveniently situated between Cross Hands and Ammanford with their wide range of facilities and services, including retail, secondary and tertiary education, healthcare, libraries, cinema, sport and recreation, and employment opportunities.
- 2.2.4 The objection site is ideally located in terms of walking distance to a range of nearby services and facilities, including a primary school, retail outlets, cafes and employment opportunities, etc. In addition, the site enjoys ease of access to the strategic highway network at both nearby Cross Hands (A48) and Pont Abraham (M4). Ammanford also facilitates rail service access providing links, via Llanelli, to the London to Fishguard mainline and also the Heart of Wales service to various settlements to the north

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

2.2.6 In terms of future planned residential growth within Capel Hendre the 2nd Deposit LDP Proposals Map extract below shows that there are no allocated sites within the settlement. This represents something of an anomaly in that within the proposed development limits there are not only two large designated existing employment allocations (EME1 - Capel Hendre Industrial Estate and Parc Hendre) but also the following proposed employment areas:-

- PrC3/E6 – land at Capel Hendre Industrial Estate
- PrC3/E7(i) – land at Parc Hendre (West)
- PrC3/E7(ii) – land at Parc Hendre (North)
- PrC3/E7(iii) – land at Parc Hendre (East)
- PrC3/E7(iv) – land at Parc Hendre (South)

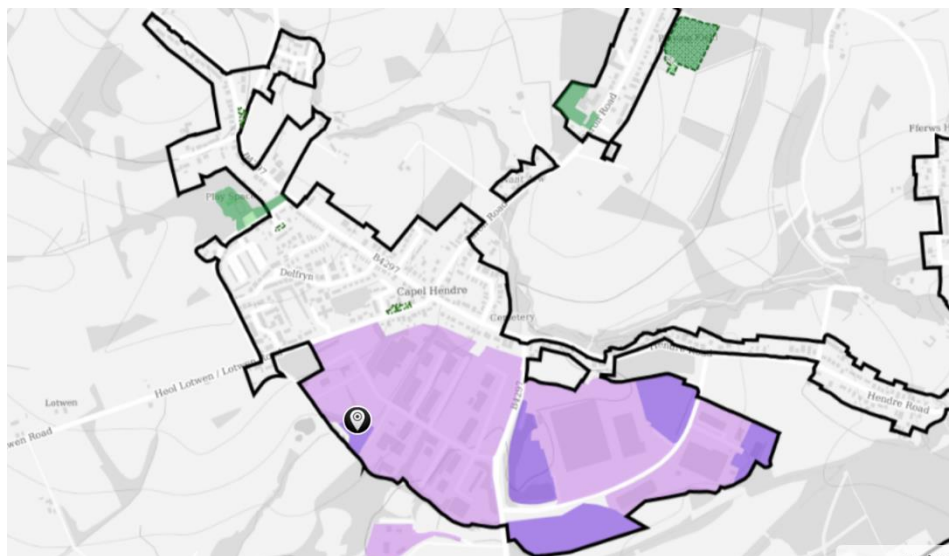


Fig. 7 – 2nd Deposit LDP extract showing planned growth for Capel Hendre

2.2.7 There is clearly limited potential for residential development within Capel Hendre when the substantial existing and planned employment growth is taken into consideration. The amount of potential residential development land within Capel Hendre is clearly restricted, a shortfall which needs to be addressed.

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- 2.2.8 The net result of this lack of residential development sites means that, despite Capel Hendre's Tier 1 Principal Centre status and the Local Authority's intention to direct employment growth to the settlement, the sustainability credentials of such an approach are lacking in that employees will be required to travel to their place of employment as a result of there being no residential development opportunities within Capel Hendre itself. In order to address this deficit in residential provision, and to capitalise fully on the sustainability of this Principal Centre, more readily deliverable residential allocations are urgently required – such as the objection site.
- 2.2.9 The designation of the objection site as a residential allocation in the forthcoming 2nd Deposit LDP will assist in addressing this imbalance and will provide a much needed range and choice in terms of residential accommodation within Capel Hendre.

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 2nd Deposit 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 location is sustainable 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.

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- 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 objectives 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. The majority of the objection site is bordered by existing residential development.
- 3.0.9 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. Capel Hendre can accommodate a significant level of development without damage to its character. New housing would help to sustain this settlement by providing additional critical mass for maintaining local services, facilities and employment opportunities.
- 3.0.10 Essentially, directing new development and investment to those locations that already have a range of facilities, services and employment opportunities, 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 close to public transport corridors and within a convenient distance of a wide range of services and facilities. The fact that Capel Hendre with its recognised existing and planned future employment growth has no allocated residential development sites is a situation that needs to be corrected.
- 3.0.11 The inclusion of the objection site within revised development limits for Capel Hendre 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 difficulty.
- 3.0.12 In summary therefore, the allocation of the objection site would adhere to and support the objectives, principles and requirements of national planning policy.
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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 objection 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 8*) demonstrates that the objection site is capable of accommodating an appropriate development in a deliverable, efficient and sustainable manner.



Fig. 8 – Development option for objection site

4.1.2 The objection site is readily capable of accommodating residential development that would reflecting the existing form and density of existing housing schemes in the locality. As shown in the illustrative layout, it is suggested that the site could also

include landscaping/planting to enhance biodiversity and create greenspace for residents' well-being.

- 4.1.3 With regards to access, it is proposed that the objection site be served by its own individual means of access from Black Lion Road, with appropriate footway and turning head provision. Visibility splays can be readily achieved, by virtue of the straight alignment of the highway.
- 4.1.4 Existing trees and boundary treatments would be ideally retained and managed where possible as part of a site specific landscaping strategy. This commitment would extend to all specified perimeter hedgerows, together with all mature trees. A buffer zone is incorporated between the development and the ancient woodland.
- 4.1.5 It is also acknowledged that an appropriate scheme could comprise affordable dwellings or an element thereof, or indeed that appropriate contributions could be made to support affordable housing provision elsewhere within the Ammanford/Cross Hands Tier 1 Principal Centre.
- 4.1.6 The illustrative layout demonstrates that an appropriate residential scheme can be readily devised for the objection site without any environmental impact or causing harm to any third party interests.

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 readily located within the adjoining Black Lion Road.
- 4.2.2 As regards any potential surface water, roadside gullies and drainage to aid discharge and run-off from the carriageway can be incorporated. 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 is readily achievable and indeed feasible.
- 4.2.3 Due to the objection site's gently sloping nature, at first inspection there are no areas of marshy grassland or water-logging evident, and therefore it appears that the site benefits from efficient rainwater ground percolation.
- 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 any extreme

surface water run-off storm events, which could also allow for additional capacity and acknowledge the potential 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 and capacity issues are not anticipated.
- 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 Capel Hendre

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. *Figure 9* provides an extract showing the data held in respect of land in the locality of the objection site.

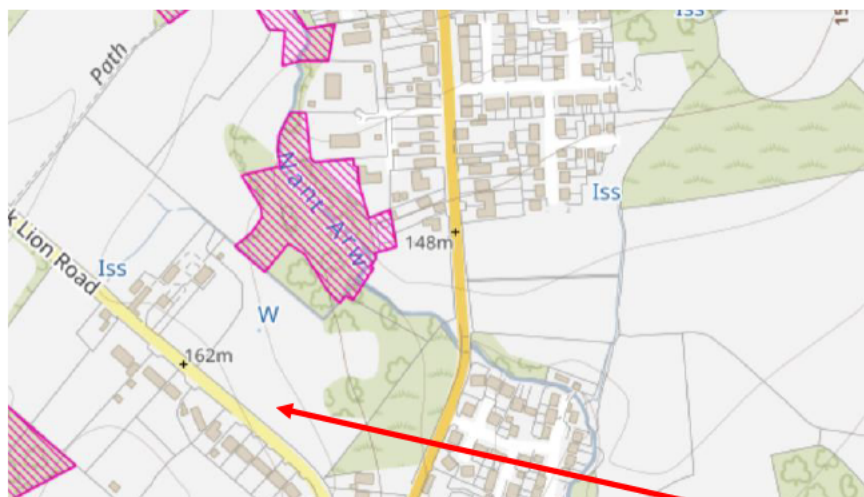


Fig. 9 – DataMapWales ecological data extract in relation to objection site

- 5.1.2 The objection site itself does not contain any national or local nature conservation designation, with no areas of woodland on the site. Any proposed development scheme will fully respect the adjacent area of ancient woodland (purple shading) with the introduction of a protective buffer zone and boundary planting will be managed in accordance with relevant guidance.
- 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 enhancement.
- 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. Any existing boundary hedgerows would be retained as part of the site's wider development.

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- 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 does not contain any listed buildings or scheduled monuments and neither is it in proximity to any historic assets.
- 5.2.3 As a result, the objection site's development would not have any detrimental impact on the setting or interest of any nearby historical 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. 10 – 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.

- 5.3.3 An examination has also been made of DataMapWales and NRW records relating to potential surface water flooding. *Figure 11* shows an extract depicting areas of land in the locality of the objection site which are susceptible to surface water flooding. Surface water arising from the Nant Arw watercourse is sufficiently distant not to affect the site. In the unlikely event that the small area of surface water flooding adjacent to the rear boundary of the site cause any issues, these can be readily addressed.



Fig. 11 – DataMapWales surface water flooding extract in relation to objection site

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.

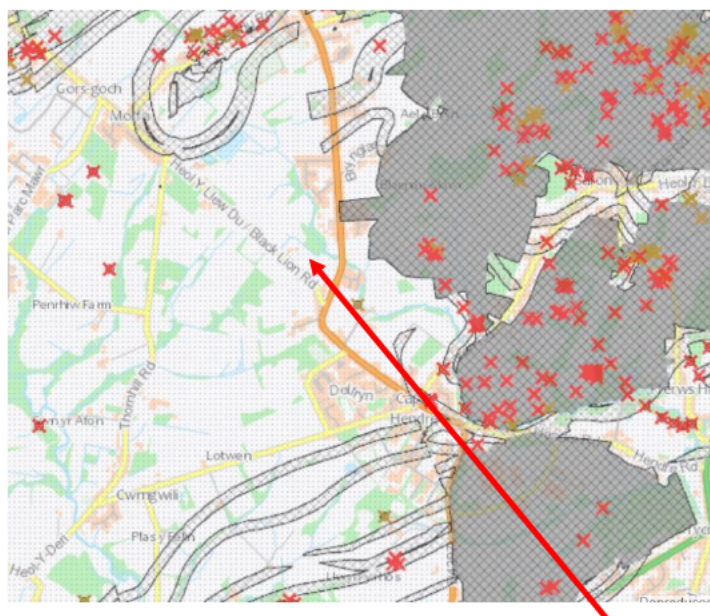


Fig. 12 – Coal Authority extract in relation to objection site

- 5.3.5 The Coal Authority records reveal that the objection site, although lying within the 'Coal Mining Reporting Area', is not itself 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.

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 Capel Hendre 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 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 Capel Hendre 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 Capel Hendre, which is defined as forming part of the Ammanford/Cross Hands Tier 1 Principal Centre 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 The general area is an attractive location for private individuals and small-volume builders due to the proximity of local services and employment opportunities, and the potential availability of development land at reasonable cost.
- 6.3.4 There are no other opportunities for new residential land within Capel Hendre – a situation that needs to be corrected given the strategic employment status afforded by the 2nd Deposit LDP.
- 6.3.5 The fundamental principles of development, as set out within this submission, will enable prospective developers to produce an attractive residential scheme appropriate to the locality.

6.3.6 The objection site reflects the built form and is strategically situated to take full advantage of wider public transport routes.

6.3.7 By way of summary, the objection site at Greenhill Bungalow, Black Lion Road, Capel Hendre, is entirely suitable for residential development for the following reasons:-

Compatibility with adjacent land uses

The majority of the surrounding area comprises residential development – the layout of the objection site will be designed so as to ensure compatibility.

Potential community benefits including affordable housing

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

Site availability and deliverability during the Local Development Plan period

There are no constraints preventing the development's completion. 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 in close proximity to main public transport corridors.

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.

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, scheduled monuments, registered historic parks or landscape parks

There are no historic assets in the locality.

Impact upon conservation areas

There are no conservation areas within the locality.

Impact upon other environmental designations

The site does not form part of any other environmental designation. The adjacent area of ancient woodland will be protected and managed in accordance with relevant guidance.

6.3.8 In addition, the retention and protection of the adjacent ancient woodland and all important trees and hedgerows, will minimise any potential visual impact.

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

6.3.10 By way of emphasis, the objection site:-

- will help sustain the community by providing a choice of accommodation in a sustainable location that reinforces the traditional settlement pattern;
- is of moderate size and is surrounded by existing residential development;
- would not be tantamount to development in the open countryside, as it is largely 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 any potential issues 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 quality dwellings at a sustainable location.

7.0 CONCLUSION

- 7.0.1 This submission has been prepared in order to demonstrate that the development of an area of land at Greenhill Bungalow, Black Lion Road, Capel Hendre, 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 Capel Hendre 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.
- 7.0.4 The objection site represents a sustainable and deliverable opportunity to provide new housing within Capel Hendre – part of the Ammanford/Cross Hands Tier 1 Principal 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 within a convenient walking distance of existing community services and facilities, 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. The under supply of residential land in Capel Hendre needs to be addressed and the development of this site will help to redress this imbalance. It is strongly suggested that the Local Authority closely scrutinises those sites currently allocated in the development plan 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 be given to the inclusion of the objection site within the LDP's development limits for Capel Hendre, thereby allowing the site to come forward during the plan period up to 2033.