



REPRESENTATION STATEMENT

2nd DEPOSIT CARMARTHENSIRE LOCAL DEVELOPMENT PLAN
2018-2033

**LAND AT BRYNAWELON
HEOL PENDREF, LLANGADOG
CARMARTHENSIRE, SA19 9ED**

**On behalf of
Mr. S. Slaymaker**

Our Ref: 0666.b/CLJ/23

Date: March 2023

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OBJECTION SITE: OVERVIEW

This objection submission has been prepared in respect of the 2nd Deposit Carmarthenshire Local Development Plan (LDP) and in order to demonstrate that the development of an area of land at Brynawelon, Heol Pendref, Llangadog, 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 Heol Pendref. The current development guidelines for Llangadog adjoin the objection site. This submission requests that the plan be revised to include this part of Llangadog within the development limits and thus provide for the future housing and community needs of the local area.

In addition, the representation also promotes the development of part of the site for community car parking, which is much-needed within Llangadog. Further positive benefits include community allotment provision and a communal garden area.

1.0 INTRODUCTION

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

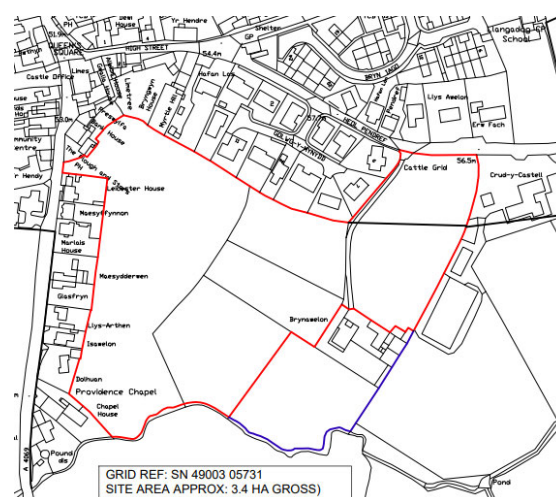


Fig. 1 – Objection site boundary in the context of Llangadog

2.0 SITE CONTEXT

2.1 THE OBJECTION SITE

2.1.1 The objection site and its relationship to Llangadog is shown in the ‘Ordnance Survey’ extract at *Figure 2*.



Fig. 2 – Relationship of objection site to settlement of Llangadog

2.1.2 *Figure 3* provides more detail with a red line identifying the spatial extent of the objection site and a blue line showing additional land ownership. The objection site measures approximately 2.0 ha.



Fig.3 – Objection site boundaries and land ownership

2.1.3 *Figure 4* provides an aerial image of the objection site and its surroundings, clearly demonstrating its ideal location adjacent to existing development and in close proximity to the village centre.



Fig. 3 – Aerial view of objection site in relation to adjacent built form

2.1.4 The objection site is located to the south of the village centre and is directly related to the established built form. The existing Golwg y Mynydd residential development forms the site's northern boundary, together with Heol Pendref, where a portion of the frontage of the objection site has already been included within proposed development limits and comprises a natural and logical infill opportunity within the spatial context of the settlement. The site's western and part eastern boundaries are formed by adjoining residential curtilages of properties in Golwg y Mynydd and those in Church Street. To the south, and the remainder of the east, lies agricultural land.

2.1.5 The general area is characterised by a mix of residential dwelling styles that take advantage of the road frontage aspect, with more recent housing schemes comprising in-depth developments. Part of the objection site is ideally suited to a frontage development where it borders Heol Pendref but the remainder of the site readily lends itself to a more in depth scheme.

2.1.6 The relationship of the objection site to the immediately adjacent highway is shown in *Figures 4 and 5*. For the purposes of this submission, the accompanying illustrative layout (*Figure 8*) shows an access into the site from the immediately adjacent Heol Pendref. 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.



Fig. 4 – Visibility along Heol Pendref towards the east



Fig. 5 – Visibility along Heol Pendref looking west

2.1.7 Only part of the objection site is proposed for residential use, with a number of community focussed features being included within the scheme, such as a village car parking area, a communal garden area, and an area set aside for allotments. An ancillary access direct to the proposed car park from Church Street is also suggested. These positive community elements will be enlarged upon later in this statement.



Fig. 6 – General view of objection site

2.1.8 Topographically, the objection site is gently sloping, measures approximately 2.0ha 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. Any trees that do need felling will be replaced by mitigating tree planting on a ‘three trees for each one felled’ basis.

2.1.9 The development limits in this area reflect the legacy of the incremental development that has occurred in the locality, with dwellings being constructed in ribbon form along the highways. It is evident that through its close physical relationship to the village centre, the development of the objection site will help reinforce the traditional nuclear form of the settlement.

2.1.10 In summary therefore, there is no physical amenity feature within or adjacent to the objection site that will prevent its appropriate future and efficient development.

2.1.11 The provision of community facilities for the benefit of local residents has to be a material consideration.

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

- 2.2.1 The settlement of Llangadog is identified in within the 2nd Deposit LDP as a Tier 2 Service Centre. under strategic policy SP3 ‘Sustainable Distribution – Settlement Framework’. The plan confirms that the majority of development will be directed towards the top tiers of the settlement framework hierarchy, and therefore, by definition, the site’s sustainable development credentials are already formally acknowledged and confirmed.
- 2.2.2 More specifically, in terms of accessibility, Llangadog has regular bus services and is situated within a convenient distance of the larger market towns of Llandeilo and Llandovery, which provide a wide range of facilities and services. Llangadog is also within a convenient distance of Ammanford which provides an extensive range of retail outlets, secondary and tertiary education, healthcare, library, sport/recreation, and employment opportunities.
- 2.2.3 The objection site is ideally and centrally located in terms of walking distance from the centre of Llangadog and proximity to its several retail outlets, including a village shop/post office, public houses and restaurants, together with the village hall, medical surgery, Church and Chapel. Llangadog primary school is also conveniently located to the site.
- 2.2.4 The 280 and 281 Llandovery to Carmarthen bus services provide regular access 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. Llangadog 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. Llangadog enjoys ease of access to the strategic highway network being in close proximity to the main A40 trunk road linking West Wales with Brecon, Abergavenny and further afield.
- 2.2.5 The strong sustainable development credentials of Llangadog should therefore be given full recognition and consideration when determining potential future growth options.
- 2.2.6 It is also important to highlight the fact that several business/commercial developments are situated in Llangadog. The 2nd Deposit LDP continues to promote three existing employment areas at Llangadog under Policy EME1, namely, Station Road, Station Road (North) and the Former Creamery.

- 2.2.6 The fact that Llangadog is recognised as a key employment centre within the 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 Llangadog.
- 2.2.7 *Figure 7* contains an extract from the 2nd Deposit LDP's Proposals Map for Llangadog which shows the spatial strategy proposed for this Tier 2 Service Centre. The existing employment areas are evident to the west of the main settlement (purple shading) with the rail station the focus for this outlying area.



Fig. 7 – 2nd Deposit LDP extract showing planned growth in relation to the objection site

- 2.2.8 In terms of planned residential growth, Llangadog has been afforded three allocations (brown shading) in the 2nd Deposit Plan (SeC17/h1, SeC17/h2 & SeC17/h3) all of which however are on the fringes of the settlement and thereby will contribute towards additional private car usage and exacerbated congestion within the village. The objection site is in a vastly more sustainable location than these residential allocations, particularly SeC17/h2. The other two allocations (SeC17/h1 and SeC17/h3) have been partly constructed and therefore do not constitute a future contribution to the housing supply.
- 2.2.9 The limited potential for appropriate residential development within Llangadog is of concern and any shortfall needs to be addressed. The net result of this lack of residential development sites, coupled with the Local Authority's intention to direct

employment growth to the settlement, means that 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 a lack of local housing. In order to capitalise fully on the sustainability of this Tier 2 Service Centre, readily deliverable residential allocations are required – such as the objection site.

2.2.10 The designation of the objection site as a residential allocation in the forthcoming replacement LDP will assist in addressing this imbalance and will provide a much needed range and choice in terms of residential accommodation within Llangadog.

3.0 NATIONAL PLANNING POLICY CONSIDERATIONS

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

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

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

4.0 THE PROPOSAL

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

4.1 DEVELOPMENT OVERVIEW

4.1.1 It is proposed that the objection site be allocated for residential development in the forthcoming replacement Carmarthenshire Local Development Plan. The accompanying illustrative site layout (reproduced at *Figure 8*) demonstrates that the site is capable of accommodating a modest number of dwellings in a deliverable, efficient and sustainable manner. The illustrative layout indicates an attractive in-depth form of development that fully reflects the existing built form.

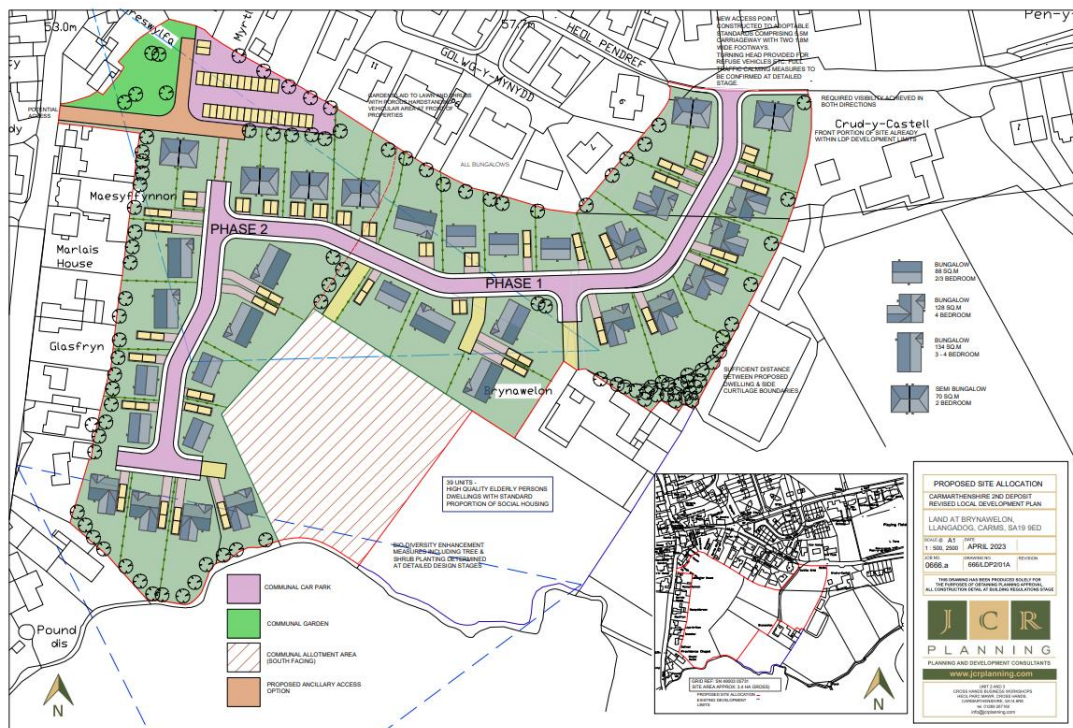


Fig. 8 – Development option for objection site

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- 4.1.2 The objection site is clearly capable of accommodating the proposed 39 no. detached and semi-detached bungalows, with the standard proportion of affordable housing, in a scheme which reflects the existing form and density of residential development in the locality.
- 4.1.3 Although the illustrative scheme suggests a development of ‘elderly persons housing’ (55 years of age plus), of which there is a shortage in the locality, it goes without saying that the objection site can readily accommodate a number of variations on the suggested layout. The suggestion of an elderly persons housing development would provide much needed dedicated and secure accommodation for the local ageing population.
- 4.1.4 The residential element of the scheme would comprise a high quality phased development and would draw on local Welsh vernacular architectural design elements, making every effort to be sustainable, both through the employment of local contractors, the use of local suppliers, and in the long term, through the provision of residential units within convenient walking distance of village services and facilities.
- 4.1.5 It must be emphasised that the proposed scheme does not seek residential development on the entire site but incorporates a number of community benefits. The proposer is keen to offer land for uses that will provide both short and long term benefit to the residents of Llangadog, both in a practical sense and from a more holistic well-being perspective.
- 4.1.6 A key element of the scheme is to offer land for a much needed public car park which is indicated on the accompanying layout drawing as being located immediately adjacent to the village centre. Parking provision is scarce in Llangadog and such a community facility in this prime village centre location would be welcomed and would help alleviate current on-road congestion. A convenient alternative car park access from the A4069 road (Church Street) to serve the car park directly is proposed.
- 4.1.7 Also beneficial to the community is a proposed communal garden amenity area adjacent to the car park, which would provide an area of open greenspace in the village centre. As Llangadog’s centre is quite congested with narrow or indeed a lack of pavements, a quiet green area to sit and meet would provide a safe alternative.
- 4.1.8 A further positive community gain is in the form of an area to be set aside for communal allotments, located towards the southern part of the objection site, which will aid in promoting both physical and mental well-being. There will also be important biodiversity enhancement as a result of the allotments and areas of strategic landscaping throughout the site.

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- 4.1.9 All of these voluntary contributions would result in substantial community benefit and significant gain for Llangadog, not least in terms of well-being and placemaking.
- 4.1.10 With regards to access, it is proposed that the development be served by its own individual means of access direct from Heol Pendref, with appropriate footway and turning head provision. Visibility splays can readily be achieved by virtue of the straight alignment of the highway.
- 4.1.11 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.
- 4.1.12 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 Llangadog or indeed Carmarthenshire.
- 4.1.13 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 those other sites that have been allocated for residential development within Llangadog. The inclusion of this land within revised development limits would 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 (Heol Pendref).
- 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.

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- 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 gain.
- 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 listed buildings in the central part of Llangadog is embedded at *Figure 9*.
- 5.2.2 The objection site itself does not contain any listed buildings. The southernmost point of the site is adjacent to the curtilage of the Grade II listed Providence Independent Chapel. In relatively close proximity to the north-eastern corner of the site are the Grade II listed properties known as ‘The Limes’ and ‘The Limes Shop’. None of these listed buildings or their settings will be affected by the development of the objection site. That part of the site which is closest to The Limes and The Limes Shop is proposed for use as a communal garden amenity area with an adjacent area for car parking. In respect of Providence Chapel, the closest proposed bungalow will be situated sufficiently distant from the curtilage boundary. There are no scheduled ancient monuments (SAM) within or adjoining the site.

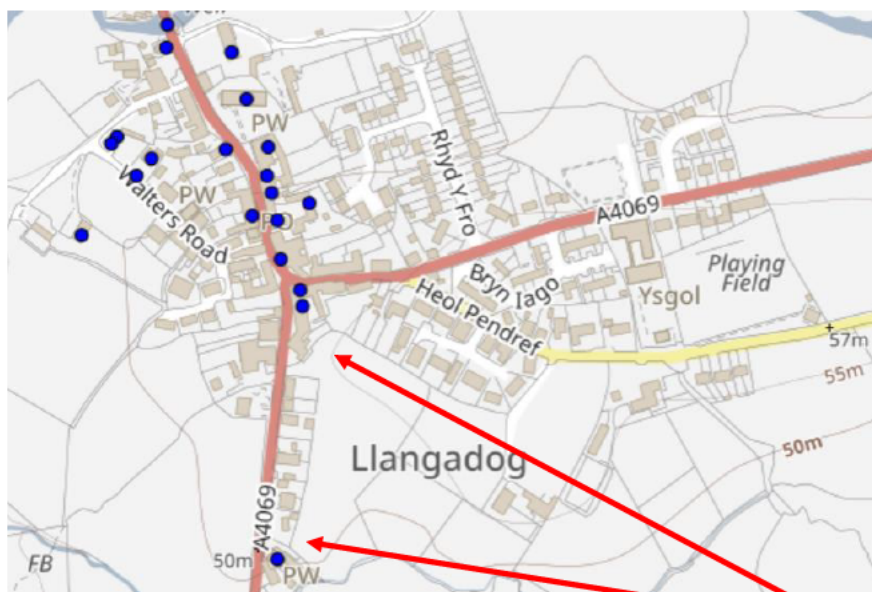


Fig. 9 – DataMapWales extract showing listed buildings in relation to objection site

5.2.3 The objection site is situated adjacent to the Llangadog Conservation Area (Figure 10) and there is a duty to ensure that this historic asset is not harmed by development. The illustrative layout proposed takes full account of the historic status of the conservation area, and in fact enhances its overall character.

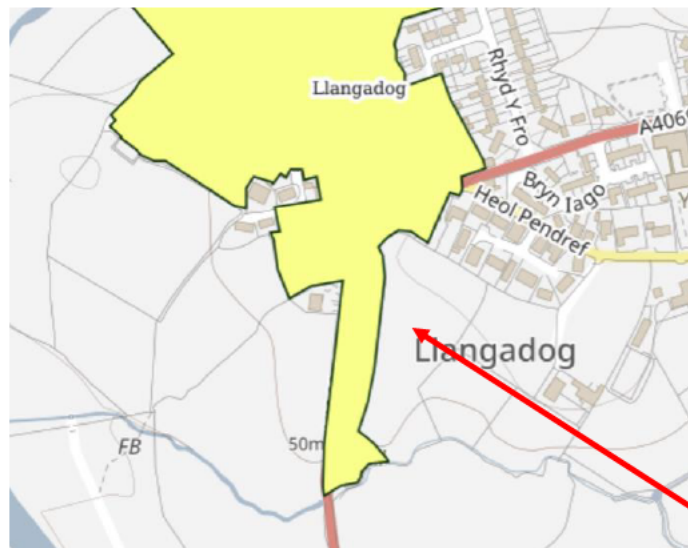


Fig. 10 – DataMapWales extract of Llangadog Conservation Area in relation to objection site

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*). The small area towards the southern perimeter of the objection site that is indicated as being susceptible to surface water flooding is identified in the suggested site layout for allotment use and tree and shrub planting. In the unlikely event that this possible surface water flooding causes any issues, these can be readily addressed.

Potential for Ground Contamination and Coal Mining Activity

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

5.3.5 The Coal Authority's records reveal that the objection site lies 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.

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 Llangadog area, there will be no difficulty in achieving a positive gross development value for this site. It should be noted that more detailed analysis can be provided at the appropriate stage in the LDP process.

6.1 VIABILITY APPRAISAL

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

Costs

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

Sales Values

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

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

6.2 DELIVERABILITY

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

6.3 APPRAISAL

- 6.3.1 The justification for the inclusion of the objection site within the development limits for Llangadog 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 Llangadog, which is defined as a Tier 2 Service Centre in the 2nd Deposit LDP and is therefore regarded as a highly sustainable settlement. The broad principle of residential development is acceptable, given its direct relationship and close proximity to the existing built form.
- 6.3.3 This submission proposes a mixed development of 39 high quality (elderly persons) open market bungalows, with the standard proportion of affordable housing, arranged as 27 detached and 12 semi-detached properties.
- 6.3.4 This equates to a gross development density of 20 units per hectare, which 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 Elsewhere, opportunities for new housing land within Llangadog are limited with the majority of other allocation having been already constructed. The objection site is relatively level, and is within defensible boundaries, immediately adjacent to the development limits of Llangadog, and within a convenient walking distance of nearby services and facilities.
- 6.3.7 The fundamental principles of development, as set out within this submission, will enable developers to produce an attractive scheme with multiple ancillary community benefits, namely, a communal garden amenity area, car parking and allotment provision.
- 6.3.8 The objection site reflects the built form of Llangadog and is strategically situated to take full advantage of wider public transport routes. There are no other suitable areas of land in such proximity to the centre of Llangadog that offer the opportunity to facilitate a high quality residential development.
- 6.3.9 By way of summary, the objection site at Brynawelon, Heol Pendref, is entirely suitable for residential development for the following reasons:-

Compatibility with adjacent land uses

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

Potential community benefits including affordable housing

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

Site availability and deliverability during the Local Development Plan period

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

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

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

Accessibility to public transport

The objection site is located in close proximity to a main public transport corridor and Llangadog has a rail station.

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

There are no flood risk issues.

Impact upon biodiversity, protected sites and species

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

Landscape impact

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

Contaminated land

There are no known land contamination issues.

Impact upon listed buildings, registered historic parks or landscape parks

Whilst there are several listed buildings in proximity to the objection site, 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 but is adjacent to the Llangadog Conservation Area and which has been given full consideration.

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 traditional settlement pattern;
- will provide a communal garden area, public car park facility, and community allotments;
- is of moderate size and is situated adjacent to existing residential development;

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

7.0 CONCLUSION

- 7.0.1 This submission has been prepared in order to demonstrate that the development of an area of land at Brynawelon, Heol Pendref, Llangadog, 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 Llangadog 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, communal garden area and community allotments 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 help reinforce the traditional nuclear built form of the settlement rather than perpetuate ribbon development at the fringes of the village, as is the case with Llangadog’s allocated residential sites.
- 7.0.5 The objection site represents a sustainable and deliverable opportunity to provide new housing within this designated Tier 2 Service Centre. With the site capable of being readily served by utilities, together with an efficient means of access from the adjoining public highway, there are no barriers to its delivery within the early stages of the forthcoming plan.
- 7.0.6 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 2nd Deposit LDP in terms of their suitability and deliverability. National planning policy advises that, in those instances where deliverability is uncertain, such sites should not form part of the replacement Local Development Plan.
- 7.0.8 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;

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