



CANDIDATE SITE SUPPORTING STATEMENT
FOR
REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT
PLAN 2018-2033

LAND OFF CLOS COED DERW, PENYGROES, CARMARTHENSHIRE

On behalf of
Mr D Rourke

Our Ref: 0564.b
Date: August 2018
Prepared by: JDE

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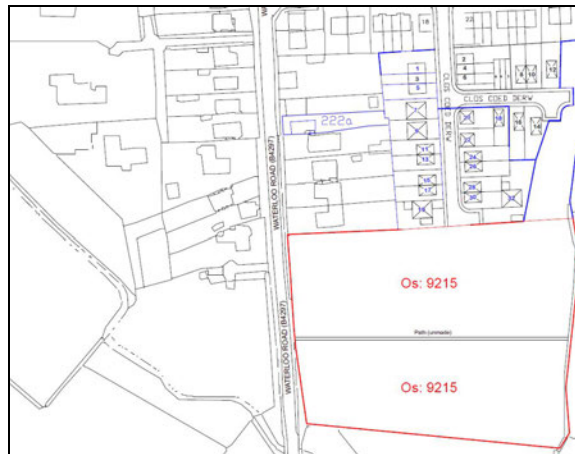
1.0 INTRODUCTION

- 1.1 JCR Planning has been instructed by Mr D Rourke (the Land Owner) to prepare and submit a Candidate Site Supporting Statement for the allocation of land off Clos Coed Derw, Penygroes for the purposes of residential development in the forthcoming replacement Carmarthenshire Local Development Plan.
- 1.2 This Statement has been prepared in line with the Authority's published documents entitled *Revised Carmarthenshire Local Development Plan: Guidance Note* and *Revised Carmarthenshire Local Development Plan: Candidate Site Assessment Methodology*. The contents of this Statement therefore address each point raised within these documents, as well as ensuring that it complies with regards to the guidance and requirements of *Planning Policy Wales (Edition 9)* when it comes to the preparation of development plans and the allocation of land for residential purposes as part of them.
- 1.3 The contents of this Statement therefore provide a comprehensive case for the allocation of the land for residential development purposes and it should also be read in conjunction with the accompanying supporting information and indicative site layout drawing.

2.0 SITE CONTEXT

2.1 THE SITE

2.1.1 The Candidate Site relates to a parcel of land measuring just over 1.2ha, edged in red on the plan below.



Plan A

2.1.2 The Site consists of two undeveloped enclosures separated by a Public Footpath that are in part laid to rough grass, as illustrated in the photographs below.



Photograph 1



Photograph 2

2.1.3 As can be seen, the Site is generally level in nature and undeveloped. All of its boundary features are well defined, consisting of a mix of hedgerows, stock proof fencing and residential boundary treatments. The site contains no water features within it and ground composition we understand has good drainage qualities.

2.1.4 In terms of access, the Site can be accessed directly off a recently constructed residential development to its north via its estate road, but there are also access possibilities to the Site via Waterloo Road to the west, which has a good level of visibility in both directions at this point (see photographs below).

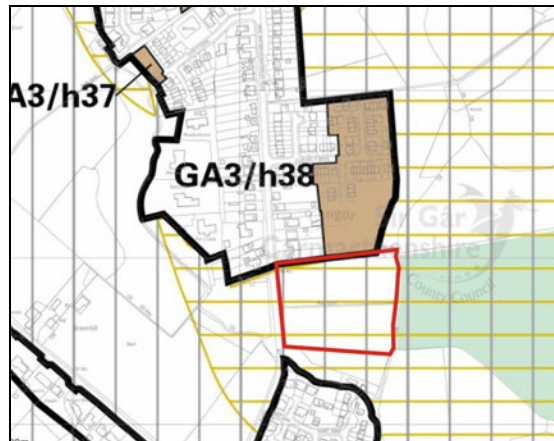


Photograph 3



Photograph 4

2.1.5 Under the provisions of the current Carmarthenshire Local Development Plan, the site adjoins the Development Limits for the settlement of Penygroes, as illustrated in the plan below.



Plan B

2.1.6 As can be seen, the Candidate Site adjoins and is well related to the existing defined Development Limits for Penygroes (including an existing and completed housing allocation) and the settlement and its built form as a whole, when existing residential development directly to its north is taken into consideration. Its position and proposed use therefore represents a natural and logical location for the settlement's expansion.

2.2 THE ADJOINING SETTLEMENT

2.2.1 As detailed above, the Candidate Site adjoins the existing settlement and form of Penygroes. The existing built form and pattern of the settlement follows key access routes, with then further development leading off these in depth, such as the recently completed site to the north of the Candidate Site. The larger town of Ammanford is then located a short distance to Penygroes' south east and Cross Hands to the north west.

2.2.2 The Site is also located a short distance from the settlement's core and within walking distance of all of its community facilities and local services, as well as those offered by the nearby settlement of Capel Hendre, all of which are marked by the blue circles on the map below.



Plan C

2.2.3 Access to further facilities in the larger towns of Ammanford, Llanelli and Cross Hands can then be gained by regular bus services (including numbers 128 and 129), a number of stops for which are within a short walk of the Candidate Site. The strong sustainable position of Penygroes should therefore be given full consideration when considering potential future growth options.

2.2.4 In terms of planned growth, the proposed Candidate Site forms part of one of the 3 identified Growth Areas (GA3) within the current LDP. Within these areas, the majority of the County's growth (particularly with regards to housing) was expected to be accommodated within the Plan period. However, a significant number of the housing allocations within GA3 have yet to be delivered 3 years since the Plan's adoption, particularly within the Amman Valley, of which the Candidate Site forms part.

2.2.5 We understand that this worrying trend has been identified and acknowledged by the Authority through its own assessment of current allocations. In the report to Full Council in January of this year all allocations were categorised as either being 'Red', 'Yellow' or 'Green' in terms of their ability to be delivered, with Red being those considered to be the least deliverable, or not capable of being delivered at all. Table 1

below therefore provides an indication of those sites categorised as being 'Red' by the Authority.

LDP Ref.	Site Name	Units
GA3/h2	Residential Caravan Park, Parc Henry Lane	9
GA3/h4	North of Church Street	27
GA3/h6	Former police station	12
GA3/h7	Viji Garage, High Street	20
GA3/h8	Lon Ger y Coed/ Wernoleu Road	14
GA3/h17	Tirychen Farm	250
GA3/h25	Delfryn Estate	15
GA3/h26	Land adj Llys Newydd Nursing Home	25
GA3/h30	King's Road	22
GA3/h33	Land adj Penygroes Road	17
GA3/h36	Adj Clos y Cwm	12
GA3/h53	Nantydderwen	33

Table 1

2.2.6 From the above table, it is evident that there are a total of 456 'red' units – those considered unlikely to be delivered by the Authority. Whilst it is recognised that some of the above are the subject of implemented consents, the remaining number of units without the benefit of an implemented planning permission continues to be over 440. Whilst this in itself questions their delivery, it should be noted that almost all of the above sites were previously allocated in the Carmarthenshire Unitary Development Plan and so despite being earmarked for development for over 12 years, almost all of the above allocations have failed to deliver any new housing within the identified Growth Area.

2.2.7 The net result of the above is that despite the Growth Area continuing to have a very strong provision of community facilities, local services and public transport connections, its ability to grow and capitalise on these sustainable attributes has been prevented through allocations that have made no contribution to the housing stock since the LDP adoption, and indeed some time before this. The deliverability of the remainder of the aforementioned longstanding allocations are clearly in doubt and so

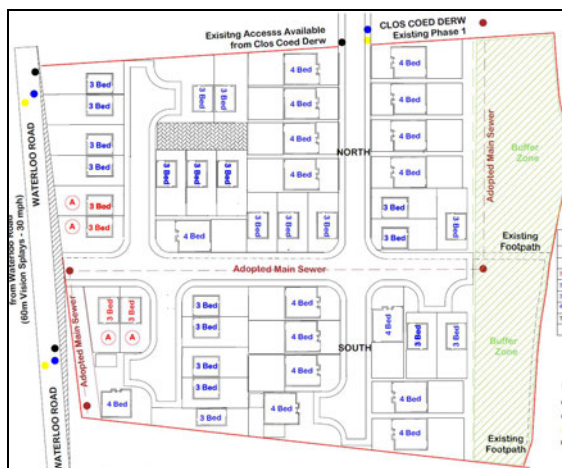
in order to readdress this deficit in provision, and capitalise on the sustainability of the Growth Area, more deliverable residential allocations are required.

3.0 THE PROPOSAL

3.0.1 As part of the requirements for the promotion of sites for residential development, this Statement is accompanied by an indicative layout for a potential residential scheme that could be developed on the site. It should be emphasised that the accompanying layout is for illustrative purposes and that other design solutions for the site could also be reached. Notwithstanding this, the accompanying layout drawing has taken account of all the potential assets and constraints of the site and demonstrates that it is capable of delivering 43 units in a deliverable and sustainable manner. The following information therefore expands on this principle.

3.1 DEVELOPMENT OVERVIEW

3.1.1 It is proposed that the Candidate Site be allocated in the forthcoming replacement LDP for the purposes of 43 residential units. As detailed above, the accompanying illustrative layout (reproduced below) demonstrates that the site is capable of accommodating this number in a deliverable and sustainable manner.



Plan D

3.1.2 As illustrated above, the site is capable of accommodating a mix of unit sizes and types, with the associated density – 43 units – having therefore taken into

consideration this potential mix, as well as striking a balance of being reflective of the existing form and density of residential development in the immediate locality.

3.1.3 With regards then to access, it is proposed that the Candidate Site would be served by an access that would form a continuation of the existing estate road serving the recently constructed housing development to its south. In addition, the new estate road serving the Site could also then proceed to link up with Waterloo Road in the manner shown on Plan D.

3.1.4 Due to the proximity of existing facilities the proposal does not include any formal areas of open space. It is recognised and supported that an element of the proposed units would be affordable in nature, which under the provisions of the current LDP would be in the region of 10%.

3.2 INFRASTRUCTURE CONSIDERATIONS

3.2.1 Any development of the Candidate Site for residential units would be served by mains water, public sewer and electricity, connections to which either lie within the site or in the adjoining stretch of aforementioned newly constructed estate road serving the adjoining residential development.

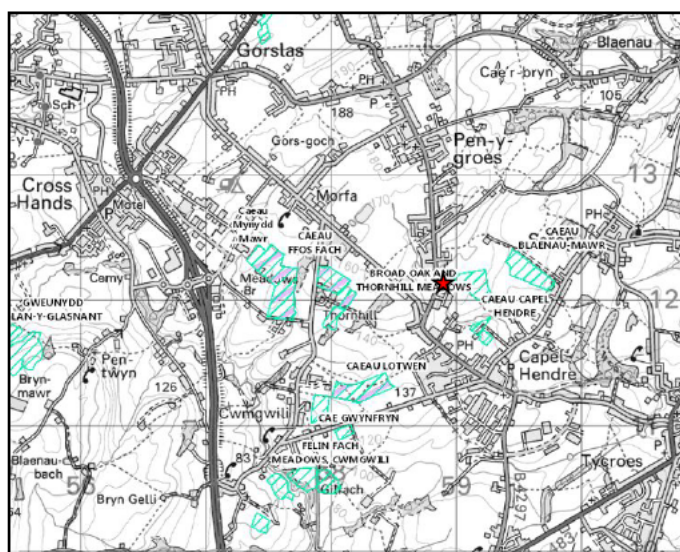
3.2.2 With regards then to surface water, it is considered that as a result of on-site features, there would be a number of options available to any development of the site in terms of its disposal.

4.0 ENVIRONMENTAL CONSIDERATIONS

4.1 ECOLOGICAL ATTRIBUTES

4.1.1 Any potential biodiversity assets the Site may include have been given full consideration with regards to exploring its potential for residential development. This has included the proposed retention and management of existing hedgerow features forming part of the Land Owners wider ownership, as well as an element in line with the recommendations for the accompanying Ecological Appraisal Report.

4.1.2 The site does not form part of any local or national nature conservation designation, but does adjoin one – SSSI. However, as has been shown through the development of the land directly to the north of the Site and also the accompanying ecological report, the development of the Candidate Site could be delivered without detriment to this ecological interest. In the wider content, there are then 8 further SSSI designations and 1 SAC designation within 3km of the Candidate Site (red star on Plan E), who's locations are illustrated on the plan below.



Plan E

4.1.3 Notwithstanding the above, it is considered that due to the separation distance from these designations and the Candidate Site, together with intervening topography

(including existing residential development) that these factors will ensure that its development would have no detrimental impact on them.

4.2 HISTORICAL ASSETS

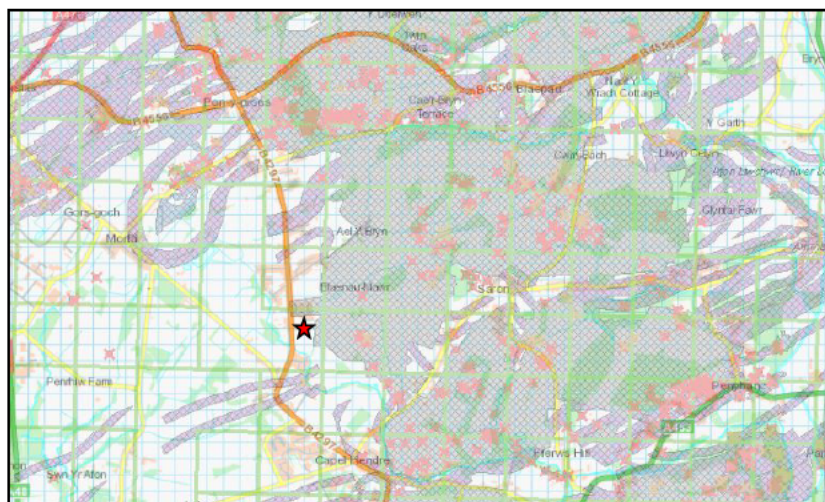
4.2.1 Neither the Candidate Site or adjoining settlement includes any Listed Buildings or Conservation Areas. In addition, there are no Scheduled Ancient Monuments (SAM) within or adjoining the Candidate Site. As a result, the development of the Site would not have any detrimental impact on the setting or interest of any nearby historical asset.

4.3 ENVIRONMENTAL CONSTRAINTS

4.3.1 The Candidate Site is not categorised as being at risk of flooding in terms of the Development Advice Maps or those produced by Natural Resources Wales.

4.3.2 Due to its greenfield nature and agricultural use, the Candidate Site has no ground contamination related constraints.

4.3.3 Whilst many areas in the locality have been the subject of mining in the past, Plan F below (obtained from the Coal Authority) shows that the Candidate Site (marked with a red star) has no known surface or underground workings, or mine entries or associated ventilation shafts within it.



Plan F

4.3.4 As a result, the Site has no ground stability related constraints to its proposed development

5.0 VIABILITY

- 5.1.1 As part of the preparation of any development plan, it is vital to ensure that allocations within it are both viable and deliverable. To not make efforts to explore both these aspects is to then risk that the Plan may be unsound and so in turn fail to meet its own targets or objectives.
- 5.1.2 Although detailed viability appraisals are difficult to prepare at this stage of the Plan's preparation due to the absence of, for example, such things as full engineering details, it is possible to undertake such appraisals at a strategic or in-principle level. This Statement is therefore accompanied by a suitably detailed appraisal that provides sufficient evidence at this stage to show the development of the Site is both viable and deliverable.
- 5.1.3 In terms of a delivery timescale, with a developer secured, it is envisaged that the site could be capable of being completed within 5 years from the adoption of the replacement LDP, as well as in a phased manner within this time period.

6.0 NATIONAL PLANNING POLICY CONSIDERATIONS

6.1.1 In the preparation of any development plan, consideration must be given to national planning policy and guidance. At present, this takes the form of *Planning Policy Wales (Edition 9)* and a series of *Technical Advice Notes (TAN)* that deal with a range of topic areas.

6.1.2 With regards to residential development, or housing, the overarching requirements and principle guidance set by national policy can be found at Paragraph 9.2.3, which reads as follows:

“Local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types.”

6.1.3 At present, Carmarthenshire County Council’s housing supply figure is below the required 5 year level and so it is imperative that this is addressed as quickly as possible to avoid further deterioration of communities and the facilities and services they have to offer. The instigation of the review of the LDP will form part of addressing this issue, but only if truly sustainable and deliverable allocations are identified and allocated, to replace many of the failing sites that currently form part of the Authority housing and growth strategy for the County, as set out by the current LDP.

6.1.4 Dealing specifically with the Candidate Site subject of this report, it is evident that its inclusion within the replacement LDP would adhere to the requirements of Paragraph

9.2.3, in that it is free from any planning, physical or ownership constraint. In addition, as shown at Section 5 of this Statement, the site is also economically viable in deliverability terms.

6.1.5 Paragraph 9.2.9 then provides Authorities with more specific guidance in selecting sites for allocation for residential development and in terms of the Candidate Site, it is considered that it satisfies all relevant criteria, including the following:

- The location of the Candidate Site is sustainable in terms of its proximity to a range of community facilities, local services and public transport services.
- The physical and social infrastructure of the settlement is capable of accommodating the proposed development without detriment to any interest.
- The Candidate Site is not subject to any physical constraint such as flood risk, ground instability, ecological interest, historic assets or contamination that would prevent its delivery.
- The development of the site for residential purposes would be compatible with existing adjoining land uses.

6.1.6 In summary therefore, the allocation of the Candidate Site adheres and supports the objective, principles and requirements of national planning policy.

7.0 CONCLUSION

- 7.1.1 Although currently undeveloped, the Candidate Site forms a logical extension to the existing settlement, being well related to it and being positioned at a location within the wider landscape to not form a prominent or logical part of the surrounding open countryside. The Site also represents a logical subsequent phase of the adjoining recently constructed residential development, which in itself sustains the argument of the Site's deliverability and viability.
- 7.1.2 In addition to the above, the Site lies within close proximity and walking distance of the existing community services and local facilities of the adjoining settlement, which will ensure it makes a positive contribution to both national and local sustainable development objectives.
- 7.1.3 From a wider sense, the Site also benefits from well served excellent public transport links to the nearby settlements, the larger towns of Ammanford and Cross Hands, together with other locations within and adjoining the County, further increasing the facilities and services available to future residents of the Site via sustainable transport means. In tandem to this, the development of the Site will in turn ensure a deliverable source of future housing for the settlement and Growth Area in which it lies, which has seen a dangerous level of under supply prior to and since the adoption of the current LDP. The development of the Site will help to redress this imbalance and it is strongly suggested that the Authority closely scrutinises those sites currently allocated in the LDP in terms of their suitability and deliverability if it is to continue to allocate them. National planning policy however would suggest that in view of the uncertainty in relation to their delivery, such sites should not form part of the replacement LDP.
- 7.1.4 With the Candidate Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if

allocated is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable candidate for future housing development.

7.1.5 In view of the above and information provided in this Statement, it is respectfully requested that the Candidate Site in question be designated for residential development.