



ALTERNATIVE ALLOCATION REPORT
FOR
REPLACEMENT CARMARTHENSHIRE LOCAL DEVELOPMENT
PLAN 2018-2033

LAND ADJOINING CILLEFWR INDUSTRIAL ESTATE,
CARMARTHEN

on behalf of
Mrs N Andreu and Mr A Davies

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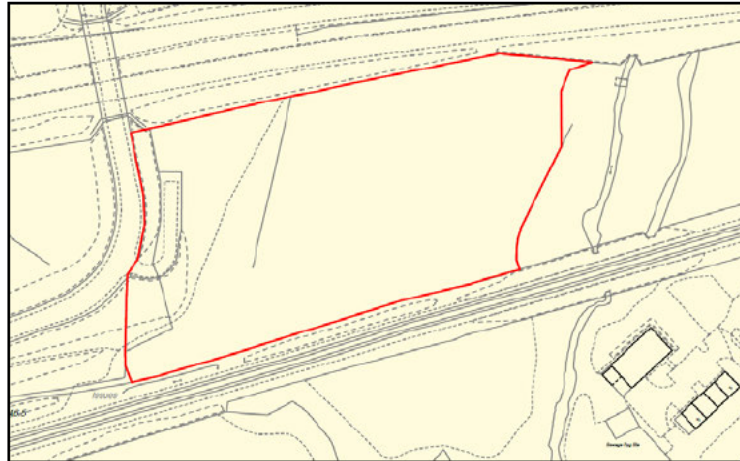
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1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. has been instructed by Mrs N Andreu and Mr A Davies to prepare and submit an Alternative Allocation Report for the allocation of land at adjoining Cillefwr Industrial Estate, Carmarthen for the purposes of employment related development in the forthcoming replacement *Carmarthenshire Local Development Plan* (LDP).
- 1.2 This statement has been prepared in line with the Authority's published site assessment and selection documents. 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 11)* 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 information and indicative drawing package, as well as a sustainability assessment undertaken in-line with the Authority's requirements.

2.1 THE SITE AND CURRENT CONTEXT

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Plan A



Photograph 1

- 2.1.2 The Site currently consists of two parcels of level land, currently laid to grass, as can be seen from the photograph below.



Photograph 2

- 2.1.3 Within the Site are a line of mature trees, which form part of the boundary treatment between the two parcels of the Site. Further trees are then found along the Site's edges, contributing towards its boundary treatment together with stock proof fencing. Just beyond its boundaries then lies the A40 trunk road to the north, St Clears Road along its western boundary and the Carmarthen to Tenby rail line along its southern boundary. Its remaining western boundary is then shared a small strip of woodland owned by our Clients, with a further parcel of grazing land located beyond it.
- 2.1.4 Access to the Site is gained directly off St Clears Road via an existing gateway and access ramp into the Site. As illustrated by the photographs below, visibility in both directions at this point is good.

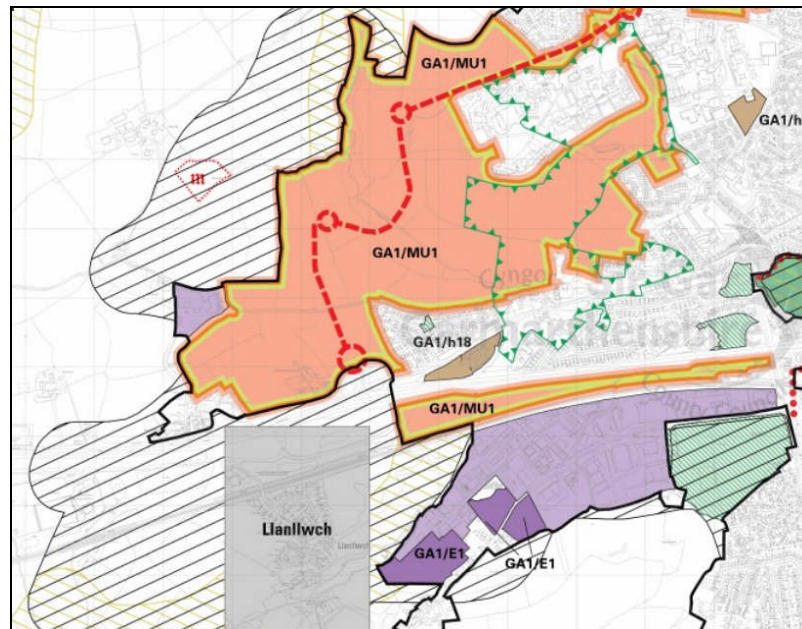


Photograph 3



Photograph 4

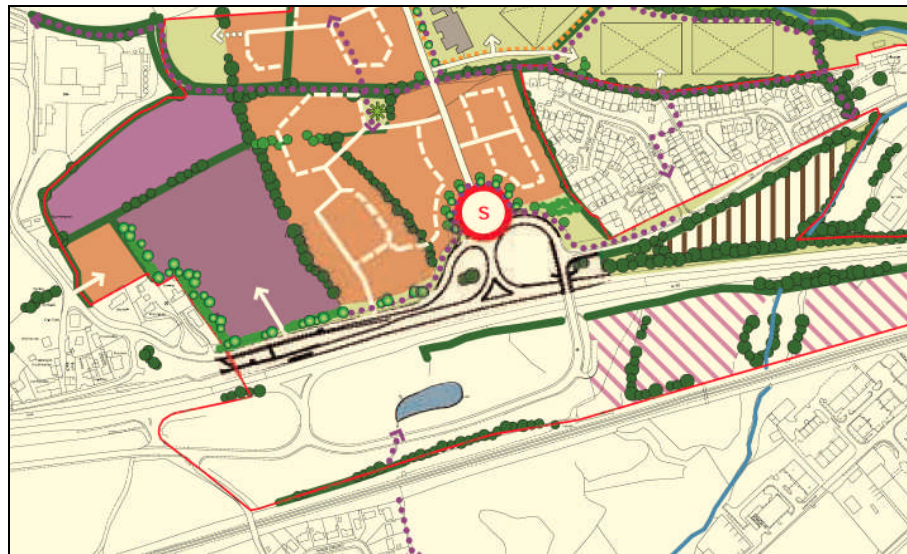
2.1.5 Under the provisions of the current Carmarthenshire LDP, the Site presently forms part of the larger 'West Carmarthen' strategic site allocation, as illustrated below.



Plan B

2.1.6 The LDP Written Statement sets out that the allocation was expected to deliver a mix of uses, including residential and employment related development. The Written Statement is then supported by a comprehensive Supplementary Planning Guidance document, within which two areas are indicated as being earmarked for employment

development – land shaded purple and hatched red (our Clients land) – as illustrated in the plan below.



Plan C

2.1.7 As can be seen, the Alternative Allocation is well related to the existing and proposed development form of the adjoining urban area and therefore continues to represent a natural and logical location for the settlement's expansion.

2.2 THE ADJOINING SETTLEMENT

2.2.1 As detailed above, the Alternative Allocation adjoins the existing built form of the settlement of Carmarthen. Adjoining both its northern and southern boundaries are two of the Town's key transport arteries, with existing residential and employment development beyond them.

2.2.2 Due to this position and close association with the existing built form, the Alternative Allocation has excellent access to the range of community facilities and local services the settlement of Carmarthen has to offer, with a number being within walking distance of the Site. In addition, the Site is positioned directly off a key transport node

of the A40 Trunk Road, providing access to and from it in both an immediate and regional sense.

2.2.3 This excellent level of accessibility is further heightened by the fact that there is a Parc and Ride facility a short distance to the west of the Site, as well as a number of bus stops served regularly by services providing access to the Town Centre and beyond. The strong sustainable position of the Alternative Allocation should therefore be given full consideration when considering potential future growth options.

2.2.4 In terms of planned growth, the proposed Alternative Allocation forms part of one of the 3 identified Principal Centres within the 2nd Deposit LDP, in fact its largest - Carmarthen. Within these areas, the majority of the County's growth (particularly with regards to employment) is expected to be accommodated within the Plan period.

2.2.5 Having undertaken a comprehensive review of the proposed allocations put forward by the 2nd Deposit LDP for the Principal Centre in question, as well as those sites currently allocated for employment development in the current LDP, we have identified a number of significant concerns. The table below therefore provides details of the current and proposed allocations for new employment development.

Current LDP			2nd Deposit LDP		
Site Reference	Site Name	Site Area (Ha)	Site Reference	Site Name	Site Area (Ha)
GA1/E1	Cillefwr Industrial Estate	4.38	PrC1/E1 (i)	Land West of Cillefwr Road	2
GA1/MU1	West Carmarthen	5.45	PrC1/E1 (ii)	Land North of Alltynap Road	1.215
GA1/MU2	Pibwrlwyd	15.5	PrC1/E1 (iii)	Land South of Alltynap Road	0.952
			PrC1/MU1	West Carmarthen	4.53
			PrC1/MU2	Pibwrlwyd	8.95
			PrC1/SS1	Yr Egin	1.04
Total:		25.33	Total:		18.687

Table 1

- 2.2.6 The first and most concerning issue highlighted from the above figures is that the Replacement LDP proposes that the land available for employment development purposes and so economic growth in Carmarthen Town during the Plan period be **reduced** by almost 7ha – over 25% compared to current provision. This is a significant reduction from the role the County Town was considered to have in the County's economy since the adoption of the current LDP, despite the Town's current population and the Replacement LDPs aspirations for its growth. This imbalance is clearly unsustainable.
- 2.2.7 The above is of further concern when the overall allocation of employment land within the County is considered. Under the provisions of Policy SP 7, the 2nd Deposit LDP advises that 71.21 ha of land is to be allocated within the County during the Plan period for employment development purposes. As a result and despite its strategic and sustainable position, approximately only 25% of the total land allocated in the Replacement LDP is to be positioned within the County Town. This imbalance again is clearly unsustainable, particularly when its sustainable transport attributes are taken into consideration.
- 2.2.8 As a result of the above, it is considered that further land such as the Site owned by our Clients should be allocated for employment development purposes to address the above highlighted imbalance, to ensure the Plan can be regarded as being 'sound'.

3.0 THE PROPOSAL

3.0.1 As part of the requirements for the promotion of sites for employment development, this Statement is accompanied by an indicative layout for a potential employment development 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, as well as current Authority design guidance, and demonstrates that it is capable of delivering a mix of 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 employment development, together with areas to be retained and managed for biodiversity enhancement purposes. As a result, the accompanying illustrative layout (reproduced below) demonstrates that the Site is capable of accommodating a range of new employment units to serve a variety of B1, B2 and B8 end-users, as well as its biodiversity assets.



Plan D

3.1.2 As illustrated above, the Site is capable of accommodating a mix of unit sizes and types, ensuring that it is responsive to all existing and future needs of the businesses in the local and wider area.

3.1.3 With regards then to access, the existing point off St Clears Road will be utilised and altered if required. From this then, a new access road will be constructed to serve the Site as a whole.

3.2 INFRASTRUCTURE CONSIDERATIONS

3.2.1 Any development of the Candidate Site for employment units would be served by mains water, public sewer and electricity, connections to which we understand lie within or in close proximity to the Site.

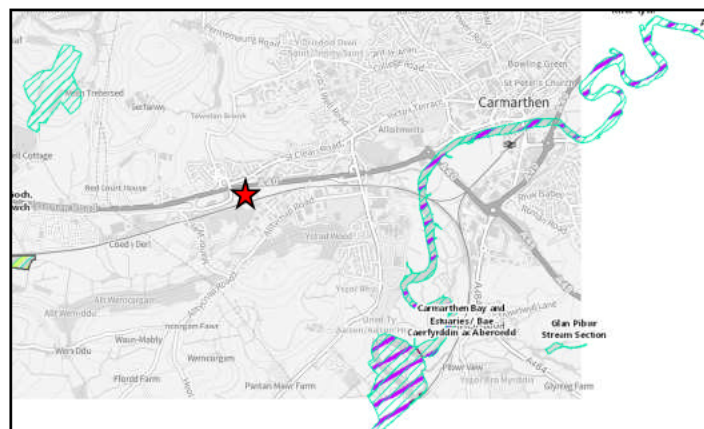
3.2.2 With regards then to surface water, it is considered that as a result of on-site features, there would be a number of options available to any development of the site in terms of its disposal, ensuring its development adheres to current regulatory requirements.

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 employment development. This has included the proposed retention and management of existing site boundary features.

4.1.2 The Alternative Site has been assessed against data held on the “Magic” website which details statutory and non-statutory National and Local sites of ecological importance. Plan E below provides an extract of those records applied to the Carmarthen locality. The red star denotes the position of the Alternative Site.

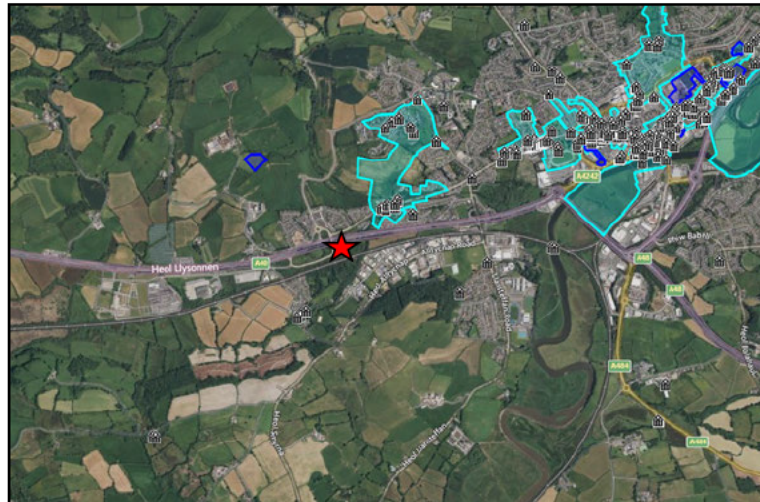


Plan E

4.1.3 As can be seen from the above, the Alternative Allocation does not form part of and neither is it near any national or local designations. The nearest designation is the River Tywi SSSI/SAC, but due to the intervening distance and topography, the development of the Alternative Allocation will not have any detrimental impact on this feature.

4.2 HISTORICAL ASSETS

- 4.2.1 Below is an extract from the 'Archwilio' website that represents a resource for the Historic Environment Records of Wales, with the Alternative Allocation indicated by a red star.

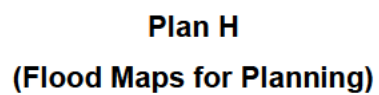
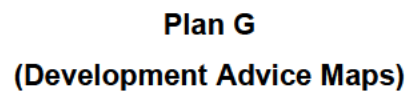


Plan F

- 4.2.2 As can be seen, neither the Alternative Site nor immediately adjoining element of the settlement includes any Scheduled Ancient Monuments, Listed Buildings or Conservation Area's. 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 area of the Alternative Allocation would not include any elements at risk of flooding in terms of the Development Advice Maps or those produced by Natural Resources Wales, as illustrated by the plans below (Alternative Allocation indicated by the red star).



4.3.2 Due to its greenfield nature, the Alternative Allocation has no ground contamination related constraints.

5.0 NATIONAL PLANNING POLICY CONSIDERATIONS

- 5.0.1 In the preparation of any development plan, consideration must be given to national policy and guidance. At present, this takes the form of *Planning Policy Wales* (PPW) (Edition 11) and a series of Technical Advice Notes (TAN) that deal with a range of topic areas.

5.1 EMPLOYMENT LAND SUPPLY

- 5.1.1 With regards to the provision of land for employment use, Paragraph 5.4.1 of PPW sets out that “*The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic use.*”. Paragraph 5.4.3 goes on then to require that:

“Planning authorities should support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level. Development plans should identify employment land requirements, allocate an appropriate mix of sites to meet need and provide a framework for the protection of existing employment sites.”.

- 5.1.2 As detailed in previous sections of this Statement, the Replacement LDP proposes a significant reduction in the level of land available to accommodate employment development in the Town of Carmarthen during the Plan period. On a local level, the Replacement LDP proposes a significant growth in the Town's population through the proposed housing allocations. However, and despite this, the same document proposes a reduction of over 25% of the land available for new job opportunities to this new element of its population.
- 5.1.3 From a wider and more strategic perspective, Carmarthen represents the County's principal settlement that has a range of transport links to all areas of the County, the M4 corridor and the key transport arteries to the commercial ports of Pembrokeshire.

Again, despite these sustainable attributes, only 25% of the total land allocated for employment development in the County is proposed to be located at Carmarthen.

- 5.1.4 The above imbalances are clearly at odds with the guidance and objectives of national planning policy in terms of both local and national growth. In contrast and quite clearly, the allocation of the Alternative Allocation for employment development would help address these imbalances, through the provision of a deliverable and sustainable new source of economic land.

6.0 CONCLUSION

- 6.1 Although currently undeveloped, the Alternative Allocation forms a logical extension to an 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.
- 6.2 In addition to the above, the Site lies on part of the County Borough's key transportation network and is accessible not only by private vehicle, but also by the regularly served public transport network. This provides it with a good level of access for potential customers and employees from the settlement of Carmarthen, as well as those further afield, ensuring therefore that the Alternative Allocation will make a positive contribution to both national and local sustainable development objectives.
- 6.3 In tandem to the above, the development of the Site will also address the imbalances in employment land provision identified in this report, not only in terms of the local area, but also in terms of a County wide perspective. Carmarthen represents the County's key settlement, but the current employment land provisions are not capitalising or strengthening this role, in direct conflict therefore with the objectives of the Replacement LDP.
- 6.4 With the Alternative Allocation 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 employment development.
- 6.5 In view of the above and information provided in this Statement, it is respectfully requested that the Alternative Allocation in question be designated for employment development.