



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

LAND OFF DOLAU FAN, BURRY PORT

On behalf of
Mr. G. Edwards

Our Ref: 1408b
Date: March 2023
Prepared by: Richard Banks

Email: [REDACTED]

Tel: [REDACTED]

Web: www.evansbanks.com

INTRODUCTION

1.1 Evans Banks Planning has been instructed by Mr. G. Edwards (the Landowner) to prepare and submit an Alternative Site Supporting Statement for the allocation of land off Dolau Fan, Burry Port for the purposes of residential development in the 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 the set criteria, determining issues and each qualifying point raised within these documents

Consideration has also been given to ensuring that this formal submission complies with the guidance and requirements of *Planning Policy Wales (Edition 11)*, in relation to the preparation of development plans and the allocation of land for residential purposes as part of that preparation process.

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 plan.

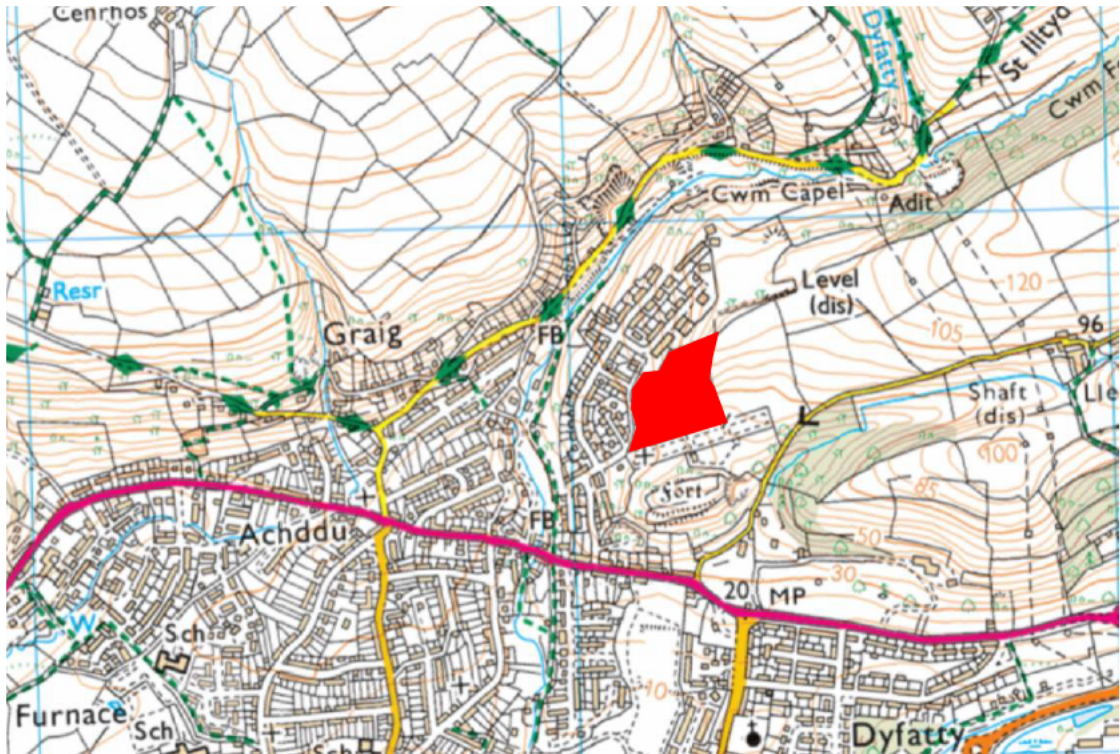
2.0 SITE CONTEXT

2.1 THE SITE

- 2.1.1 The Alternative Site relates to part of a gently sloping semi-improved grazing enclosure which lies off Dolau Fan in Burry Port. The land extends to several acres of pasture which rise in ground profile in a northerly direction. The southern perimeter of the site is linear in form and forms the common boundary with the town's public cemetery, which is also accessed via Dolau Fan.
- 2.1.2 The entire western boundary of the site lies parallel with the rear boundaries of bungalows and houses at Dolau Fan, which forms a series of cul-de-sacs set upon the mid-hillslopes overlooking the northern extent of the town. Properties tend to date from the late 1960s / 70s, and be a mix of semi-detached bungalows and houses, and are conspicuously set in modest plots with side driveways and pockets of front curtilages.
- 2.1.3 The eastern perimeter of the site falls against a post and rail fence with adjoining grazing pasture, which also falls in ground level down to the large open cemetery. The Alternative Site exhibits pockets of individual trees, and swathes of gorse, together with bramble and common scrub.
- 2.1.4 The Alternative Site relates to some 2.1 hectares (2.4 acres) of unmanaged pasture. The site extends across a common boundary length with Dolau Fan properties of some 250 metres, and a shared southern boundary with the cemetery of 190 metres. The site is open and exposed to that cemetery, but the western perimeter with Dolau fan is marked with high, domestic fencing and garden hedgerows.
- 2.1.5 This part of Burry Port is characterised by modern housing, set over several hectares of sloping land, with cul-de-sacs branching out to terminate at open pasture such as the Alternative Site. There is no formal turning head off the eastern extremity of the estate road which provides access to the site, where the road stops abruptly at a shallow embankment.

Dolau Fan extends north off a road junction with the A484 Colby Road, being the main arterial highway running east to west through Burry Port from Pwll and Pembrey. The road is wide, easily allowing continued passage for two-way traffic. Public footways are to be found off both flanks, with street lighting at consistent intervals.

- 2.1.6 The Site field parcel is identified by being edged in red on the plans below. Plan A illustrates their wider position with the settlement of Burry Port. Plan B provides a detailed Ordnance Survey map extract with the site perimeters identified.



Plan A – wider view of Dolau Fan setting in Burry Port



Plan B – detailed Ordnance Survey location plan of site

2.1.7 The Alternative Site development will form a mirrored extension to Dolau Fan properties, appearing as an extension of the cul-de-sac arrangement, set back to provide an abundance of habitable spatial relief to the rear elevations and gardens of those established properties, whilst also allowing for each new dwelling to be afforded off-road car parking and traditional rear garden space.

Plan C below provides a Google Earth image of the site and its surroundings, in which the above physical features are readily apparent.



Plan C – Google Earth – April 2021

2.1.8 The Candidate Site's well-defined perimeters and immediate proximity to the adjacent established residential properties off the Dolau Fan highway, are shown within the photographs below. The photos also depict the existing boundary fences separating the subject field and Dolau Fan properties' rear gardens with the Alternative Site.



Photograph 1 – view of Alternative Site with existing dwelling set in backdrop at Dolau Fan at higher level



Photograph 2 – view from within site entrance looking at Dolau Fan properties across overgrown scrub



Photograph 3 – view of properties at Dolau Fan and two-way width of estate road with footways



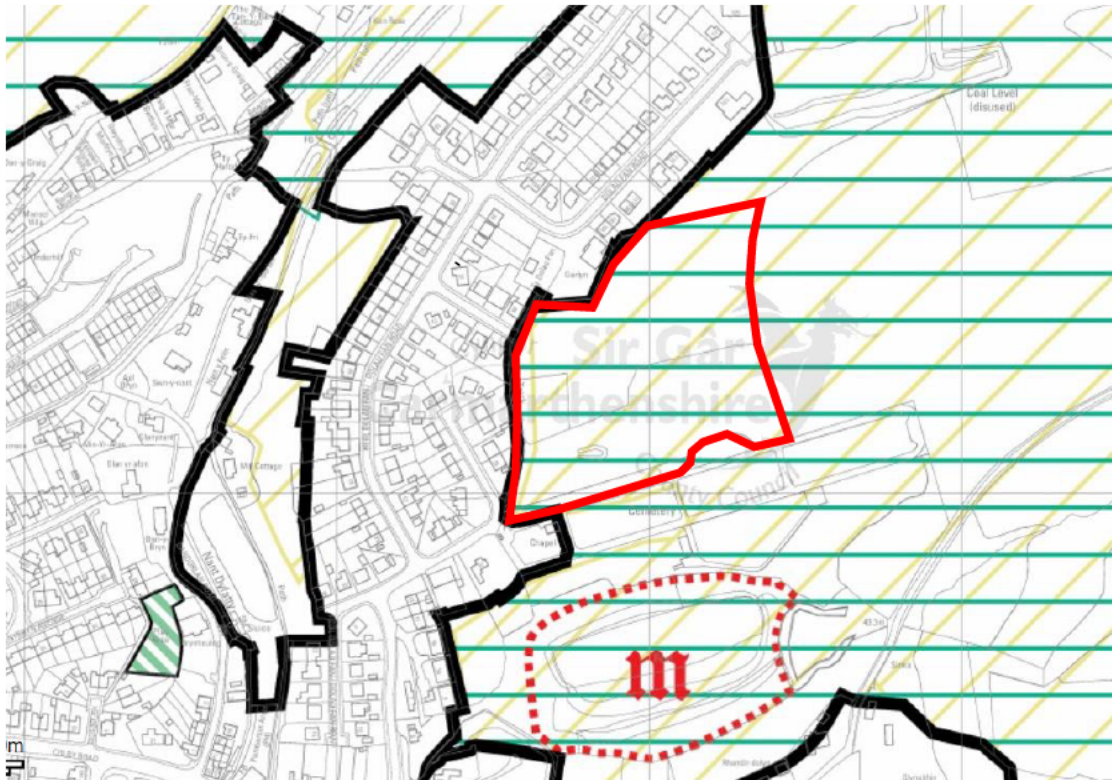
Photograph 4 – view of site from lower ground at southern perimeter with cemetery



Photograph 5 – view at cemetery entrance of site gently ascending hillside and adjoining Dolau Fan properties

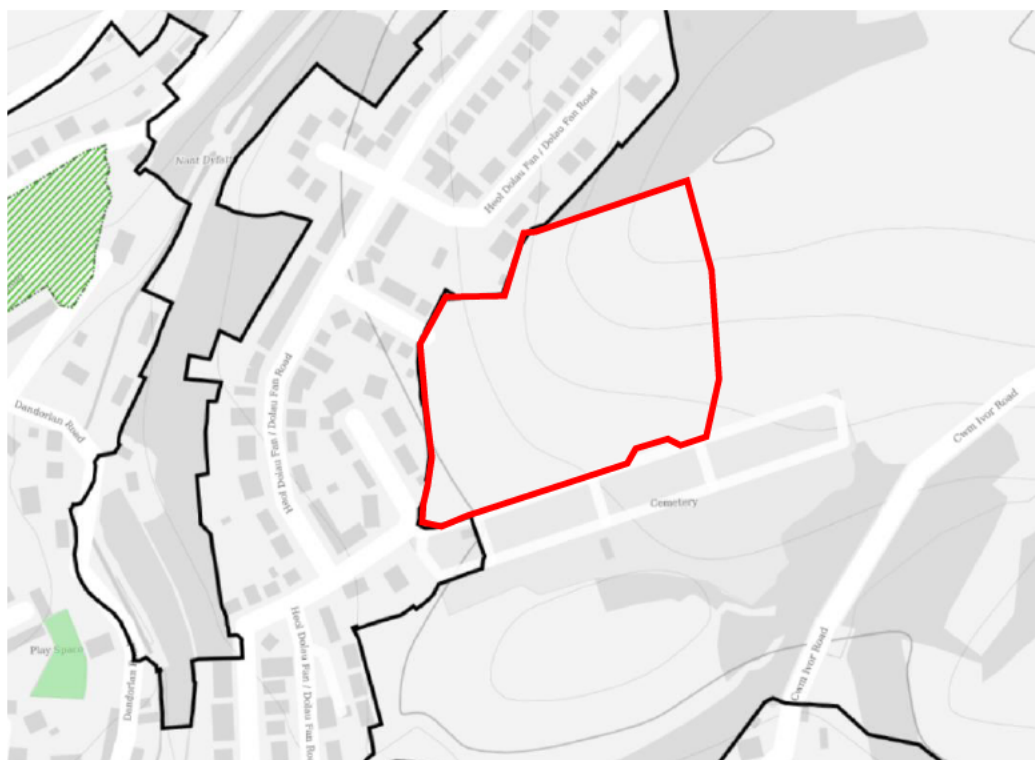
2.2 SETTLEMENT SUSTAINABILITY AND SITE SETTING WITHIN CURRENT LOCAL DEVELOPMENT PLAN

2.2.1 Under the provisions of the current Carmarthenshire Local Development Plan, the site off Dolau Fan falls adjoining the Development Limits for the settlement of Burry Port. The Alternative site is edged in red on the map extract.



Plan D – Extract from Adopted LDP Proposals Map of Burry Port (2014)

2.2.2 As can be seen, the Candidate Site adjoins and is well related to the existing defined Development Limits for Burry Port, and also within walking distance of the town centre. Within the Second Draft of the Deposit LDP for the Plan Period 2018-2033, the settlement limits of this part of Burry Port remain unchanged, as shown in Plan E below.



Plan E – Second Draft of Proposals Map (2023) at Dolau Fan

2.2.3 A notable change in the adopted and emerging LDP Plans is that land to the east at “Bay View, The Graig” allocated in the 2014 adopted plan as T2/1/h4 is no longer allocated in the new Replacement LDP. The site did not come forward for development in the last 8 years, and therefore it has been decided to remove the allocation BUT retain the land within defined settlement limits. **It nevertheless demonstrates that the Council will consider development upon the mid-hillslopes, adjoining established residential properties set at an elevated higher level at Dolau Fan.**

2.2.4 Housing Land Availability in Burry Port

It is clear that proposed residential land opportunities in Burry Port have been rationalised since the current LDP was adopted in 2014. The Second Deposit Draft itemises at Policy HOM1 that only three sites are allocated for residential development, **and two of those are substantially if not totally complete.**

The site at Goodig for 105 units is complete, apart from 8 units off its eastern perimeter, which are in process of being finalised. At Glanmor Terrace, a total of 32 affordable units have been largely completed adjacent to the main railway line.

In terms of the remaining allocation at Harbourside, the site is allocated for 364 units, yet despite being granted outline planning permission, which has since expired and been renewed, there remains no active housebuilder interested in acquiring the site, and it must be accordingly questioned as to the deliverability of tis brownfield site. Being

brownfield the site is susceptible to the need for wholesale remediation which will inevitably lead to increased build costs, undermining its progress.

| Burry Port | | |
|------------|------------------------|-----|
| SeC4/h1 | Gwdig Farm | 105 |
| SeC4/h2 | Burry Port Harbourside | 364 |
| SeC4/h3 | *Glanmor Terrace | 32 |

2.2.5 Conversely, the Alternative Site’s position and proposed use therefore continues to represent a natural and logical location for the settlement’s expansion in the context of adjoining established and proposed residential development.

As detailed above, the Candidate Site adjoins and in effect lies within the existing settlement and form of Burry Port. The existing built form and pattern of the settlement follows key access routes, such as the A484 Gwscwm Road and Lando Road, to the north and Ashburnham Road. The established town centre at Station Road extends off Ashburnham Road, with multiple cul-de-sac modern developments concentrated to the mid-hillslopes to the north of the A484 road, or south to the main railway line extending west to east from Burry Port to Kidwelly.

Burry Port is particularly popular to new homeowners due to its coastal position, and short drive to Llanelli, and in particular the A484 link to Carmarthen.

2.2.6 In terms of the Alternative Site is located within easy walking and driving distance of all community facilities and local services present and provided within the settlement of Burry Port. Access to further facilities in the towns of Llanelli and Carmarthen can then be gained by regular bus services, stops for which are located near the Dolau Fan junction with Colby Road.

The sustainable position of Burry Port should therefore be given full consideration when considering potential future growth options.

2.3 Settlement Facilities

2.3.1 The Site at Dolau Fan lies some 10 minutes' walk from the centre of the town at Station Road.

Public bus stops lie immediately near the Dolau Fan's junction with the Colby Road carriageway.

Main public bus services call at these bus stops, in particular:

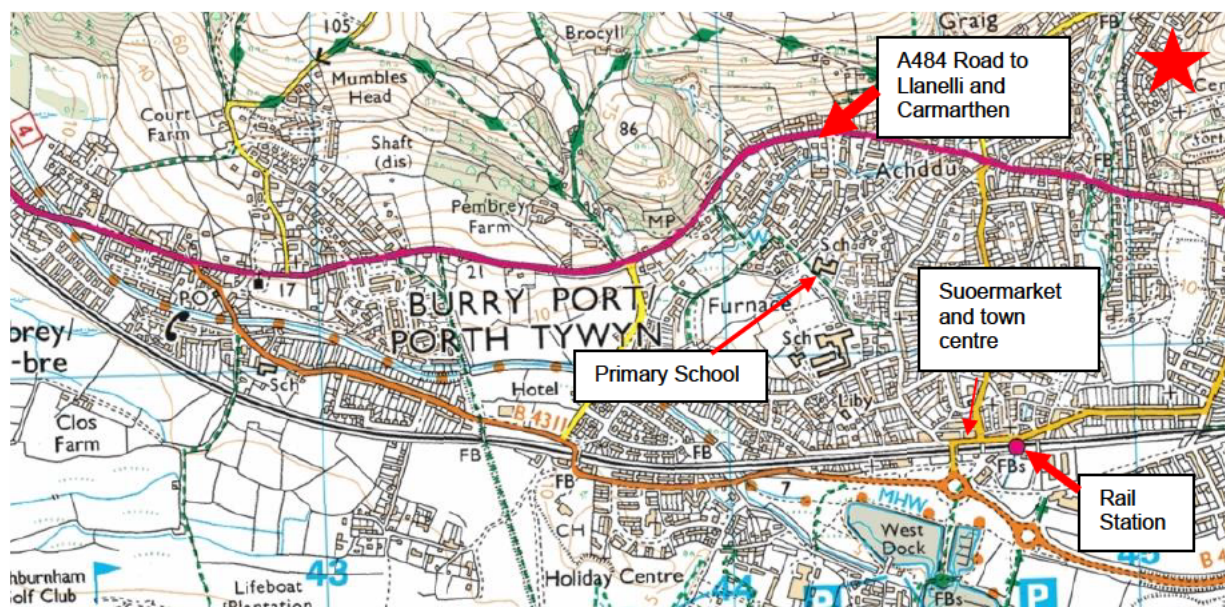
- Service 111 – Kidwelly to Swansea, calling at Pembrey, Burry Port, Llanelli, Trostre, Gorseinon, and Fforestfach
- Service X11 – Carmarthen to Swansea, calling at Ferryside, Burry Port, Llanelli, Trostre and Fforestfach retail parks

2.3.2 The site at Dolau Fan is within 10 minutes' walk, to the London Paddington to Fishguard / Pembroke Dock rail service at Burry Port station.

2.3.3 The Site lies within a 5-minute walking distance of Burry Port Primary school at Elkington Park. Ysgol Y Strade and Burry Port Secondary Schools are located at Llanelli and Burry Port respectively, with pupil bus transport available to Ysgol-y-Strade. The CCTA campuses at Llanelli and Carmarthen are also available via student bus services.

2.3.4 Burry Port town centre provides a range of small comparison shops, supermarket, petrol filling station, public houses / cafes, offices, rail station and industrial estates. Plan F below provides an indication of the proximity of the site to Burry Port town centre, with its rail station and strategic road network to Llanelli and Carmarthen.

The **red star** denotes the position of the Alternative Site.



Plan F – proximity of Alternative Site to Burry Port town centre

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 **26 bungalows** 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 replacement LDP for the purposes of a total of 26 residential units. As detailed above, the accompanying illustrative layout (reproduced below at Plan G) demonstrates that the site is capable of accommodating this number in a deliverable and sustainable manner.



Site layout plan - Plan G

- 3.1.2 As illustrated above, the site is capable of accommodating detached and semi-detached, single-storey bungalows to replicate and being reflective of the existing form and density of residential properties adjoining at Dolau Fan.
- 3.1.3 With regards to access, it is proposed that the Alternative Site would be served by an extension of the Dolau Fan estate road in to the western perimeter of the site. thus, improving the existing access arrangements. This stretch of Dolau Fan experiences very low vehicle speeds, considerably below the 20mph speed limit given the cul-de-sac nature of the estate. Forward visibility splays in excess of 43m can be achieved within this built-up locality. Within the site, a carriageway of 5.5 metres width with 1.8 metres wide footway can be created.
- 3.1.4 The Alternative Site proposals are able to fully retain all existing boundary treatments, being the established mature hedgerows across the western and eastern sides of the field, which would be retained and managed wherever possible.
- 3.1.5 Although due to the proximity of existing facilities in Burry Port, the proposal does not include any formal areas of play or open space. It is recognised and supported that an element of the proposed units could be Affordable in nature, or contributions made to support affordable housing elsewhere in the Llanelli locality, which under the provisions of the current LDP would be in the region of 20% of the total number of dwellinghouses.

3.2 INFRASTRUCTURE CONSIDERATIONS

- 3.2.1 Development of the Candidate Site for residential units would be served by mains water, gas, public sewer and electricity connections, which either lie within the respective stretch of Dolau Fan carriageway.
- 3.2.2 The estate road highway itself is equipped with roadside gullies and drainage which aid to discharge run-off from the carriageway. The proposed access to the site could connect to the existing highways drainage.
- 3.2.3 The Candidate Site comprises of semi-improved grassland. There are no areas of significant marshy grassland or water-logging evident, and therefore at first inspection, it appears that the site benefits from good ground percolation of rainwater.
- 3.2.4 Soakaways would be the most sustainable means of disposing of surface water from individual properties. If required, attenuation measures can be deployed on site to control surface water run-off during extreme storm events, which could also allow for additional capacity, making allowances for climate change. The field enclosures are served by a series of drainage ditches along the fields boundaries, which eventually combine and inter-connect discharging surface water which eventually discharge to the Estuary. It is considered that as a result of on-site features, there would be a number of options available to a future development of the site in terms of surface water disposal.

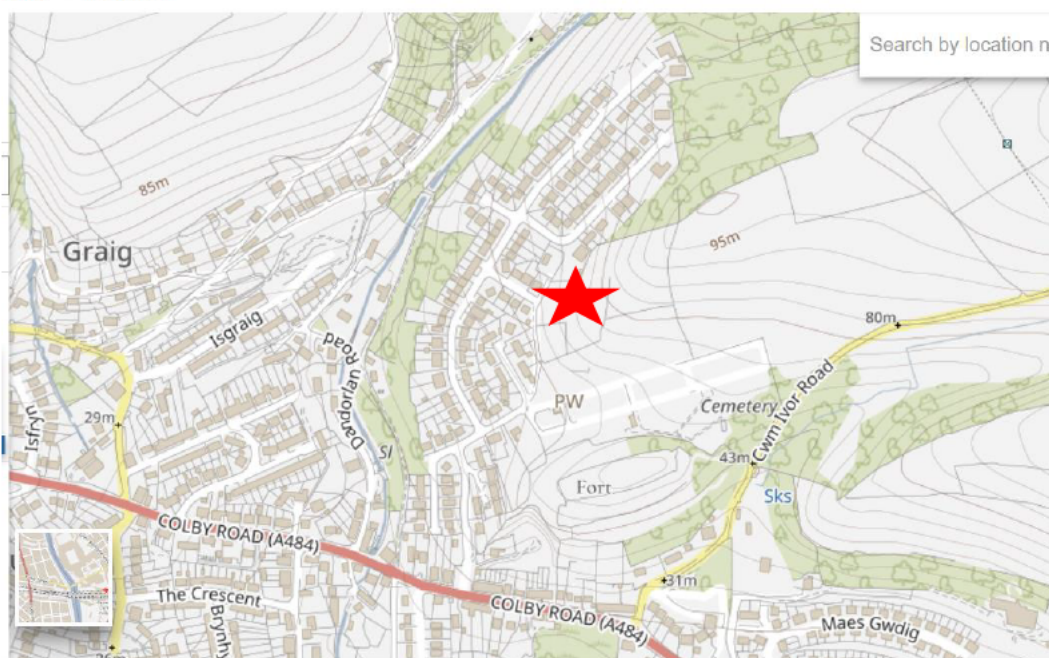
4.0 ENVIRONMENTAL CONSIDERATIONS

4.1 ECOLOGICAL ATTRIBUTES

- 4.1.1 The Site has been assessed against data held on the “*Data MAP Wales*” website, which details statutory and non-statutory National and Local sites of ecological importance. Plan H below provides an extract of those records as applied to the Burry Port locality. The **red star** denotes the position of the Alternative Site.
- 4.1.2 The records reveal that the Site does not include or adjoin any national or local nature conservation designation. The site is some 0.5 kilometres distant from the Special Area of Conservation at Carmarthen Bay.
- 4.1.3 Any biodiversity assets that may be present at or adjoining the Alternative Site have been given full consideration with regards to exploring its potential for residential development. This has included the proposed retention and management of existing boundary tree and hedgerow features. It is envisaged that the entirety of mature trees off the south-western and eastern boundaries could be retained and managed further for uninterrupted biodiversity gain.



[Home](#) > [New map](#)



Plan H – Extract from Data Map Wales detailing any known ecological interests

- 4.1.4 In the wider context, the site does not adjoin or form part of any local or national nature conservation designation. There are a number of areas of established woodland, which are clearly evident on the Google Earth image presented as Plan C above. These will

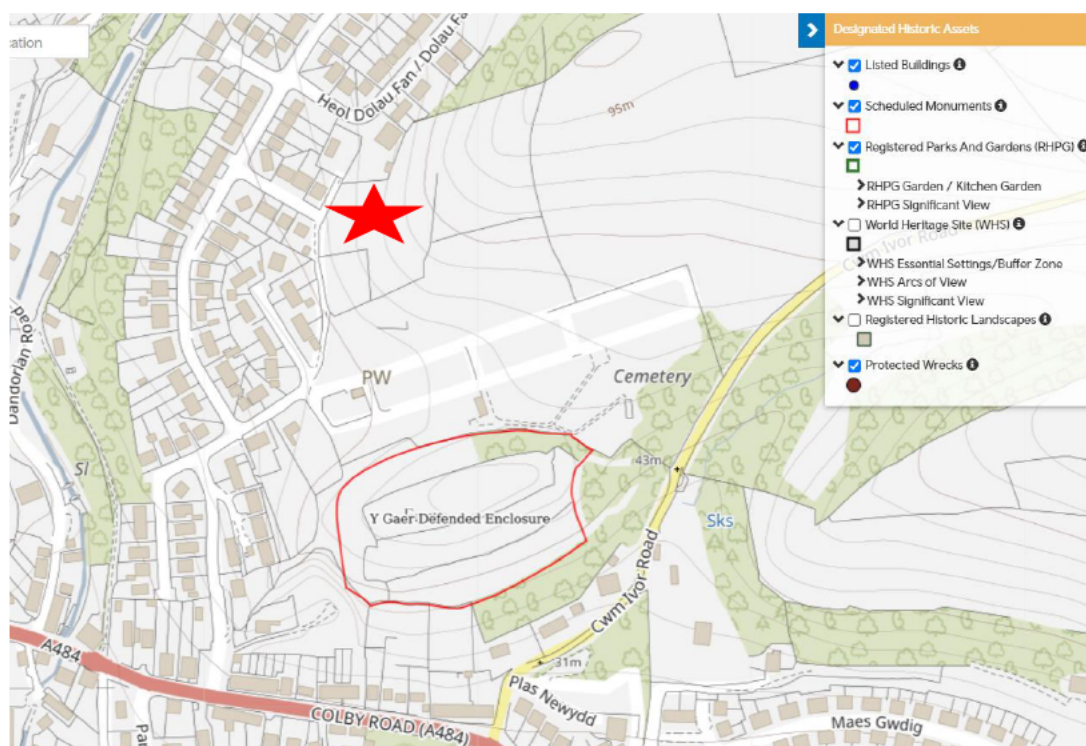
not be affected by development within the Alternative Site, as the indicative site layout provides for sufficient buffer space to those existing root systems and crown spreads, and can be fully retained in situ, providing continued ecological retention and connectivity.

- 4.1.5 It is considered that any statutory and non-statutory designations are significantly distant from the site, which will ensure that its development would have no detrimental impact on them.

4.2 HISTORICAL ASSETS

- 4.2.1 The Alternative Site has been assessed for any proximity to known and designated Historic Assets, using the “*Cof Cymru – National Historic Assets of Wales*” from CADW’s website. An extract from Cof Cymru Assets map for this part of Burry Port is reproduced below as Plan I The red star denotes the position of the Alternative Site.

- 4.2.2 The Alternative Site does not include or form part of any Listed Buildings or proximity to a Conservation Area. There are no Conservation Areas located near the Alternative Site. The proposed development of the Site would be located off the northern side of the Y Gaer Scheduled Monument, separated by the public cemetery. It is considered that being uphill of the historic monument would render any development unlikely to encounter historic remains / interests.

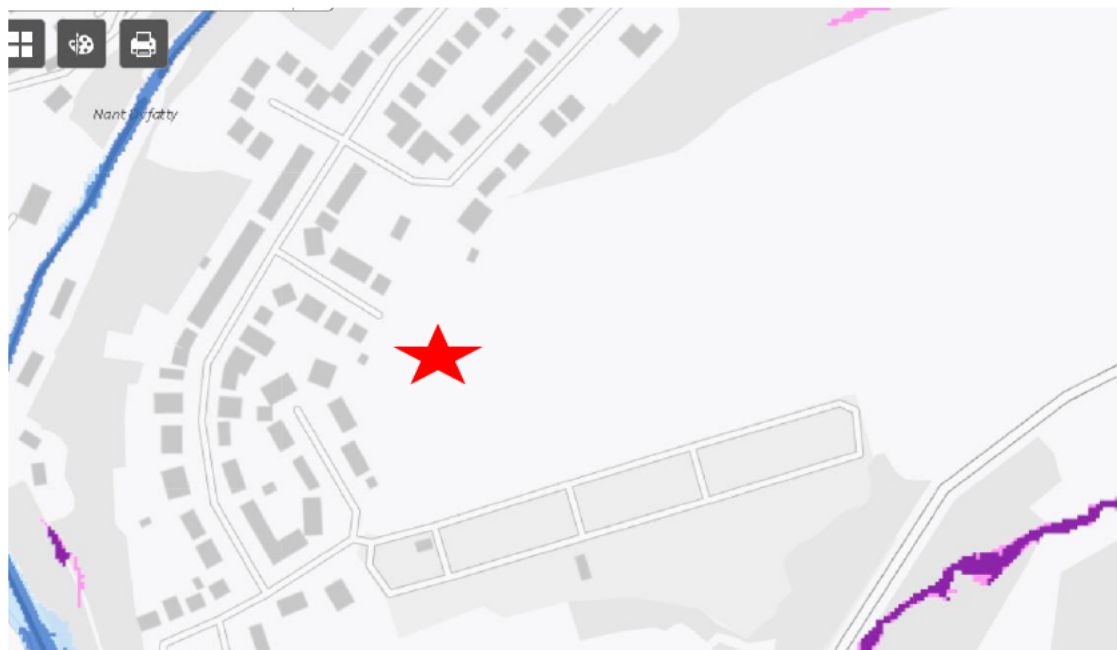


Plan I – Extract from Cof Cymru Historic Assets website

4.3 ENVIRONMENTAL CONSTRAINTS

4.3.1 Potential for Risk from Flooding

The Alternative Site has been assessed against the Development Advice Maps, prepared by Natural Resources Wales, and “Flood Map for Flooding.” An extract from the FPfP map is reproduced below as Plan J, with the site denoted by a **red star**.



Plan J – Extract from NRW’s Flood Map for Planning

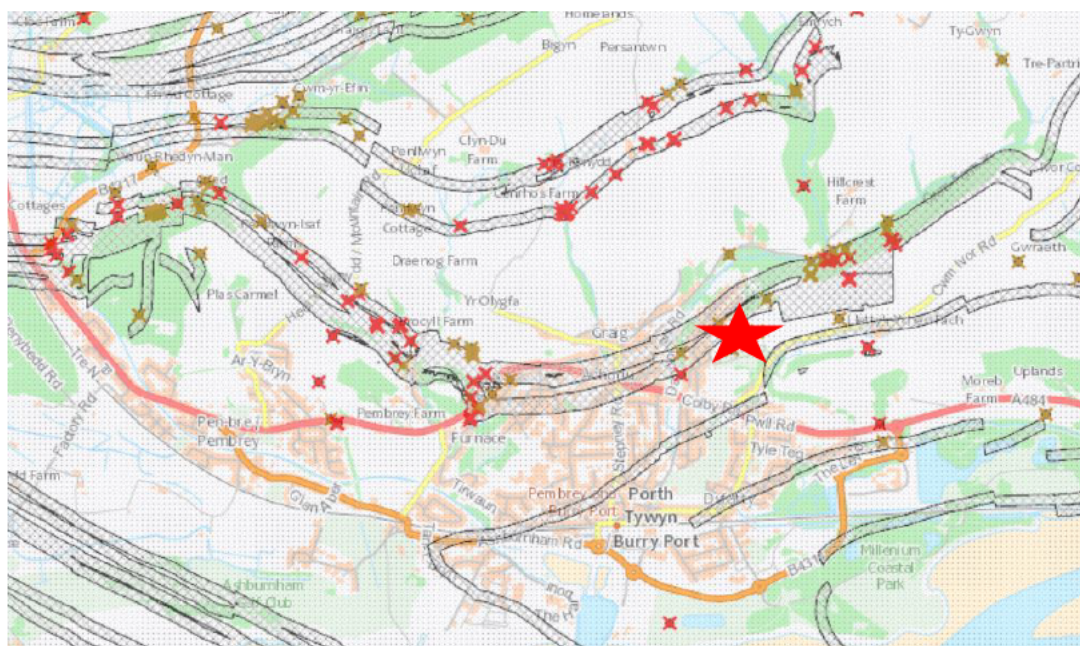
4.3.2 The above plan extract reveals that the field enclosure lies just outside any designated flood zone. An examination has also been made of the NRW records relating to potential surface water flooding. Plan J also indicates areas of land in the locality susceptible to such surface water flooding risk, which are denoted by purple tone.

4.3.3 Any development of the Candidate Site would involve engineering works to ensure that there sufficient on-site attenuation of surface water and that the existing boundary drainage ditches are improved and have sufficient capacity to receive surface water from existing and proposed developments.

4.3.4 Past & Present Potential for Ground Contamination and Coal Mining Activity

The Candidate Site comprises agricultural pasture. Due to its greenfield nature and domestic use, the rear field of the Alternative Site has no history of known past ground contamination related constraints. Whilst the locality has historically been the subject of coal mining, the records of The Coal Authority have been examined to ascertain any precise mine entries, addits or seams of shallow coal and mine workings. An extract

from The Coal Authority interactive mapping base is reproduced as Plan K, with the site identified by a red star.



Plan K – Extract from Coal Authority’s records map for locality

4.3.5 The Coal Authority records reveal that coal seams underlay Dolau Fan, with historic mine shafts dotted about this hillslope. The presence of coal seams did not deter the construction of several hundred houses at Dolau Fan some fifty years ago and is unlikely through modern building techniques to deter or prohibit construction upon the Alternative Site.

5.0 VIABILITY

- 5.0.1 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 inherently poses risks that the Plan may be unsound and so in turn fails to meet its own targets or objectives.
- 5.0.2 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. The following therefore represents such a process and is fit-for-purpose in providing confidence with regards to both the viability and deliverability of the Candidate Site at this stage. **It should be noted that more detailed analysis at a planning application stage may result in some potential variance.**

5.1 VIABILITY APPRAISAL

- 5.1.1 The following provides an indication of the viability of delivering the proposed 26 units on the Alternative Site in question. It is based very much on its greenfield status and uses values and costings previously accepted by the Local Authority through its determination of planning applications and other works. The following appraisal is therefore based on the assumptions set out below in order to provide a residual land value for the scheme.

Costs

- Dwelling construction costs are based on an absolute minimum of £1300 per metre given that bespoke 3/4 bed detached bungalows (130 sq.m.), with a medium grade of internal finishing, and formation of accesses to the highway are likely to be the preferred house type. Two bedroomed semi-detached bungalows of 80 sq.m. are also proposed
- Estate road carriageway costs of £1200 per linear metre
- Connections for all utilities include water, foul water and electric.
- Developer's Profit based on minimum RICS guidelines (18%)
- Professional Fees include planning application fee, associated professional fees, estate agency fees (1%) and LABC Warranty fee.

Sales Values

- Sale Prices based on LPAs “Affordable Housing” Supplementary Planning Guidance, market research and Welsh Government “Acceptable Cost Guidance” figures where relevant.

5.1.2 Using the above, the following represents a strategic viability appraisal for the proposed 26 units, based on an affordable housing level of 20% which provides for 3 x three-bed dwellinghouses.

| Costs | Cost Per Unit/Metre | No. Units/Metres | Total |
|----------------------------|----------------------------|-------------------------|------------------|
| Four Bed Bungalows | 169,000 | 14 | 2,366,000 |
| Two Bed Bungalows | 104,000 | 12 | 1,248,000 |
| Estate Road | 1200 | 200 | 240,000 |
| Utility Connections | 5000 | 26 | 130,000 |
| Professional Fees | - | - | 120,000 |
| Sprinklers | 3500 | 26 | 91,000 |
| Parks Contribution | 2464 | 26 | 64,000 |
| Education Contribution | 1000 | 17 children | 17,000 |
| | | | |
| Total | | | 4,276,000 |
| Sales | | | |
| 3/4 Bed (Open M'kt) | 295,000 | 14 | 4,130,000 |
| Two Bed (Open M'kt) | 185,000 | 7 | 1,295,000 |
| Three Bed Affordable | 78,000 | 5 | 390,000 |
| Total | | | 5,815,000 |
| Developers Profit | | | 1,047,000 |
| Residual Land Value | | | 492,000 |

Table 2

5.1.3 Based on the above figures, it is considered that in-principle, the development of the site would be financially viable. The residual land value of £492,000 with a net area of 2.2 acres is consistent with evidence gathered over recent years by the District Valuer in examining residential site transactions within Carmarthenshire. The DV discovered land values on completed and on-going sites to be averaging £245,000 per net residential acre of land, based on 2019 values.

5.2 DELIVERABILITY

5.2.1 In terms of deliverability, it should be firstly noted, as illustrated above, that 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.

- 5.2.2 In terms of a delivery timescale, with a developer secured, it is envisaged that the site could be capable of being completed within 3 years from the adoption of the replacement Local Development Plan. Burry Port remains an attractive part of the Carmarthen Bay coastline, benefitting from its semi-rural location, but easy access to Carmarthen and Llanelli by road and rail and the nearby schools, shops, services and community facilities.
- 5.2.3 The presence of modern houses at Goodig and Glanmor Terrace is testament to this market need and the desire for home buyers to seek out such forms of modest residential development.

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 11)* 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, 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 formal 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’s 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 PPW 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 PPW 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 ground instability, ecological interest, flood risk, 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, and its form contained by firm, defensible perimeters.

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

7.0 CONCLUSION

- 7.1.1 The Alternative Site consists of the lowest section of a semi-improved grazing field, which falls against the rear of the public cemetery, and off the eastern side of residential properties at Dolau Fan. The development of the site would form a parallel development with Dolau Fan as that modern cul-de-sac ascends ground levels north of the town and A484 main arterial road.
- 7.1.2 The Alternative Site forms a logical extension to the existing settlement, being well related to established residential development off its southern perimeter, and further development to the east upon The Graig. The Site can be found to be capable of being accessed off the existing public road carriageway, with extension of the cul-de-sac arrangement into the Alternative Site.
- 7.1.3 The precise location is such that the strong defensible boundaries of boundary hedgerows and trees off the south-eastern and eastern perimeters provide a natural and part physical screen from views within the wider landscape. The development of the site would take place against the backdrop of higher ground to the north and residential properties to the immediate foreground. Accordingly, the development of the site would remain more akin in character to the built-up form of Burry Port, than open gorse and shrub to the north and north-east.
- 7.1.4 In addition to the above, the site lies within close proximity and walking distance of the existing community services and local facilities of Burry Port, particularly convenience shops, supermarket, convenience shops, public houses, rail station and Primary and Secondary Schools, which will ensure it makes a positive contribution to both national and local sustainable development objectives.
- 7.1.5 With the Alternative 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.
- 7.1.6 In view of the above and information provided in this Statement, it is respectfully requested that the Alternative Site in question be allocated for a modest residential development.