



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

LAND PART OF WERN FRAITH FARM, PORTHYRHYD

On behalf of
Jones Brothers (Henllan) Limited

Our Ref: 1023c
Date: March 2023
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INTRODUCTION

1.1 Evans Banks Planning has been instructed by Jones Brothers (Henllan) Limited to prepare and submit an Alternative Site Supporting Statement for the allocation of land part of Wern Fraith Farm, Porthyrhyd 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 site layout plan.

1.4 RECENT BACKGROUND TO ALTERNATIVE SITE SUBMISSION

Our clients are in the advanced stage of purchasing the freehold of the site, which is allocated for Residential Development (as Site Sc33/h3) in the current adopted Carmarthenshire Local Development Plan (2008-21). Jones Bros (Henllan) Limited have also advanced matters to preparing an application for full planning permission, which has underwent a formal Pre-Application Enquiry before the Local Planning Authority in 2021 (referenced PRE/00495). The application proposals have also proceeded through a formal and statutory period of Pre-Application Consultation for the construction of 42 dwellinghouses in November – December 2022.

1.5 The draft planning application proposals have recently undergone extensive and formal discussions and meetings with Officers of the Council's SAB Drainage Section, in order to establish their preferred methods and means of disposing of surface water from the site. This has necessitated further, but relatively minor, changes to the application proposals. This has generated the need for a second Pre-Application Consultation exercise, which took place over February and March 2023.

1.6 That very recent consultation exercise **did not generate any formal objections** from statutory consultees, such as the Council's Highways Division, Natural Resources Wales, Welsh Water, CADW, Coal Authority and Welsh Government Trunk Roads

Agency. The planning application is subsequently pending formal validation with the Local Planning Authority.

- 1.7 The site was not subject to a formal Candidate Site submission in August 2018 on account of already allocated status in the adopted LDP (2008-21). We have noted that the Council in preparation of the Second Deposit Draft of the LDP prepared a “*Site Assessment Table*” (January 2023). It provides details of the Council’s analysis of each received Candidate Site submission and also residential and employment allocations from the adopted 2014 LDP. We note that in the case of Residential Allocation SC33/h3 at Wern Fraith it successfully passed through Stage 1 (site compatible against the location of future growth presented in the Preferred Strategy) and Stage 2A (Initial Detailed Site Assessment) of the Council’s site assessment. However, it was rejected at Stage 2B (further detailed site assessment), with reasons for non-inclusion reported as follows:
“Allocation to be removed. There are concerns regarding the deliverability of the site.”
- 1.8 This Report seeks to address the issues raised and provide justification and solutions to illustrate to the Council that its misgivings over deliverability are premature, and that it is our clients’ firm intent to obtain planning permission as expeditiously as possible, and to implement and construct the site in the very early stages of the Replacement LDP Plan Period.

2.0 SITE CONTEXT

- 2.1 The Alternative Site comprises the significant part of a large undulating to gently sloping grazing field enclosure, which is some 1.62 hectares (4 acres) in size. The entire field lies immediately off the northern flank of a minor road classified as the C2068, which junctions off the B4310 near the centre of the village of Porthyrhyd. The enclosure is actively farmed, cultivated with a silage crop, and is well maintained. The Wern Fraith farmhouse and associated outbuildings are set off the western perimeter of the field enclosure, with mix of boundary mature trees and established hedgerow.
- 2.2 The carriageway of C2068 Road has a relatively straight alignment from its wide junction off the B4310 main road. A detached dwelling known as “Rhydyfro” separates the south-eastern corner of the application site from the main road junction, with the road frontage of the actual subject field extending westwards for a length of some 90 metres. The roadside frontage is marked by a post and wire fence, which has become overgrown with unmaintained hedgerow and scrub vegetation. A drainage ditch separates the fence line from a wide grassed highway verge, and the tarmac public carriageway.
- 2.3 Two detached dwellings are to be found off the northern flank of the road at this point, clustered near the farmyard. “Bwthyn-y-Dryw” is a bungalow, with detached garage to its side curtilage, and Wern Fraith Lodge is an established two-storey dwelling adjacent to the farm entrance. Both properties have rear garden perimeters shared with the subject site. Modern detached bungalows and dormer bungalows are to be found directly opposite the site frontage, set back in generous curtilages, with detached garaging.
- The eastern perimeter of the site is formed by a linear stone wall, rising to some 1.8 metres in height and forming the boundary of a Chapel with compacted graveyard. That chapel and graveyard front on to the B4310, with further semi-detached, two-storey properties extending north along that main road frontage.
- 2.4 The agricultural field extends further north running parallel with the rear garden boundaries of frontage properties on the B road, to a northern-most field hedgerow. Further agricultural fields are to be found adjoining to the north-west and west of the northern part of the site.
- 2.5 Figure 1 illustrates a wider OS Map of the village to highlight the position of Wern Fraith in relation to the village centre, whilst Figure 2 provides a “Google Earth” image of the site, with the above features identified. Figure 3 below depicts an Ordnance Survey map extract with the potential application site edged in red.

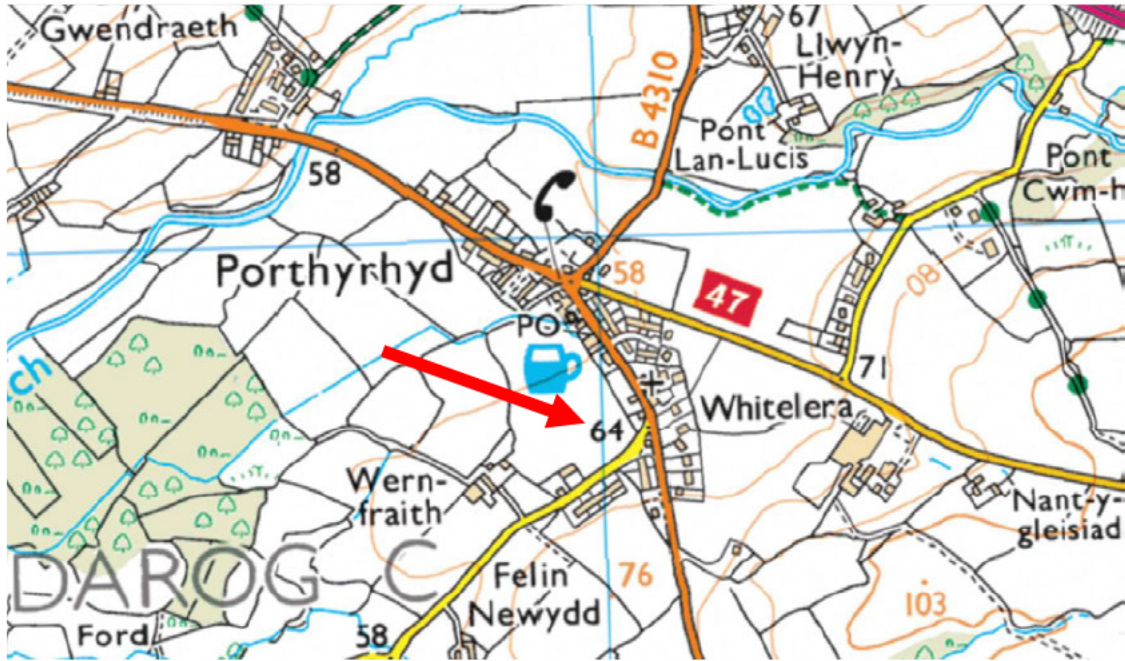


Figure 1 – OS Explorer Map with Application Site identified



Figure 2 – Google Earth image – April 2021

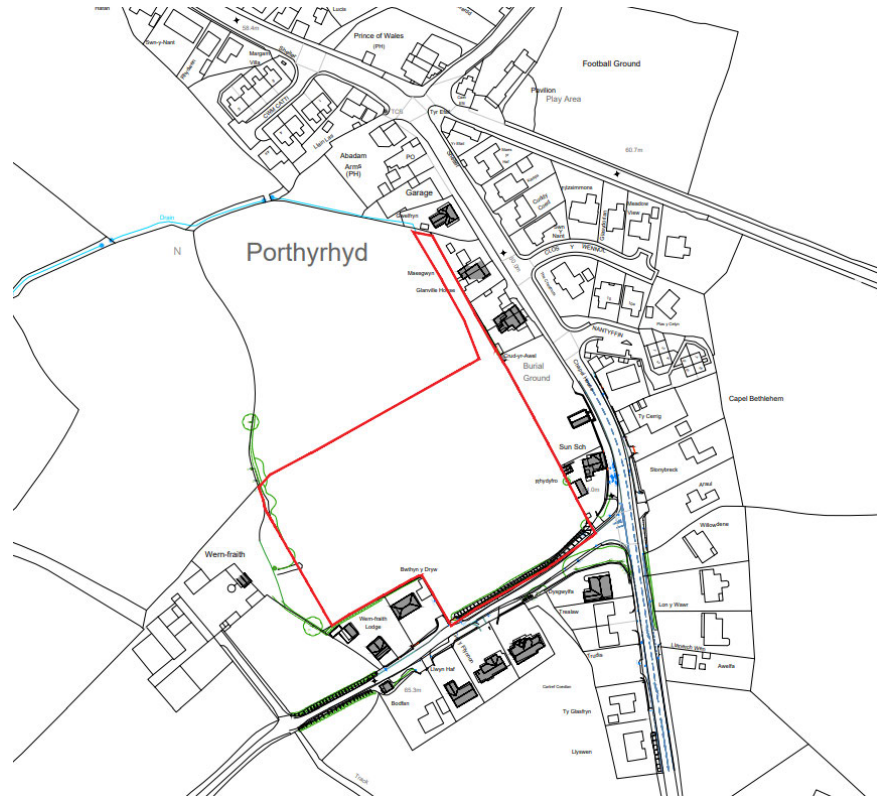


Figure 3 – Ordnance Survey Map Extract with site edged in red

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 part of Wern Fraith is known as “*R/O Ysgoldy, Bethlehem*” falls within the defined Settlement Limits of Porthyrhyd and allocated as **Site SC33/h3**. Figure 4 below provides an extract of the Proposals Map of Porthyrhyd. Policy H1 of the adopted Plan suggests that an indicative capacity for the Wern Fraith site could be around 27 units.

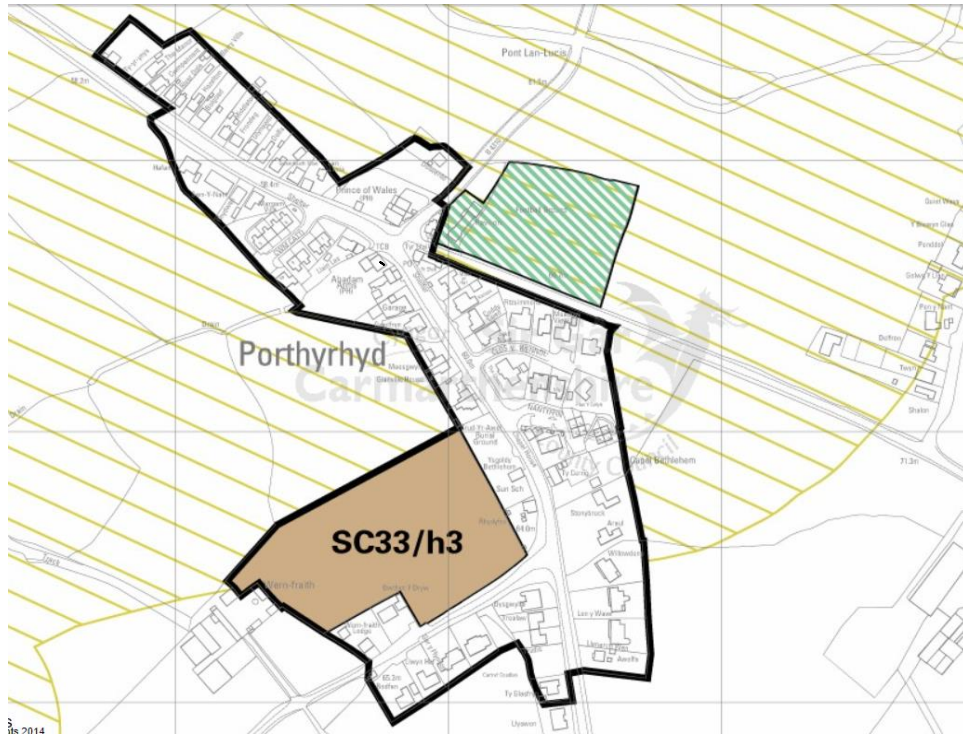


Figure 4 – Extract from Adopted LDP Proposals Map of Porthyrhyd (2014)

2.2.2 Within the Second Draft of the Deposit LDP for the Plan Period 2018-2033, the settlement limits of this part of Porthyrhyd have changed to exclude the site, as shown in Figure 5 below.



Figure 5 – Second Draft of Proposals Map (2023) at Porthyrhyd

2.2.3 A notable change between the adopted and emerging LDP Plans is that Sustainable Community 33, which did combine Porthyrhyd with Llanddarog has now been segregated in the new Second Deposit Draft, so far Porthyrhyd is now set alone as SuV20 and Llanddarog as SuV19. When combined in the adopted-2014 LDP the Council allocated the following sites:

Llanddarog	SC33/h1	Land opp. Village Hall	0	16	0	16
	SC33/h2	Is Y Llan	0	6	0	6
Porthyrhyd	SC33/h3	R/O Ysgoldy Bethlehem	0	27	0	27
	SC33/h4	Adj. Derwen Deg	8	1	8	9
Total			3	50	8	58

Figure 6 – Allocated Residential Sites in SC33

2.2.4 Housing Land Availability in Porthyrhyd and Llanddarog

It is clear that proposed residential land opportunities in Porthyrhyd and Llanddarog 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 in the two settlements. Figure 7 below itemises the three new allocations. The former allocated site at **Derwen Deg has been completed**, and the former proposed site at Is-y-Llan has been omitted.

Llanddarog				
SuV19/h1	Land Opp. Village Hall	16	3.2	Year 6 - 10
SuV19/h2	Land adj. and the r/o Haulfan	10	1	Year 6 - 10 Year 11 - 15
Porthyrhyd				
SuV20/h1	Land adjacent to Llwynhenry Farm	6	Commuted Sum Contribution	Year 6 - 10 Year 11 - 15

Figure 7 – HOM1 Draft Residential Allocations in Porthyrhyd & Llanddarog

2.2.5 At Porthyrhyd, only one small residential allocation is proposed, that being SuV20/h1 at Llwynhenry Farm, and capable of only providing 6 dwellinghouses. At nearby Llanddarog, two sites are proposed for allocation, with the one at “*Land opposite Village Hall*” (SuV19/h1) being carried over from the adopted LDP. It benefits from Approval of Reserved Matters for a mix of three and four bed two-storey houses about a cul-de-sac layout. We note the Applicant is currently seeking relaxation to the extant Section 106 Agreement imposed upon the permission of 16 houses, to reduce the number of Affordable Houses on the site from 3 to 2 in number.

- 2.2.6 The allocation at “*Land adjacent and rear of Haulfryn*” (SuV19/h2) is a **new allocation** in the Second Deposit Draft for only 10 units and appears to have replaced the “*Is-y-Llan*” allocation from the 2014 adopted Plan.

2.3 Settlement Facilities

- 2.3.1 The adopted 2014 LDP and Second Deposit Draft Plans **both recognise the sustainable nature of Porthyrhyd**, and in particular that the site at Wern Fraith continues to be accessible on foot and cycle to the locality’s community and public transport facilities.
- 2.3.2 The site at Wern Fraith lies within a 5-minute walking distance of Porthyrhyd’s two public houses, “The Abadam Arms” and “Prince of Wales”, together with the Spar convenience store, post office and “Y Neuadd Fach” community hall, equipped with children’s playground and sports field. All lie within the village centre at the junction with the Porthyrhyd to Nantgaredig Road. That road continues north to underpass the A48 trunk road en-route to the National Botanic Garden for Wales at Middleton Hall.
- 2.3.3 This section of B4310 Road lies upon a primary public bus route, with Services 129 and 166 running to Drefach, Tumble and Llanelli. Foelgastell, Cefneithin & Cross Hands to the east, and Llanddarog and Carmarthen to the north-west.
- 2.3.4 Ysgol Gyfen Maes-y-Gwendraeth is located a short road distance from Porthyrhyd via public and school transport.
- 2.3.5 National Cycle Route 47 – Llanelli to National Botanic Gardens – includes the section of the B road which passes the C road junction in Porthyrhyd.
- 2.3.6 Nearby Cross Hands provides a whole range of large food supermarkets, comparison shops and industrial estates, whilst Carmarthen town centre some 8 miles to the west provides a greater range of retail, employment and administrative facilities.

3.0 THE PROPOSAL

3.1 As part of the requirements for the promotion of sites for residential development, this Statement is accompanied by a fully engineered site layout for a potential residential scheme totalling 42 dwellinghouses and residential apartments that can be developed on the site. It demonstrates that the site is capable of accommodating this number in a deliverable and sustainable manner with single access point off the C class road, being only 90 metres west of its junction with the B4310 Drefach to Llanddarog Road. Figure 8 below sets out the proposed site arrangement, which is subject to an application for full planning permission in 2023.



Figure 8 – Proposed Site layout plan

3.2 The new junction will be designed with 6.0 metres wide radii set back off a widened C2068 road carriageway, which will also be proposed to be provided with a new 2.0

metres wide footway across the entire northern flank of the minor road, linking to the existing pavement about the B road junction. The C Road will be widened to 5.5 metres, with the new site junction equipped with visibility splays in excess of National Standards, enabling motorists to have full sight of vehicles over 100 metres distance away at the road junction, and looking west past the Wern Fraith farmyard.

- 3.3 The lower part of the field, parallel with the roadside fence and hedge line is shown with the Natural Resources Wales' Development Advice Map as susceptible to surface water flooding. Figure 9 below provides an extract from the DAM map and the area of water pooling is shown. Investigations at the site have revealed that excess water from the roadside drainage ditch is overbanking during inclement weather causing it to flow onto the agricultural field. When groundwaters recede the excess surface water returns to the ditch and flows away. The ditch is also connected to the road drainage system off the B410 road junction, which culverts into the ditch close to the adjoining property at Rhydyfro. The culvert has not been subject to regular maintenance, and thus causes the overtopping of the drainage ditch into the adjoining field. The proposed scheme seeks to relieve such matters with a SAB-adoptable scheme to provide efficient attenuation measures, as shown in the engineering layout at Figure 10 overleaf. Attenuation basins will be formed to the foreground and part rear of the site, with new underground apparatus channelling surface water away to the north.

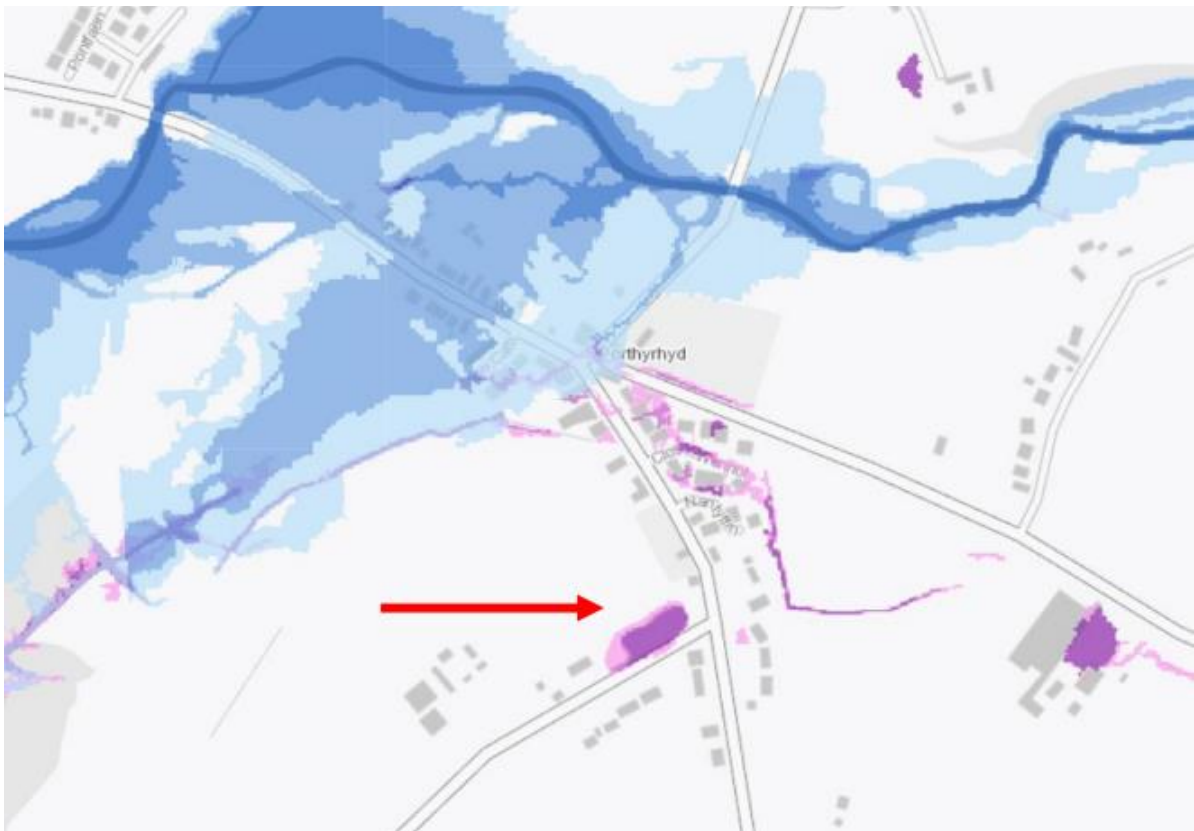


Figure 9 – NRW DAM Map for Porthyrhyd, illustrating extent of surface water ingress onto the site frontage



Figure 10 – Engineering proposals for site of 42 Residential Units

3.4 Infrastructure Considerations

Development of the Alternative Site for 42 residential units would be served by mains water, gas, public sewer and electricity connections, which lie within the respective stretch of public carriageway. Extensive pre-application consultation has taken place with Welsh Water, Wales & West Utilities and Western Power Distribution to confirm sufficient supply, and there are no local capacity difficulties reported in catering for the number of new units proposed at the site.

3.5 Ecological Considerations

The site has undergone through a Preliminary Ecological Appraisal, undertaken by Licenced Ecologists. No flora or fauna of national or regional important was discovered. The site has been investigated for evidence of any on-site or nearby habitats for protected species, and none have been discovered. The site is a well-managed parcel of semi-improved grassland from which the landowner has taken a silage cut every season. All perimeter trees can be retained and allowed to flourish.

4.0 DELIVERABILITY

- 4.1 In terms of deliverability, it should be firstly noted that the development of the site is financially viable. The site is subject to final completion by our clients from the presiding farm ownership. Jones Brothers (Henllan) Limited possess the financial capital to purchase the site, absorb the costs of securing full planning permission, and to construct and complete the entire development of 42 dwellinghouses and residential apartments. The scheme as presented will provide for 69% Affordable Housing, being over twice as required affordable provision. The scheme is being delivered in association with Pobl Group, with a total of 19 social rented and 10 low-cost home ownership dwellings and apartments will be provided across the site. The remaining 13 dwellinghouses will be privately sold. A financial contribution will also be made to Education Improvements in the locality of the site in accord with current adopted Supplementary Planning Guidance.
- 4.2 In terms of a delivery timescale, with Jones Bros. (Henllan) Limited's ownership secured, it is envisaged that the site could be capable of being completed within two years from the award of full planning permission, which in accord with the Replacement Local Development Plan would be within years 6 and 7 (2024-25) of the Plan Period.
- 4.3 Porthyrhyd remains an attractive part of the semi-rural landscape set alongside the A48 trunk road corridor between Carmarthen and Cross Hands. It benefits from strong marketability as a result of that semi-rural location, and undoubted easy access to Carmarthen and Cross Hands by road, with nearby schools, shops, services and community facilities.
- 4.4 The presence of modern, detached houses located near the site is testament to this market need and the desire for home buyers to seek out such forms of high-quality residential development.
- 4.5 The deliverability of the site has been partly hampered through no fault of the landowners, nor prospective purchasers. A technical solution has had to be found to resolving the third-party blockage of the existing culvert under the B4310 highway, which has caused partial surface water flooding across a small section of the site's roadside frontage. Extensive discussions with the Council's Engineers, both within Highways and SAB Divisions, has resulted in a mutually acceptable solution being arrived at and presented for formal approval in newly prepared applications for planning permission and SAB Consent. Such successful conclusions have "unlocked" the immediate delivery of the site, and it can now be implemented subject to approval of those applications.

5.0 CONCLUSION

- 5.1 The Alternative Site consists of part of a grazing field set within a long frontage off a minor road, close to an established junction with the B4310 road at Porthyrhyd. Its formal allocation for residential development within the Carmarthenshire Local Development Plan (2008-21) is undisputed, and yet the site has not come forward until now with firm and comprehensive application proposals.
- 5.2 The Alternative Site forms a logical extension to the existing settlement, being well related to established residential development off its whole eastern and western perimeters, and further housing development to the opposite, southern flank of the minor road. The Site is capable of being accessed off the existing public road carriageway, which will be extensively widened and provided with a new footway where one is currently absent. The Alternative Site's delivery will accordingly benefit all road users along this stretch of public highway, improving road safety.
- 5.3 The precise location is such that the strong defensible boundaries of boundary hedgerows and trees off the western 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 residential properties to the immediate foreground. Accordingly, the development of the site would remain more akin in character to the built-up form of Porthyrhyd, than open pasture to the north and far west beyond the Wern Fraith farmyard.
- 5.4 In addition to the above, the site lies within close proximity and walking distance of the existing community services and local facilities of Porthyrhyd, particularly the post office and convenience shop, public houses and village hall and children's playground. It is accessible by road in less than 10 minutes to the locality's Primary and Secondary Schools. Therefore, in accord with National Planning Policy, the delivery of the Alternative Site will ensure it makes a positive contribution to both national and local sustainable development objectives.
- 5.5 With the Alternative Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if further allocated is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable candidate for future housing development.
- 5.6 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.