



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

LAND AT BRONWYDD ARMS, CARMARTHEN

on behalf of
Gwili Developments Ltd

Our Ref: 1184.a
Date: April 2022
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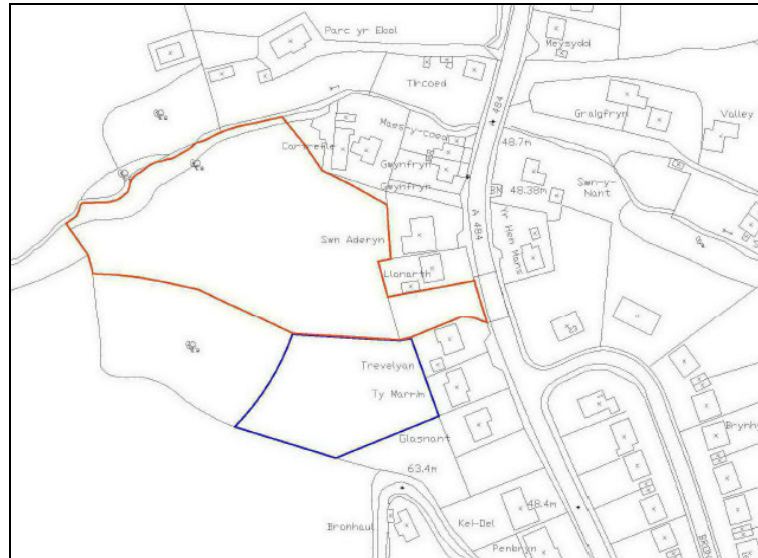
1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. has been instructed by Gwili Developments Ltd to prepare and submit an Alternative Site Report for the allocation of land at Bronwydd Arms, Carmarthen for the purposes of residential 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 approved drawing package, as well as an integrated sustainability assessment undertaken in-line with the Authority's requirements.

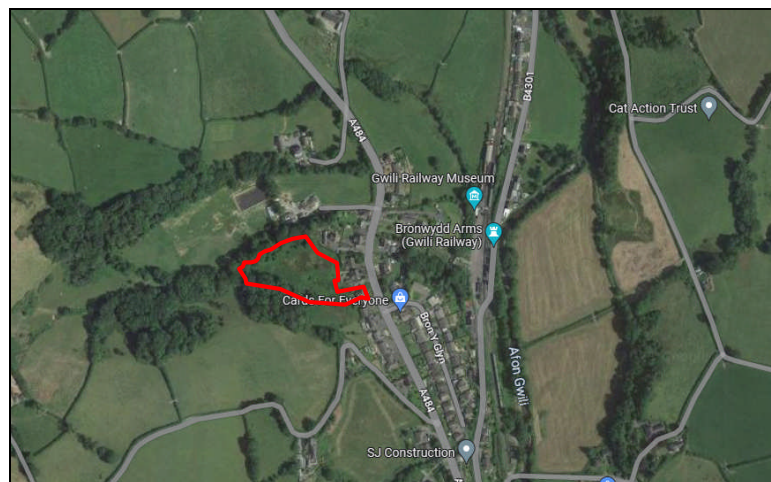
2.0 SITE CONTEXT

2.1 THE SITE AND CURRENT CONTEXT

2.1.1 The Candidate Site relates to a parcel of land measuring approximately 2.2 acres in area, edged red on the plan and image below.



Plan A



Photograph 1

2.1.2 The site currently consists of a single enclosure of semi improved grassland with a mixed topography. All its boundaries are currently well established, being defined by a mix of mature hedgerows and treelines, agricultural and domestic fencing, with the latter leading on to existing residential development on its eastern, southern and northern edges.

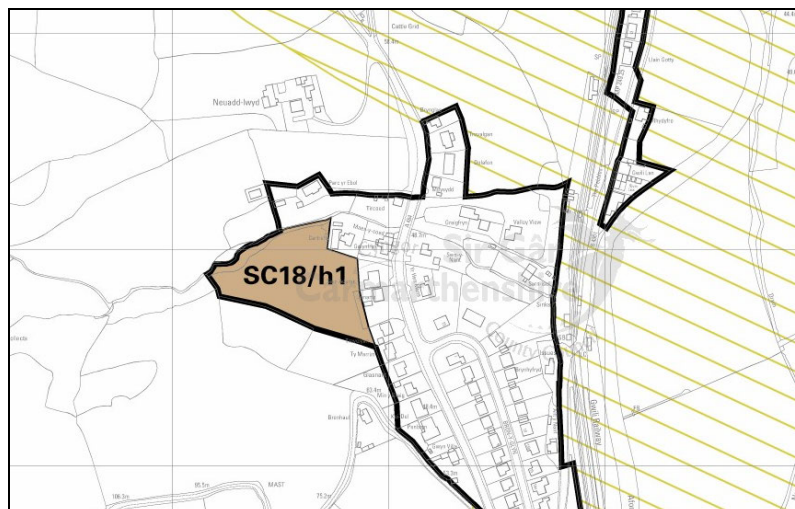
2.1.3 Access (red arrow in Photograph 2) to the Site is currently gained directly off the A484 at a point with excellent visibility, as illustrated below.



Photograph 2

2.1.4 It should be noted that the Alternative Site currently benefits from outline planning permission for 15 houses (LPA ref. No. W/20622) and our Client and their Design Team are currently working up a scheme for the submission of a reserved matters application.

2.1.5 Under the provisions of the current Carmarthenshire LDP, the Site is allocated for the purposes of residential development, as illustrated in the plan below.



Plan B

2.1.6 It is recognised that the allocation has yet to be developed, but this is due to the fact that although the aforementioned application was submitted in 2009 and was conditionally approved in 2013 by the Council’s Planning Committee, the local planning authority took a further 9 years to issue the outline planning permission in 2022, through no fault of the Applicant our Client.

2.1.7 The Alternative Site is therefore well related to the existing built form of the settlement of Bronwydd as a whole when existing residential development directly to its south, east and north is taken into consideration. Its position and proposed use 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 Site adjoins the existing built form of the settlement of Bronwydd. The existing built form and pattern of the settlement is elongated in nature, principally following and spurring off the A484 and B4301 that runs through it. However, the settlement does include some ‘in-depth’ examples of residential schemes, such as Bron y Glyn opposite the Alternative Site, Maes y Dderwen, Gelli Aur, Bro Celynin and Troed yr Ynys.

- 2.2.2 In terms of community facilities and local services, the settlement includes a village hall, cricket club and pitch, public house and chapel. It also has a number of very well served bus stops regularly visited by the 460 and 215 services.
- 2.2.3 As a result of the above, the Alternative Site is also within a short distance and bus journey from the nearby larger settlement and centre of Carmarthen, which includes a wider range of community facilities and local services. The strong sustainable position of the Alternative Site should therefore be given full consideration when considering potential future growth options.
- 2.2.4 In terms of planned growth, the settlement of Bronwydd forms part of Cluster 1 as defined by Policy SP3, being designated as a *Tier 3 – Sustainable Village*. However, despite this status, the settlement contains only 1 housing allocation, designated for the delivery of only 6 units. This in itself is surprising and concerning in view of the sustainable attributes and position of the settlement of Bronwydd in the County's settlement network.
- 2.2.5 In addition to the above, we have undertaken a comprehensive review of the proposed allocations put forward by the 2nd Deposit LDP for Cluster 1 and it has been identified that a number have significant questions over their ability to be delivered within the Plan period, including the following:

Ref. No.	Site Name	Units
PrC1/h4	Land of Parc y Delyn	17
PrC1/MU1	West Carmarthen	700
PrC1/MU2	Pibwrlwyd	247
SeC1/h4	Cae Canfas, Heol Llanelli, Pontyates	8
SuV4/h1	Adjacent Fron Heulog, Cynwyl Elfed	6
SuV12/h1	Adj. Gwyn Villa, Llanpumpsaint	20

Table 1

2.2.6 As a result of the above, separate objections have been made in relation to the above allocations and it is therefore important that alternative more deliverable sites should be identified, 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 residential development, this Statement is accompanied by a copy of the approved site layout for the proposed residential scheme for the Alternative Site. With the approval of the Council, this layout therefore demonstrates that the Site is capable of providing 15 units in a deliverable and sustainable manner. The following information therefore expands on this approved scheme.

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 15 residential units, in line with the current planning consent. As detailed above, the accompanying layout (reproduced below) demonstrates that the site is capable of accommodating this number in a deliverable and sustainable manner.



Plan C

3.1.2 As illustrated above, the site is capable of accommodating a mix of unit sizes and types, with the associated density – 15 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. The

positioning of the proposed units has also taken into account the topography of the site.

- 3.1.3 With regards then to access, as detailed previously, the Alternative Site has an existing point of vehicular access directly off the A484, which in turns represents the currently approved point of access. The Alternative Site would therefore be served by an adoptable highway off this point, with footway connections to the site also created.

3.2 INFRASTRUCTURE CONSIDERATIONS

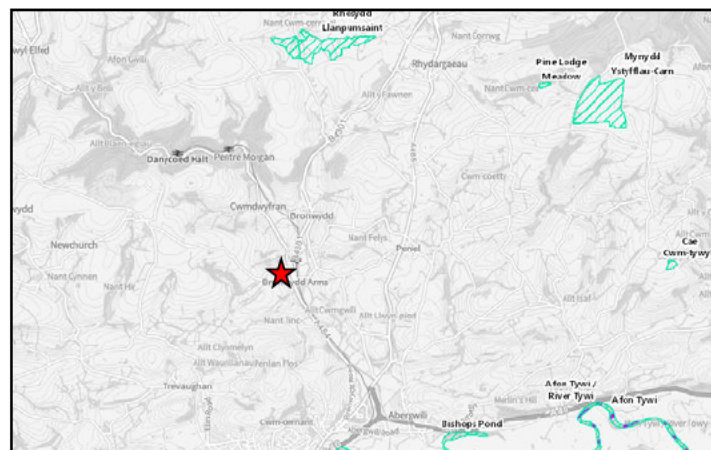
- 3.2.1 Any development of the Candidate Site for residential units would be served by mains water, public sewer and electricity, connections to which lie within or in close proximity to the Site.
- 3.2.2 With regards then to surface water, it is considered that as a result of on-site features, there 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 residential development. This has included the proposed retention and management of existing site boundary features, as per the existing outline planning permission.

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 D below provides an extract of those records applied to the Carmarthen locality. The red star denotes the position of the Alternative Site.



Plan D

4.1.3 As can be seen from the above, the Alternative Site does not form part of and neither is it near any national or local designations. In addition, it is sufficient distance from the nearest designation to ensure that it 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 Site indicated by a red star.

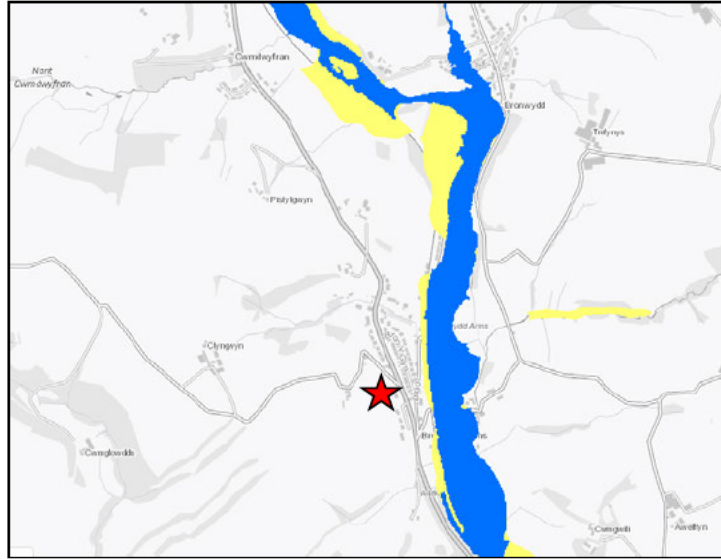


Plan E

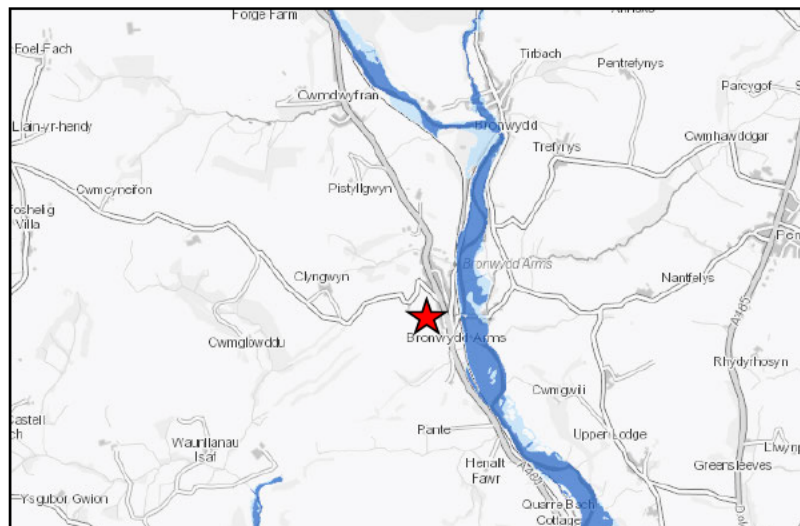
4.2.2 As can be seen, neither the Alternative Site nor immediately adjoining element of the settlement includes any Scheduled Ancient Monuments, Listed Buildings or Conservation Area's. As a result, the development of the Site would not have any detrimental impact on the setting or interest of any nearby historical asset.

4.3 ENVIRONMENTAL CONSTRAINTS

4.3.1 The 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, as illustrated by the plans below (Alternative Site indicated by the red star).



Plan F
(Development Advice Maps)



Plan G
(Flood Maps for Planning)

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

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 In terms of the Alternative Site, no less than two viability appraisals have been prepared and produced for the proposed development put forward by this report, with the most recent accompanying this submission. As can be seen from the accompanying Appraisal – which was fundamental in granting outline planning consent – the scheme put forward has been demonstrated to be viable.
- 5.1.3 In terms of deliverability, we note the comments of the Council in their Site Assessment document with regards to the Alternative Site (as an existing allocation). The Council expressed the view that “*There are concerns regarding the deliverability of the site. The site represents a longstanding residential allocation.*”. However, it should be noted that the failure to deliver any new units on the Site has not been at the fault of our Client, but that of the Council in taking 13 years to issue a planning consent.
- 5.1.4 With the consent now issued, our Client has begun undertaking further detailed design work with the aim of preparing a reserved matters application due course, as the Site is clearly a viable and deliverable form of residential development.

6.0 NATIONAL PLANNING POLICY CONSIDERATIONS

6.0.1 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.

6.1 HOUSING SUPPLY

6.1.1 With regards to the provision of housing, Paragraph 4.2.2 of PPW gives the following requirements the planning system must fulfil:

- *Identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;*
- *Enable the provision of a range of well designed, energy efficient, good quality market and affordable housing that will contribute to the creations of sustainable places; and*
- *Focus on the delivery of the identified housing requirement and the related land supply*

6.1.2 In addition to the above, Paragraph 4.2.10 of PPW states “*the supply of land to meet the housing requirement proposed in a development plan must be deliverable*”. As detailed previously, it is considered that the LPA has to date failed to accomplish this requirement under the provisions of the current LDP and will continue to do so under the provisions of the proposed allocations of the 2nd Deposit LDP.

6.1.3 In order therefore to re-dress this deficiency in provision, and provide a more robust approach to housing provision through a mixed site-scale approach, there is an urgent need to identify alternative deliverable housing allocations in the replacement Plan. Based on the accompanying information, it is clear that the Alternative Site represents one such example.

7.0 CONCLUSION

- 7.1 Although currently undeveloped, the Alternative Site 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. These are in fact views shared by the Council due to it finally recently issuing an outline planning permission for the Site's development.
- 7.2 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.
- 7.3 From a wider sense, the Site also benefits from well served excellent public transport links to the adjoining larger town of Carmarthen, 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.
- 7.4 In tandem to the above, the development of the Site will in turn ensure a viable and so deliverable source of future housing for the settlement and wider Cluster it forms part of, 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.
- 7.5 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.

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