	Mr Derrick Phillips,	
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# Carmarthenshire Local Development Plan (LDP)

Representation on Second Deposit Revised LDP

Associated Candidate Site Submission:

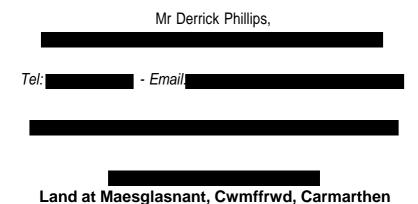
Land at Maesglasnant, Cwmffrwd, Carmarthen

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#### 1. Introduction

This submission is a response to Carmarthenshire County Council's call for representations on its Second Deposit Revised Local Development Plan (LDP). The submission objects to the lack of development opportunities in Cwmffrwd and proposes the inclusion of land at Maesglasnant, Cwmffrwd for residential development.

Various options have been submitted. The options could be developed individually or part of a wider phased development. The submission therefore offers flexibility to the Council with regards the quantum of development. The land offers the opportunity to bring forward much needed housing in a village where residential land is highly sought after. It would also offer the opportunity to build upon the success of the Maesglasnant estate which was developed following its allocation in the extant adopted LDP. It would also bring forward an array of public benefits.

The suggested options for development are as follows:

- Option 1: Land to East of LDP Allocation SC18/H3/SuV5/h1
- Option 2: Land to South and East of LDP Allocation SC18/H3/SuV5/h1
- Option 3: Land North East of LDP Allocation SC18/H3/ SuV5/h1
- Option 4: Land North-East and East of LDP Allocation SC18/H3/ SuV5/h1
- Option 5: Land North-East, East and South of LDP Allocation SC18/H3/ SuV5/h1

The extent of development possible through each option is to be negotiated with Council representatives.

The need and associated benefits, is set out in detail below.

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#### 2. The Need for the Development

The Carmarthenshire LDP was adopted by the Council in December 2014 and since that date the Council has failed to satisfy a number of its housing objectives, as monitored through its LDP Review Report.

Despite this, the LDP allocation at Maesglasnant (formerly referred as LDP Residential Allocation SC18/H3, but referred as Second Revised Deposit Residential Allocation SuV5/h1) is very close to being built out, reflective of the success of the allocation.

The site has been delivered much faster than anticipated and this is a clear indication of the need for development in the area. It is also inevitable that this need will become particularly accentuated through the proposed Second Deposit Replacement LDP as no new allocations are proposed within Cwmffrwd. Rather, an allocation to the rear of St. Anne's Church car park has been omitted as an allocation. Whilst this is clearly the correct decision given the inability to bring the land forward for development, it should be replaced to avoid a housing void for the forthcoming development plan period. As a viable and deliverable site, with no significant site constraints, the land at Maesglasnant is clearly capable of filling this void.



### 3. Sustainability, Compatibility with Spatial Strategy and Other Benefits

The 'Preferred Spatial Option' identified through the proposed Second Deposit Replacement LDP is described as a 'Balanced Community and Sustainable Growth Strategy'. The village of Cwmffrwd has been identified as a 'Tier 3: Sustainable Village'. The strategy promoted by the Council seeks to, amongst other things, provide opportunities for rural areas and recognize that growth should be deliverable and orientated to a community's needs and market demand.

As set out in Section 2 above, the need and market demand in Cwmffrwd is acute, with no new allocations. It is therefore unclear how the 'Balanced Community and Sustainable Growth Strategy' has been applied to the village of Cwmffrwd. This is particularly confusing given the clear deliverability benefits on offer at the land promoted at Maesglasnant.

Cwmffrwd is located only a short distance from the 'Regional Centre' of Carmarthen and therefore offers a sustainable option for growth relative to a number of the other cluster settlements identified in the same category. Indeed, significant weight should be attributed to the fact that Cwmffrwd is located within close proximity to the wide variety of facilities and services located in and around Carmarthen, Pensarn and Pibwrlwyd.

The village is accessible by a reliable bus service and via the cycleway and pedestrian footpath along the A484.

It is inevitable that a proportion of trips from Cwmffrwd to Carmarthen would involve the use of the private car. However, as such trips are limited in terms of distance, the development of the site would provide significant environmental and sustainability advantages over those settlements located in more remote locations.

Within this context, it is worth noting that, amongst other things, Cwmffrwd offers a sustainable location:

- Approximately 2 miles of the extensive facilities and services on offer within Carmarthen;
- Approximately 0.9 miles from the education facilities at Pibwrlwyd, including Pibwrlwyd College and Ysgol Bro Myrddin;

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- Approximately 1.5 miles to the broad range of facilities and services at Llangynnor/ Pensarn;
- An extensive and reliable bus services along the A484 and Heol Bolahaul;
- A cycleway and pedestrian footway from the village to Carmarthen town centre and Morrisons supermarket (and associated retail developments);
- Nursery/ crèche facilities and services;
- · A variety of places of worship; and
- A Royal Mail post box.

It is therefore contended that a residential allocation within Cwmffrwd would be justified and in accordance with the sustainability principles that underpin national planning policy set out within PPW. It is also submitted that, based on the foregoing, a level of growth in excess of that allocated in the adopted LDP would be justified.

Without the residential allocation of additional land at Maesglasnant, it is submitted that the cluster model referred within the Plan would fail to benefit the area, to the detriment of the local people.

Mr Derrick Phillips,	

## 4. Site Deliverability and Viability

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The land that constitutes the Candidate Site comprises greenfield agricultural land that abuts the adopted LDP allocation SC18/H3. Given the lack of any available previously developed land within the area, the development of the land would be justified by the sequential approach advocated by PPW. As set out above, it would also be consistent with the overarching strategy of the adopted LDP.

The site incorporates no insurmountable constraints, is not affected by the phosphate issue that represents a significant constraint for a number of the other development options in the area. The land is not contaminated, is within close proximity to existing infrastructure and would not therefore include any abnormal development costs that would impact upon site viability and ultimately its deliverability. Indeed, the largely unrestricted development opportunity would not only enable the delivery of much needed residential development to the area, but would also be sufficiently viable to deliver the full suite of planning obligations considered necessary, including the a contribution to the chronic shortage of affordable housing in the area, the provision of public open space, significant highway improvements and necessary financial contributions towards education provision and other community benefits.

A detailed viability assessment could be provided upon request. However, the delivery of the residential properties at the neighboring site (LDP allocation SC18/H3 – Land at Maesglasnant) illustrates that the site is located within a good market area whilst also demonstrating viability. The development would assist in easing the pent-up demand for housing within the area which largely stems from the lack of allocated sites in Cwmffrwd in previous development plans.

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# 5. Candidate Site – The Development Options

As set out above, 5No. development options are submitted for consideration. The options are not mutually exclusive or definitive and negotiations with representatives of the Council would be welcomed.

The suggested development options are set out on the following pages:

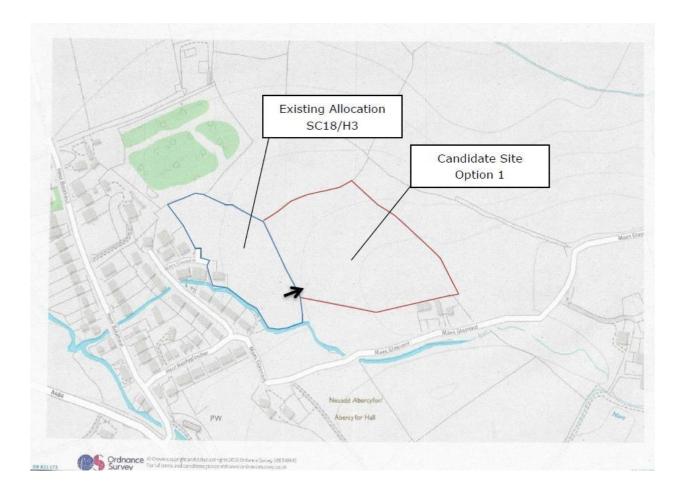
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#### Option 1: Land to East of LDP Allocation SC18/H3

Development Option 1 relates to the parcel of land located directly to the east of the adopted LDP allocation at Maesglasnant which is near completion (Ref: SC18/H3 or Second Deposit Replacement LDP Ref: SuV5/h1). The site has the capacity to provide numerous properties, depending upon the Council's preference with regards to housing density.

Access would be achieved directly from the existing allocation at Maesglasnant via the existing agricultural access located to the south of No. 28 Maesglasnant. The access, which is currently paved up to the field entrance, remains within the control of the site proponent and could be designed to meet the standards set by Technical Advice Note 18: *Transport* (TAN18) and Manual for Streets.

Given the lack of site constraints, the ease of access and the availability of utilities infrastructure within close proximity to the site, the site would be fully policy compliant should the site be allocated, including the provision of affordable housing and any contributions necessary as per the Council's planning obligation requirements. All field boundaries could be retained to retain the rural character of the area and to provide a network of green infrastructure.

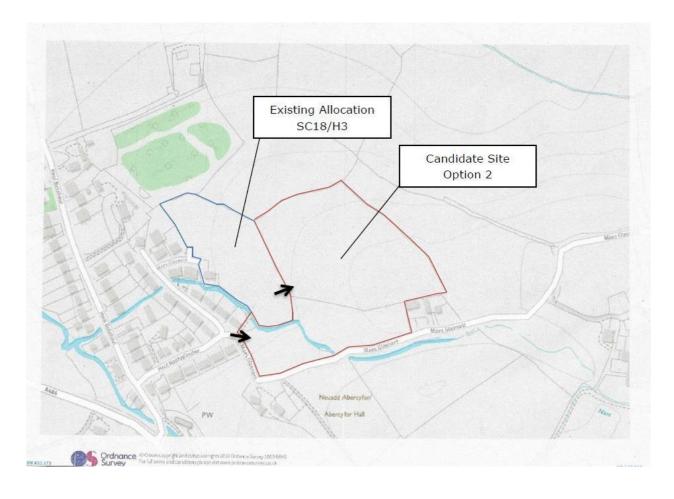


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#### Option 2: Land to South and West of LDP Allocation SC18/H3

The second development option is similar to Option 1, but also includes the small field parcels to the south and south west of the existing allocation. The advantage of this option is that there would be potential for two separate points of access if that would be considered desirable to the Highways Authority. Specifically, the access proposed in Option 1 could be utilised whilst a second option could potentially be delivered at the corner between Heol Nantyglasdwr and Heol Maesglasnant. Again, all options are open and at the discretion of the Council.

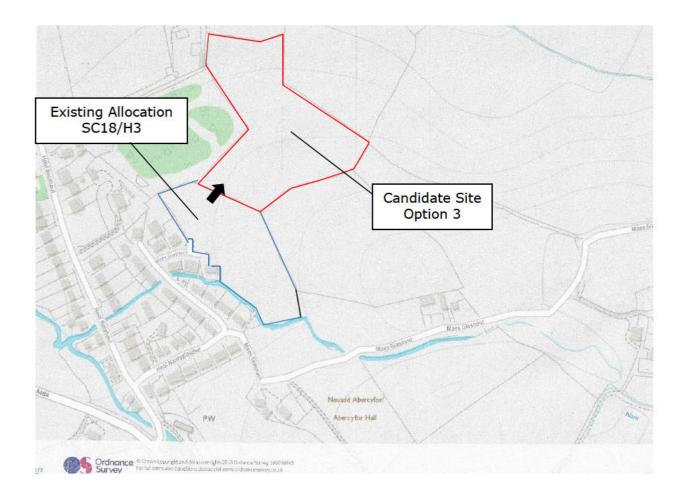
The development of this site would also provide the opportunity for a much needed passing bay or new highway realignment/ bridge along Heol Maesglasnant. The full suite of planning obligations could be delivered as part of the development, to the benefit of the local community, whilst existing field patterns could be retained as far as practical through the retention of existing hedgerows and trees.



Option 3: Land North East of LDP Allocation SC18/H3

Development Option 3 offers the opportunity to develop the field parcel located to the north east of the existing Maesglasnant allocation. It represents a greenfield site and includes no significant site constraints and could therefore be delivered with the full suite of obligations.

Access could be achieved directly from the existing allocation via an existing agricultural access (as illustrated below). This access point is undevelopable given a 6 metre easement associated with the foul sewer infrastructure serving the new dwellings on the existing allocation although the strip of land could be utilised as a highway. Such a proposal would not therefore prejudice the delivery of the existing allocation.

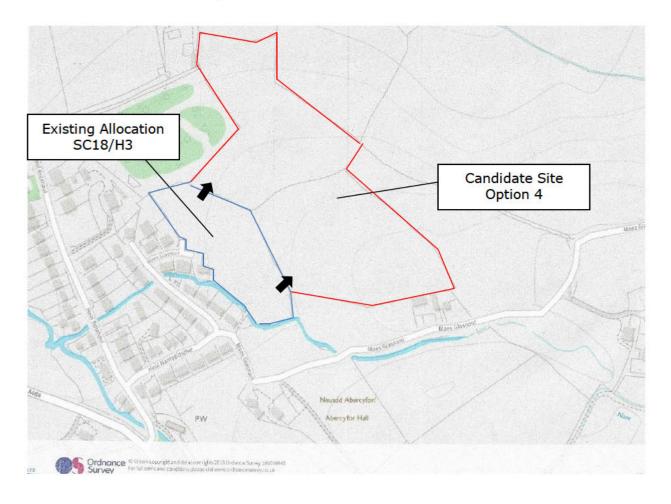




Option 4: Land North-East and East of LDP Allocation SC18/H3

Development option 4 would include the two field parcels submitted under Options 1 and 3 below.

As previously set out, these sites offer significant community benefit and are not constrained in anyway. Two points of access (as illustrated below and referred above) are also available.



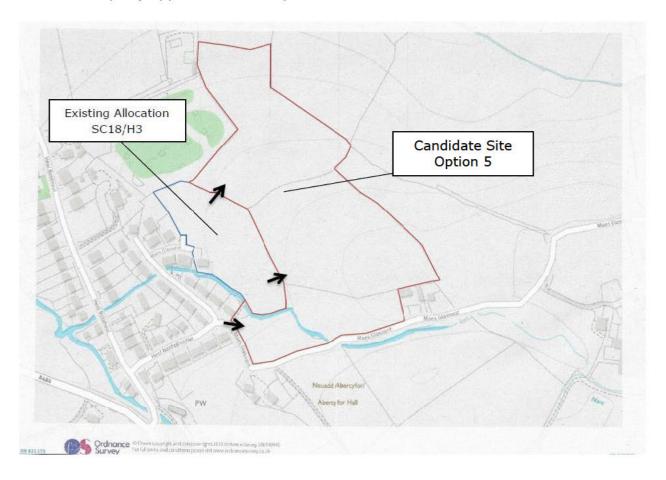
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#### Option 5: Land North-East, East and South of LDP Allocation SC18/H3

Development Option 5 would incorporate all of the land proposed under the other development options referred above. The area of land would therefore have the capacity todeliver a significant number of dwellings.

Again, the site would not incorporate any significant site constraints and, given the economies of scale, would have potential to provide substantial planning obligations, including a substantial contribution towards affordable housing for local people.

The access points offered through the other development options would be equally applicable to this option.



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#### 6. Conclusion

In summary:

- The development opportunities proposed in Cwmffrwd is insufficient to meet an identified need.
- The existing allocation at Maesglasnant is near completion and therefore offers little benefit for the forthcoming development plan period
- The land identified through Options 1- 5 above is deliverable and economically viable.
- The development would provide a range of public benefits through the planning obligations and would assist in sustaining Cwmffrwd as a cluster village.
- The land is relatively sustainable within close access to sustainable modes of transport and a plethora of nearby facilities and services.
- The site has no significant constraints and, notably, is not affected by the phosphate issues that are impacting on other areas covered by the LDP.

If you require any further information, please do not hesitate to contact me.

Signed:

Derrick Phillips
SITE PROPONENT