

Carmarthenshire Revised
Local Development Plan
2018-2033
Second Deposit Revised LDP
Submission

**Land at Coleg Sir Gâr
Pibwrlwyd**

April 2023



Summary

Proposal

Carmarthenshire Second Deposit Revised LDP Submission

Location

Pibwrlwyd, Carmarthen

Date

March 2023

Project Reference

S23.111

Client

Coleg Sir Gâr

Product of

Asbri Planning Limited

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1. Introduction

- 1.1 This representation has been prepared in relation to Carmarthenshire County Council's consultation on the 'Second Deposit Revised Carmarthenshire Local Development Plan' (2018-2033). The representation is submitted on behalf of Coleg Sir Gâr in regard to 'Land at Pibwrlwyd Campus, Carmarthen'.
- 1.2 The representation is accompanied by the requisite Representation Form and is submitted to the Authority within the statutory consultation period (by the deadline for representations of 14th April 2023).
- 1.3 A number of submissions have been made by Coleg Sir Gâr in regard to Land at Pibwrlwyd Campus over the course of the preparation of the Revised Carmarthenshire LDP, including most recently, representations to the First Deposit Revised Plan in March 2020. All representations have been made in close liaison with the Authority, with partnership working characterising the positive progression of the proposed allocation through the LDP process. In continuation of this approach, further representations are submitted to the Second Deposit Revised LDP.
- 1.4 It should be noted that this Second Deposit Revised LDP representation is to be followed by the submission of further site/allocation-specific documents (comprising Concept Masterplan; Development Viability Model and accompanying Viability Statement; and Statement of Common Ground). This has been discussed and agreed with officers, with significant progress being made. Alongside the submission of information to inform the LDP preparation process, the College is also progressing with the marketing of the site, establishing key development instigators for the delivery of infrastructure, alongside the submission of a Strategic Outline Case for transforming the College facilities at Pibwrlwyd via the Welsh Government's Mutual Investment Model initiative.

2. Overview

- 2.1 Within the First Revised Deposit LDP, the site (referred to as 'Pibwrlwyd, Carmarthen') was allocated for a mix of uses under PrC1/Mu2 which states that provision *"includes a mix of uses reflecting its strategic location and contribution to Carmarthen. Uses include employment, commercial leisure, education associated with Coleg Sir Gâr and residential (an allowance is made for 245 new homes)"*. The site boundaries follow the Adopted Plan employment/education led allocation (GA1/MU2), but with the additional provision for residential and commercial leisure uses.
- 2.2 Within the Second Revised Deposit LDP, the site continues to be identified as a Mixed-Use Site under PrC1/Mu2, with the same policy wording retained, other than an amendment to the number of new homes: *"includes a mix of uses reflecting its strategic location and contribution to Carmarthen. Uses include employment, commercial leisure, education associated with Coleg Sir Gâr and residential (an allowance is made for 247 new homes)"*.
- 2.3 As per the representation submitted to the First Revised Deposit LDP, the site's inclusion as a mixed-use allocation in the Second Revised Deposit LDP is supported, and in particular the acceptance of the residential component of the allocation. It is confirmed that the amended figure included within the policy text in the Second Deposit in relation to the number of new homes (247 units) is supported.
- 2.4 In summary, Coleg Sir Gâr continues to support the Second Deposit Revised Plan on the basis that the Council have accepted the principle of residential uses at the scale proposed, whilst also allowing for an appropriate and viable mix of other uses. The College looks forward to working in partnership via a Statement of Common Ground with the Council and delivering this important mixed used development opportunity, that in itself will facilitate and partly fund the transformation of post 16 education in Carmarthenshire.

3. Background to the Site

- 3.1 As established through previous representations, the proposed strategic site includes all the College owned land north of Pibwrlwyd Lane along with the undeveloped part of Parc Pensarn to the north, together with a wedge of land along the A48 Trunk Road. To the south of Pibwrlwyd Lane the site includes the existing campus but excludes further land in the ownership of the College which extends further south. As such, the strategic site boundaries (within the 1st and 2nd Deposit Plans) follow the Adopted Plan employment/education led allocation (GA1/MU2), but with the additional provision for residential uses.
- 3.2 The background to the requirement to include residential development within the strategic site proposals has been set out fully in previous submissions. In summary, the proposals for residential use were derived in the context that there is a requirement to source significant funding in order to transform the poor-quality condition of the estate at Pibwrlwyd. The only realistic proposition to achieve this scale of change is via the Welsh Government's Mutual Investment Model initiative, which in itself is a very costly commitment over a 25-year period. The imperative to maximise returns on the wider Pibwrlwyd site is therefore crucial, especially given that there is limited potential to realise this exciting vision on the College's other sites (Graig Llanelli, Ammanford, Jobswell Road Carmarthen, and Gelli Aur) due to flood zone, capacity issues and the unavailability of suitable land. As such, the only site with redevelopment opportunities to realise such transformational change for the College is the Pibwrlwyd site. The uses proposed in the adopted LDP would not generate sufficient capital value to allow the development of new facilities at the College. Thus, a need was identified to extend the range of uses on the land to secure additional value. Furthermore, as part of the wider Masterplan proposal, the College would aim to develop the landholding with the view of establishing collaborations in terms of land uses e.g. occupiers of the business incubators and creating academic linkages e.g. added value with developers.
- 3.3 On the above basis, a new strategy was derived on behalf of the College in 2016, which included a review of the Capita masterplan (October 2014), the preparation of a new draft masterplan to include an element of residential development, and the commissioning of a phase 1 ecology survey of the site to identify likely scopes of habitats on the site. As part of this process a pre-application consultation exercise was held with Carmarthenshire County Council. This was aimed at seeking the views of the Council on the submission of an outline planning application which would incorporate retail and residential elements. However, the Council expressed concerns regarding issues of prematurity and components being contrary to policy. Nevertheless, the feedback received in terms of matters which needed to be addressed, was useful in progressing proposals. Consequently, it was decided that promotion of the residential elements be pursued via the Candidate Site process. A Candidate Site representation was submitted in August 2018. The proposals promoted through the Candidate Site exercise were described as 'mixed use development (residential, hotel, care village, commercial and retail uses)'.
- 3.5 On the above basis the provision within the First Deposit (and continued provision within the Second Deposit Plan to which these representations relate) to include a mix of uses including employment, commercial, leisure, education, and an allowance for residential development (245 new homes in the First Deposit and 247 in the current/Second Deposit) under Policy PrC1/Mu2 continues to be welcomed and supported.

4. Update/Progress Following Representations to the First Revised Deposit LDP

4.1 The College have commissioned a significant amount of further supporting work to inform the proposed allocation since the previous iteration of the Deposit Plan was published in March 2020. Detailed discussions have been held between the College and Carmarthenshire Council during this intervening period.

4.2 The following further site-specific information is to be submitted (in follow up to this Second Deposit Revised LDP representation) to further inform, and allow for a robust site allocation to be included in the Revised LDP:

- Proposed Concept Masterplan
- Development Viability Model and Supporting Viability Statement
- Statement of Common Ground

Masterplanning Exercise

4.3 As a result of a comprehensive masterplanning exercise carried out by Powell Dobson Architects, the site characteristics, including topography, views in and out, constraints and individual parcels have been examined and options considered. The following principles have been identified:

- College redevelopment and extension along the southern boundary, to create a visual and physical relationship with the south campus.
- Retail unit located along the north-western boundary, being close to retail park and seen from A484.
- Remaining land at the north is identified for commercial development, to create a transition between the existing retail park and the new homes.
- Residential use will occupy the centre of the site and on the highest levels, benefiting from south and west orientation.
- A new public space (park) would be created at the highest point as an amenity area.
- Marshy land with the stream will remain undeveloped as an ecological feature.
- Main vehicular circulation is proposed via a distributor road with an improved access to the site from the A484 roundabout, defining the separation between the residential use with the other uses. This will link with other access points via the commercial/ industrial areas. The road layout will also extend to an improved Pibwrlwyd Lane to ensure permeability of movement.
- Existing hedgerows and trees are to be retained as much as possible to ensure wildlife corridors.

Viability

4.4 Coleg Sir Gâr have purchased the Burrows Hutchinson viability assessment model and have commissioned an independent viability study (by Elev8 Land and Property). A separate study on utilities provision and requirements in terms of upgrades has been carried out which has fed into the viability exercise. The completed DVM and supporting Viability Statement will be submitted to the LPA. Furthermore, work on the marketing of the site will inform and clearly define the viability and deliverability of the sites. The intention is to define development partner(s) for the site.

Retail Proposal

4.5 The College have been in negotiations with a discount retailer in relation to the potential relocation to the land to the rear of the Halfords store. The opportunity on offer not only provides an instigator for the delivery of the wider development site, but as part of the potential deal, a new highway opening would be

provided. Subject to the support of the Council, the proposed Masterplan would incorporate a limited retail allocation (covering only this proposal), so as not to detract from the town centre offer. As a catalyst, this proposal is subject to a Pre-Application Enquiry submission that is currently being considered by the Council. The inclusion of this designation has been discussed with the Council in terms of the updating of the Masterplan submission, but its acceptability will be considered as part of the Pre-Application Enquiry discussions and the drafting of the Statement of Common Ground.

Marketing

- 4.6 The College has been approached by numerous interested parties for the land uses proposed within the Masterplan. To quantify and maximise this interest in line with Charities Act requirements, the College is currently in the process of preparing to soft market the site. The outcome of this would be to define development partner(s) for individual sites (non College related), or establish a Joint Venture partnership. As part of this, the College will hold discussions with the Welsh Government and the Council in order to maximise the opportunity by defining grant opportunities focusing on e.g. business incubator units.

5. Second Revised Deposit LDP – Integrated Sustainability Appraisal (February 2023)

5.1 The Integrated Sustainability Appraisal (February 2023) undertaken by the Authority in relation to the Second Revised Deposit LDP indicates that the mixed-use site at Pibwrlwyd performs well against the defined sustainability criteria, with a number of ‘positive’ and ‘very positive’ outcomes identified (as shown in the extract from the ISA Report below).

Figure 1: ISA Summary – Pibwrlwyd (PrC1/MU2)

Site Ref	Name	ISA1	ISA2	ISA3	ISA4	ISA5	ISA6	ISA7	ISA8	ISA9	ISA10	ISA11	ISA12	ISA13	ISA14	ISA15
PrC1/MU2	Pibwrlwyd	+	-	+/-	+	+/-	+/-	-	0	+/-	++	+	+/-	+	++	++

5.2 It is the case that a ‘negative’ outcome is identified in relation to ISA 2 (Biodiversity) and ISA 7 (Soil). It is noted that all greenfield allocations perform negatively against the ISA 2 and ISA 7 criteria.

5.3 In regard to biodiversity matters, an updated Extended Phase 1 Habitat survey was undertaken in January 2021 (further to 2016 survey) which identified a limited range of habitats present at the site. Habitats considered of greatest ecological importance to the site include the mature broad-leaved trees, which were assessed to have varying potential to support roosting bats and the hedgerows, tree lines and stream which have potential to support foraging/commuting/nesting birds, foraging/commuting bats and other small mammals. As part of the local green infra-structure (GI) network, these features are to be retained as far as possible and kept as part of the development so as to maintain habitat connectivity and provide wildlife corridors to allow for continued movement of mammals such as foraging bats, Badger & Hedgehog around and through the site.

5.4 Opportunities for local biodiversity enhancement also exist at the site. Hedgerows damaged by grazing sheep could be strengthened with new native scrub/tree planting or with species of a known benefit to biodiversity. Other enhancement measures could include the inclusion of bat and bird boxes onto new buildings and retained trees; the creation of 130mm x 130mm gaps at the bottom of any garden and boundary fencing as to allow continued connectivity through the candidate site for Hedgehog and other small mammals; and the use of native species in any soft landscaping scheme and the management of retained grassland so as to enhance the habitat for local birds and invertebrates.

6. Consideration of Tests of Soundness

6.1 It is considered that the Second Revised Deposit Plan meets the three Tests of Soundness, which must be satisfied in order for a development plan to be considered 'sound' and able to be recommended for adoption.

6.2 The proposals for the Pibwrlwyd site are in conformity with the three Tests of Soundness as discussed below in the context of the site and the proposals involved.

Does the Plan Fit? (i.e. is it consistent with other plans?)

6.3 The proposals are compatible with the National Development Framework, and particularly 'Policy 24 – Regional Centres' which states that Carmarthen, along with the other identified towns in Mid and South-West Wales, will be the focus for managed growth, reflecting their important sub-regional functions. Regional and local development plans should recognise the roles of these settlements.

Is the Plan appropriate? (i.e. is it appropriate for the area in the light of evidence?)

6.4 The proposals have been derived from evidence submitted with the earlier Candidate Site together with previous engagement with the Council and earlier evidence which formed part of the adopted LDP evidence base which is still relevant.

Will the Plan deliver? (i.e. is it likely to be effective?)

6.5 The College has firm proposals to redevelop the existing Pibwrlwyd campus and the other elements of the scheme proposed will complement this in a phased delivery over the plan period. Significant interest has been expressed for the site and the College will align this to inform and evidence Plan preparation.

6.6 In summary:

- The Second Revised Deposit LDP policy and allocation relating to Site PrC1/Mu2 is founded on robust evidence and provides an appropriate planning framework to deliver new homes within the context of a mixed-use allocation in accordance with the overarching vision and objectives of the Plan, as part of a development to come forward over the Plan period.
- The policy and allocation allows for the controlled and sustainable development of the site and is supported by a detailed technical review of relevant settlement boundaries and landscape characteristics, as well as of the individual opportunities and constraints relating to the site.
- Coleg Sir Gâr consider that the Second Revised Deposit LDP is sound and entirely appropriate in so far as it relates to the site. The proposals for the site are consistent with LDP policy, and capable of delivering a financially viable, sustainable form of development.
- Such a development is considered to accord with the requirements of the Well-being of Future Generations (Wales) Act 2015, and provides an opportunity to contribute towards delivering economic, social, and environmental improvement.

7. Conclusion

- 7.1 This Second Revised Deposit Plan submission document has been prepared in order to accompany the Representation Form completed in respect of Land at Pibwrlwyd, Carmarthen. It is submitted on behalf of Coleg Sir Gâr.
- 7.2 The proposed strategic land allocation under Policy PrC1/Mu2 which provides for a range of uses including residential, is supported, as is the overall soundness of the Plan.
- 7.3 The College have previously developed a land use strategy and masterplan options for the site, to include a mix of potential uses, including residential, education and commercial uses. The objective is for the College to maximise a capital receipt from the sale of the land, in order to reinvest the money into redeveloping the Pibwrlwyd Campus for post 16 education facilities.
- 7.4 This Second Revised Deposit Plan submission fully supports the proposed allocation, and in particular welcomes provision for 247 dwellings.
- 7.5 The submission of further site/allocation-specific documents, comprising Concept Masterplan; Development Viability Model and accompanying Viability Statement; and Statement of Common Ground, is to follow this overarching representation of support on the Second Revised Deposit Plan, which will further detail and reinforce the viability of the proposed allocation. Furthermore, the outcomes of the marketing exercise will further emphasise the deliverability of the proposal and ensure that the potential of the designation is fully maximised.
- 7.6 The College looks forward to working in partnership with the Council on a Statement of Common Ground, so that the site allocation can be developed aligned with the aspirations of both parties.