

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

**Land off Heol Y Parc,
Cefneithin**

April 2023



Summary

Proposal

Carmarthenshire Second Deposit Revised LDP Submission

Location

Land off Heol Y Parc, Cefneithin

Date

April 2023

Project Reference

S20.253

Client

NBA Developments Ltd

Product of

Asbri Planning Limited

220 High Street

Swansea SA1 1NW

Prepared by

Iwan Rowlands – Graduate Planner

Approved by

Richard Bowen – Director

Disclaimer

This report has been prepared for the sole and exclusive use of NBA Developments Ltd for whom it was commissioned and has been prepared in response to their particular requirements and brief. This report may not be relied upon by any other party.

The Contracts (Rights of Third Parties) Act 1999 shall not apply to this report and the provisions of the said Act are expressly excluded from this report. This report may not be used for any purpose other than that for which it was commissioned. This report may not be reproduced and/or made public by print, photocopy, microfilm or any other means without the prior written permission of Asbri Planning Ltd.

The conclusions resulting from this study and contained in this report are not necessarily indicative of future conditions or operating practices at or adjacent to the Site. Much of the information presented in this report is based on information provided by others. That information has neither been checked nor verified by Asbri Planning Ltd.

Contents

1. Introduction
2. Overview
3. Update/Progress Following Representations to the First Deposit Revised LDP
4. Review of Integrated sustainability Appraisal
5. Review of Tests of Soundness
6. Conclusions

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 NBA Developments Ltd in regard to 'Land off Heol Y Parc, Cefneithin`.
- 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 submission was made by NBA Developments Ltd in regard to land off Heol Y Parc, Cefneithin over the course of the preparation of the Revised Carmarthenshire LDP, including most recently, a letter submitted to Carmarthenshire's Forward Planning department concerning the proposed allocation of this site in the deposit Revised LDP 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 Plan; Development Viability Model and accompanying Viability Statement; and Statement of Common Ground). This has been discussed and agreed with officers.

2. Overview

- 2.1 Within the First Revised Deposit LDP, the site (referred to as 'Land off Heol Y Parc, Cefneithin') which was allocated for residential use under PrC3/h8 which makes a provision for 18 units during the plan period.
- 2.2 Within the Second Revised Deposit LDP, the site continues to be identified as residential allocation under PrC3/h8 for the same quantum of development.
- 2.3 As per the representation submitted to the First Revised Deposit LDP, the site's inclusion as a residential allocation in the Second Revised Deposit LDP is supported.
- 2.4 In summary, NBA Developments Ltd continues to support the Second Deposit Revised Plan on the basis that the Council have accepted the principle of residential use development. NBA Developments Ltd looks forward to working in partnership via a Statement of Common Ground with the Council and delivering this site for much needed residential development within the settlement of Cefneithin which forms part of the Ammanford/Cross Hands principal centre.
- 2.5 The client, NBA Developments Ltd are a well-established local developer who have consistently provided high quality housing projects around Cross Hands over several years, and have liaised with the local authority to provide several affordable units as part of their work. There is an urgent need to secure continuity of work for the business and the site itself is owned by the developer, who has all infrastructure available and assures the site can be delivered within the plan period.
- 2.6 In terms of housing allocations within the deposit plan under Policy HOM1, there are a number of allocations in Cross Hands which have been built out and completed providing nearly 200 dwellings (PrC3/h11, PrC3/h12 and PrC3/h13). In fact, allocation PrC3/h12 (Land adjoining A48 and Heol y Parc) has now been completed by the client in addition to the Central Garage allocation in nearby Tumble (PrC3/h29). In order to ensure business continuity, maintaining this site as an allocation is critical. The site owner is keen for the site to be developed in the short term, and this will provide much needed housing in the settlement of Cefneithin

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

3.1 NBA Developments Ltd are now in the process of commissioning 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.

3.2 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:

- Updated Site Plan;
- Updated Ecology Report;
- Outline drainage strategy;
- Development Viability Model and Supporting Viability Statement;
- Statement of Common Ground.

Updated Site Plan

3.3 A layout was previously prepared showing a mixture of dwellings totalling 18 units. There was scope to increase this number if detached dwellings are replaced with 2 and 3 bed semi-detached units.

Viability

3.4 NBA Developments Ltd will seek to purchase the Burrows Hutchinson viability assessment model and commission an independent viability study. The completed DVM and supporting Viability Statement will be submitted to the LPA.

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

4.1 The Integrated Sustainability Appraisal (February 2023) undertaken by the Authority in relation to the Second Revised Deposit LDP indicates that the residential allocation at land off Heol Y Parc, Cefneithin 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 – land off Heol Y Parc, Cefneithin (PrC3/h8)

Site Ref	Name	ISA1	ISA2	ISA3	ISA4	ISA5	ISA6	ISA7	ISA8	ISA9	ISA10	ISA11	ISA12	ISA13	ISA14	ISA15
PrC3/h8	Tir oddi ar Heol y Parc / Land off Heol y Parc	+	-	+/-	+	+/-	+/-	-	0	+/-	++	+	+	+	+	++

4.2 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.

4.3 Previous ecological surveys have not shown any constraints that pose barriers to the allocation of this parcel of land for housing or future development as all ecological issues can be dealt with through reasonable mitigation, compensation and enhancement measures.

4.4 Category 2 sandstone covers just under half of the site, however the resource at this site is considered to be already largely sterilised as it is within 200m of sensitive development. Whilst no major issues have been flagged up within the SFCA, part of this site is at risk of Surface Water Flooding caused by a small watercourse running through the site. It is considered likely that a suitable site layout and detailed drainage design can be produced which seeks to mitigate any risk through good engineering design and if necessary locates highly vulnerable development outside of the area at risk of flooding.

5. Consideration of Tests of Soundness

5.1 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.

5.2 The proposals for the land off Heol Y Parc, Cefneithin 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?)

5.3 The proposals are compatible with the National Development Framework, and particularly 'Policy 24 – Regional Centres' which states that Cefneithin forming part of the Ammanford/Cross Hands principal centre, 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?)

5.4 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?)

5.5 NBA Developments Ltd are very keen to deliver the site as promised. They have been responsible for developing several plots of land within Cross Hands and its surrounding areas, including allocations for 24 and 9 dwellings respectively in Tumble and Cefneithin within the deposit plan (PrC3/h29 & PrC3/h12). The client is committed to developing the Cefneithin allocation as it will ensure business continuity for them, whilst providing a valuable contribution towards housing in the area.

5.6 In summary:

- The Second Revised Deposit LDP policy and allocation relating to site PrC3/h8 is founded on robust evidence and provides an appropriate planning framework to deliver modest new homes within the context of the village of Cefneithin where new development has been limited over recent times, in accordance with the overarching vision and objectives of the Plan, as part of a development to come forward over the Plan period. It is imperative that this housing allocation is delivered as it is the sole one within Cefneithin for the deposit plan.
- 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.
- NBA Developments Ltd 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.

6. Conclusion

- 6.1 This Second Revised Deposit Plan submission document has been prepared in order to accompany the Representation Form completed in respect of land off Heol Y Parc in Cefneithin. It is submitted on behalf of NBA Developments Ltd.
- 6.2 The proposed residential land allocation under Policy PrC3/h8 which provides for a modest scale of new residential development, is supported, as is the overall soundness of the Plan.
- 6.3 This Second Revised Deposit Plan submission fully supports the proposed allocation. Furthermore, the development of other allocations within the deposit plan in nearby areas puts added emphasis on the delivery of this housing allocation. 3 allocations within Cross Hands have been built out recently, whilst another was completed recently by the client in Tumble. This further emphasizes that the client has great credentials when it comes to delivering housing allocations within the area.
- 6.4 The submission of further site/allocation-specific documents, comprising an updated site plan and ecological appraisal, 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.
- 6.5 NBA Developments Ltd 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.