



Geraint John Planning

Geraint John

E: [REDACTED]

T: [REDACTED]

M: [REDACTED]

www.geraintjohnplanning.co.uk

14th April 2023

Forward Planning
Carmarthenshire County Council
5-8 Spilman Street
Carmarthen
Carmarthenshire
SA31 1JY

Dear Sir/Madam,

Carmarthenshire 2nd Revised Local Development Plan 2018-2033 – Deposit Plan Representations

New Site Allocation – Former Penybont Farm, Cwmann

Please find enclosed, on behalf of and under instruction from our client, Datblygau Davies Developments, a detailed Site Representation, submitted to Carmarthenshire County Council for consideration for inclusion within the 2nd Revised Local Development Plan (LDP).

The site has not previously been submitted as a Candidate Site, and therefore these representations seek for the site to be included as a new employment allocation within the Revised LDP. Accordingly, an objection is also made to the Deposit Plan on the basis that the site is not included, and we would therefore request to be heard by the Inspector at Examination.

To enter the site for evaluation as a new allocation within the Plan preparation process, the following documentation is enclosed with this submission:

- Completed Representations Form;
- Site Location Plan (ref. LP01);
- Illustrative Layout (ref. A1 LA); and
- Flood Consequences Assessment (May 2018).

In addition to the enclosed documentation, a detailed case for the site's allocation within the Revised LDP as an employment allocation is provided in the Addendum below - which is requested to be carefully and thoroughly taken into consideration in appraising the site's credentials for inclusion within the new Plan.

In the absence of any methodology for the assessment of new allocations, we have reverted to the criteria and methodology outlined within the Site Assessment Methodology (September 2022). This outlines that the appraisal process consists of multiple stages, summarised as the following:

- Stage 1 – Initial Site Assessment
- Stage 2 – Detailed Site Assessment
 - Stage 2a – Deliverability & Fundamental Constraints
 - Stage 2b – Further Detailed Analysis of Sites
- Stage 3 – ISA & HRA

The representations have been structured to respond to the pertinent questions of Stages 1 and 2, in addition to provide a preliminary assessment against Stage 3, in order to evidence the suitability of the site as an employment allocation. It is considered that the site would make a valuable contribution to housing land supply within the County.

We look forward to hearing from you in due course. In the meantime, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Yours sincerely



Geraint John
Director
Geraint John Planning Ltd



Preface

The site is a parcel of previously developed land, approximately 1.5 hectares in size, located adjacent to the settlement of Cwmann at the intersection between the A485 and A482. The site formerly contained a farm house and outbuildings associated with Penybont Farm, but is now vacant, comprising an area of hardstanding and benefitting from existing access from the A485 (associated with planning permission ref. TMT/02448).



Aerial view of site



Street view of site and existing access

Part of the site is subject to several planning permissions for non-residential use, as summarised in the table below. Permission ref. TMT/0244 has been implemented through formation of the aforementioned site access and creation of hardstanding areas and footings, and remains extant as a result.

Application Ref	Site Name	Site Description	Decision	Decision Date
W/01002	Site of Former Penybont Farm, Cwmann, Carmarthenshire.	Service Station including forecourt sales building, petrol pumps and canopy, car wash bay and jet wash bay.	Approved	24/11/1997
TMT/02448	Site of Former Penybont Farm, Cwmann, Carmarthenshire.	Service Station including forecourt sales building, petrol pumps and canopy car wash & jet wash bay, renewal of W/01002.	Approved	21/11/2002
W/31378	Site of former Penybont Farm, Carmarthen Road, Cwmann, Carmarthenshire.	Proposed siting of a Neighbourhood Retail Convenience Store (Amendment to Planning Permission TMT/02448)	Approved	30/06/2022

The settlement of Cwmann is primarily residential, albeit also contains some retail and business premises, including the cluster of units located immediately to the east of the site. To the south and south-west of the site are residential dwellings and a former public house, and to the north and west are agricultural fields. The town of Lampeter is located less than 1 km to the north of the site, and contains a variety of facilities and services, including employment, education and retail uses.

A land use plan is provided below which shows the location of the site in respect of other principal non-residential uses (i.e. commercial / business / retail / employment premises):



Land use plan

Given its location adjacent to Cwmann and in close proximity to Lampeter, the site is located in both a sustainable and accessible location, being situated on two primary highway networks routes – the A482 and A485. The site is also readily accessible on foot via a wide footway which provides a continuous route to both Cwmann and Lampeter. Additionally, there are two bus stops within 100m of the site, which are serviced by two of the main bus services in the locality – number '585', which provides services to Carmarthen, and the 'T1', providing regular services to Aberystwyth and Carmarthen via Lampeter.

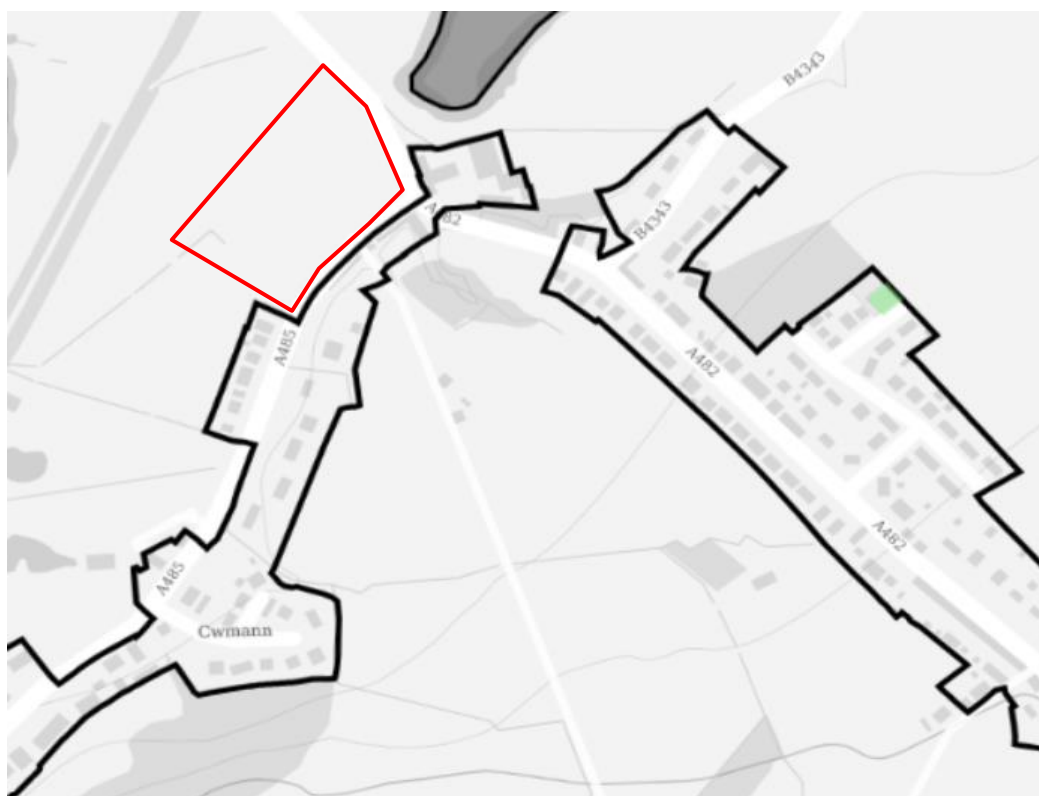
New Site Allocation Representations

Stage 1 – Initial Site Assessment

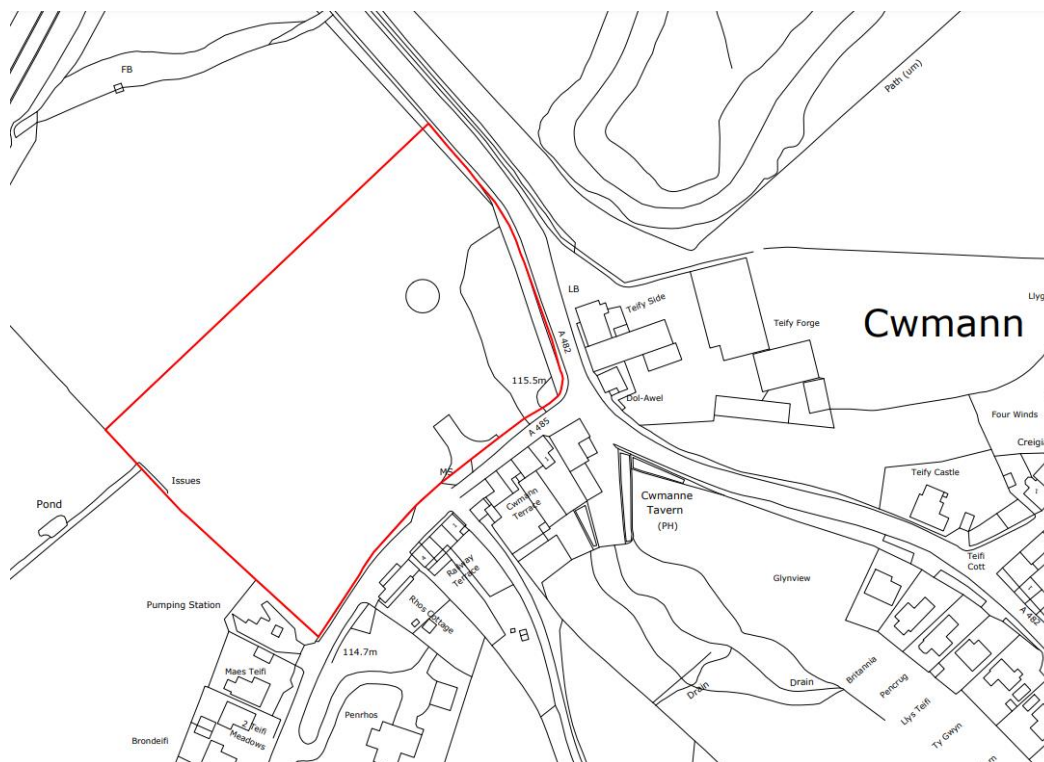
Q1. Is the site compatible against the location of future growth presented in the Preferred Strategy.

The location of the site directly relates to a settlement identified as a Sustainable Village (Tier 3) within the Deposit Plan. The Plan seeks to apportion growth largely to the Tier 1-3 settlements. Whilst the Plan sets out a preference for residential development within the Tier 3 settlements, the site comprises previously development land which benefits from planning permissions (refs. TMT/02488 and W/31378) for non-residential use. As such, the development of non-residential use at this location is acceptable in principle. Moreover, as illustrated on the extract of the Proposals Map and Site Location Plan overleaf, the site has a clear physical relationship with Cwmann, and as such is located within a sustainable location.

Given the above, it is considered that the proposed allocation of the site for employment is compatible with the growth strategy, and specific consideration should be given to its inclusion as part of the Plan preparation accordingly.



Deposit LDP Proposals Map



Extract of Site Location Plan

Stage 2 – Detailed Site Assessment

Stage 2a – Deliverability & Fundamental Constraints

Q2. Can the site accommodate 5 or more dwellings?

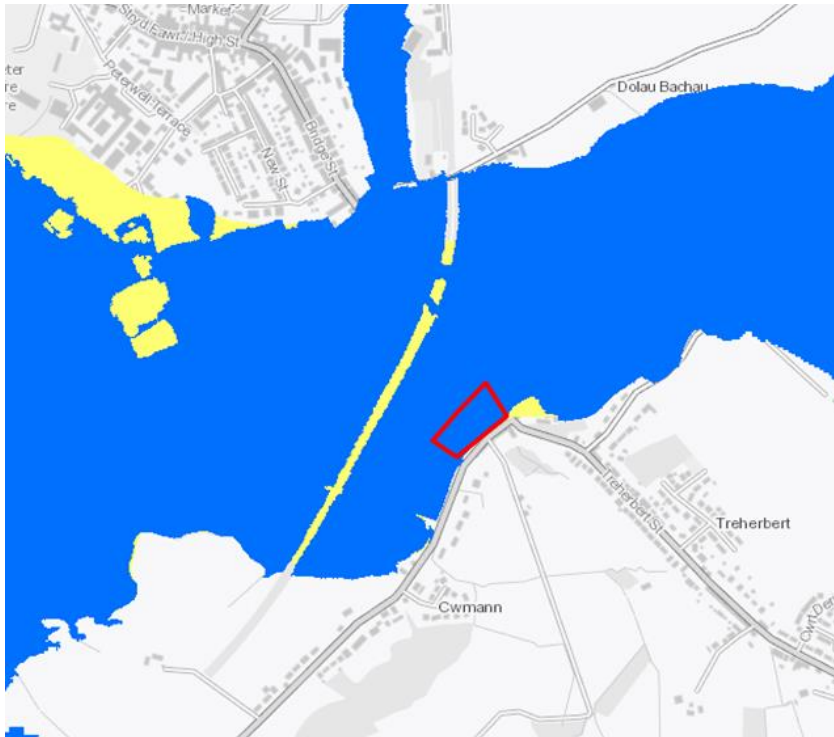
The site is proposed for employment use, and comprises a total area of circa 1.5 hectares. As demonstrated by the submitted Illustrative Layout, the site can comfortably accommodate 23,000 sq ft of floorspace, along with access and parking, drainage and Green Infrastructure, with scope for future development. As such, the site is considered to be sufficient in size to be considered as an Alternative Site.

Q3. Is the site within, or directly relates to an identified settlement in Tiers 1-3 of the LDP Preferred Strategy?

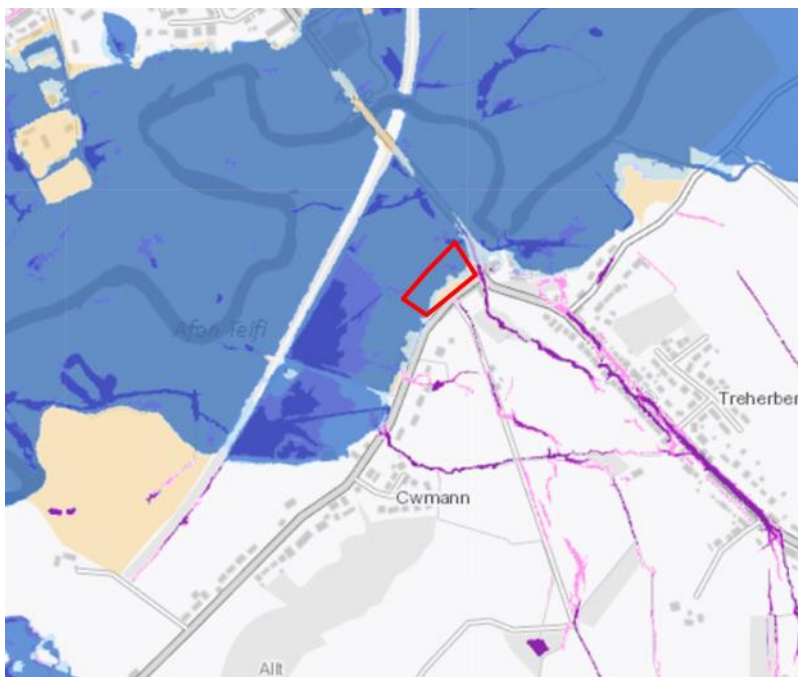
Yes – as outlined above in greater detail, the site is located immediately adjoining the Tier 3 (Sustainable Villages) settlement of Cwmann.

Q4. Is the site located within a flood risk zone as identified in the TAN 15 Development Advice Maps (DAMs)?

The site is entirely contained within Flood Zone C2 on the Development Advice Map. However, the site is contained within Flood Zone 3 and Flood Zone 2 on the New Flood Map for Planning, which represents the latest flood risk modelling.



NRW Development Advice Map



NRW New Flood Map for Planning

The site has extant planning permission for a service station (ref. TMT/02448) and recent planning permission for a convenience store (ref. W/31378). A Flood Consequences Assessment (May 2018) by Francis Sant was submitted in support of ref. W/31378, in addition to extensive flood modelling work and dialogue held with Natural Resources Wales (NRW). The FCA set out the following conclusions:

'NRW's 2D hydraulic model suggest that part of the site is expected to remain flood free even during the Q1000 event although part of the site could be at risk during the Q100 event. To ensure that the site remains flood free during all considered events it is proposed to raise the site levels. To evaluate the impact the NRW TUFLOW model was obtained, amended, and ran with and without the scheme in place. Modelling showed that this had no detrimental impact on third parties (impact on flood depth less than 5mm). A flood free access from the site is also expected during the considered events.

The development is not expected to be at risk from tidal, surface water, or ground water flooding. It's also not expected to be at risk from reservoir failure.

A summary of the adherence of the development with the requirements of Section 7 and Appendix A1 of TAN 15 is summarised in Table 5.1.'

	Requirement	Comment
1	Is the development flood free during a Q100 event	Yes.
2	Is the flood depths at the development less than 1000mm during a Q1000 event	Yes. Expected to be flood free.
3	Is the flood velocity at the development less than 0.3m/s during a Q1000 event	Yes. Expected to be flood free.
4	Is the flood depths on the access route less than 1000mm during a Q1000 event	Yes
5	Is the flood velocity on the access route less than 0.45m/s during a Q1000 event	Yes
6	Is the maximum rate of rise of flood waters less than 0.3m/hr	Not on site
7	Is the maximum speed of inundation of flood risk area less than 2hrs	No. Site is not expected to flood
8	Will the development have an impact on third parties	No (impact on flood depth less than 5mm).
9	Will there be a loss of flood storage capacity	Potentially a comparatively small amount considering the size of the floodplain

In summary, the FCA confirms that the proposed 'use' would not be highly vulnerable, and that the site is not expected to be at risk during any events. Flood proofing measures, as outlined within the FCA, would be adopted nonetheless, to protect the proposed development and ensure no wider flooding impacts.

NRW were ultimately satisfied with the findings of the FCA and that the proposals for a less vulnerable use would be acceptable in this location on flood risk grounds, with the adoption of mitigatory measures. Important to note is that this conclusion was drawn prior to consideration of the lesser flood risk indicated on the New Flood Map for Planning, which is to be adopted in the near future.

Given the above, it is not considered that flood risk represents an insurmountable constraint to development of the site, not least as it benefits from an extant and recent planning permissions. Notwithstanding this, a FCA would be submitted with any planning application.

Q5. Is the site located within or immediately adjacent to any sites for importance to nature conservation?

No – the site is not located within or immediately adjacent to any sites for importance to nature conservation, as corroborated by the interactive Constraints Map.

Q6. Is the site located within or immediately adjacent to any Scheduled Monuments?

No – review of Historic Wales mapping database shows that there are no Scheduled Ancient Monuments or Listed Buildings on or within the vicinity of the site.

The mapping does identify a Historic Environment Record on the site – the former Pen-Y-Bont Farmstead, albeit this has historically been demolished. As such, it is not considered that there are any heritage constraints to development.



Historic Wales mapping

Stage 2b – Further Detailed Analysis of Sites

Q7. Would development of the site be contrary to general planning principles?

The site represents a logical and proportional extension to the settlement boundary, being located immediately adjacent to the existing settlement limits of Cwmann. Whilst located within the 'countryside', the site is not subject to a Green Wedge designation, and as such development in this location would not lead to any coalescence of settlements. Moreover, the site comprises part previously developed land, which is preferred to greenfield in PPW11. On this basis, the site location is considered to conform with general planning principles.

Q8. Would development of the site result in detrimental impact on the character and setting of the settlement or its feature?

The site is not located within a designated landscape protection area (for example, Special Landscape Area), or within a Conservation Area or settlement with particular architectural merit. Being previously developed, the site has historically contained built form and therefore development in this location would not be out of character with the site and surrounds. Views of the site from the east, south and west are largely limited due to development and vegetation, whilst from the north and north-east, the site is viewed within the context of the existing built form. Accordingly, it is considered that with sensitive development, there would be no detrimental impact on the character or setting of Cwmann.

Q9. Will the proposal involve the re-use of suitable previously developed land/buildings?

Yes – the site comprises previously developed land – the former Penybont Farmhouse and outbuildings, which have been demolished historically. The site is now vacant, and occupied by a piece of hardstanding, representing an underused parcel of brownfield land.

Q10. Is the site accessible from the existing public highway?

Q11. Does the site have an available access point with adequate visibility?

Q12. Have any significant and evidenced highway issues been identified relating to the site?

A joint response is here provided to Qs. 10-12. The site benefits from an existing high-spec access from the A485, which was approved under planning permission ref. TMT/02448, and would be retained as part of any development proposals, in addition to consideration of a potential secondary access. The access has adequate visibility to the east and west, and is located sufficient distance from the junction with the A482.

The suitability of the existing access was assessed by the Local Highways Authority at the time of application, and was deemed to be acceptable on highways safety grounds. The proposed employment use would see lesser vehicle movements from the approved service station and retail store, and as such is considered to have capacity to accommodate development without any issues. A new transport assessment or similar would form part of any future planning application.

Q13. Does the site have a suitable access to public transport and/or active travel route?

The site is readily accessible on foot via a wide footway which provides a continuous route to both Cwmann and Lampeter. In terms of public transport, there is a bus stop located circa 50m to the existing entrance to the site, which is serviced by one of the main bus services in the locality – number '585', which provides services to Carmarthen. There is another bus stop, approximately 70m to the south-west of the site, which is serviced by the 'T1', providing regular services to Aberystwyth and Carmarthen, via Lampeter. The site is therefore located within a sustainable location, and can be reasonably accessed via alternative means of transport to the public vehicle.

Q14. Is the site within a reasonable distance to areas of population and housing?

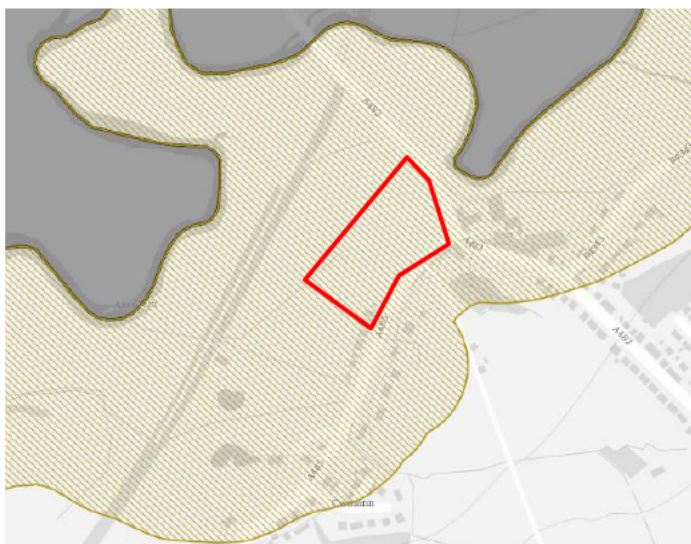
The site is located immediately adjacent to the settlement of Cwmann, within a residential and commercial mixed use area. Additionally, the site is located less than 1km from the town of Lampeter, and as such, has an accessible and sizeable employment pool.

Q17. Is the site located within or adjacent to a mineral buffer zone?

No – the LDP Constraints Map does not show that the site is located within or adjacent to a mineral buffer zone.

Q18. Is the site located within a Mineral Safeguarding Area?

The LDP Constraints Map indicates that the site lies within a Sandstone and Igneous Safeguarding Category 1 area. This is not considered to be a fundamental constraint to development as the resource is unlikely to be viable to extract, given the prior use of the site and proximity to existing residential properties.



LDP Constraints Map

Q19. Is the site within or immediately adjacent to an Air Quality Management Area (AQMA)?

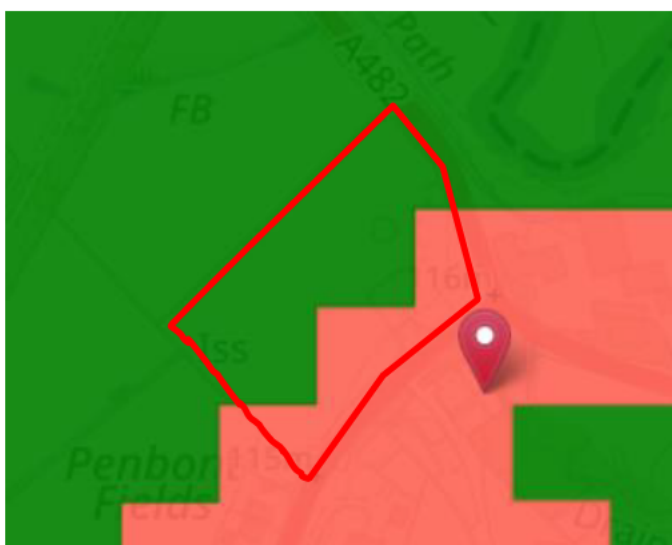
No – the site is not located within or immediately adjacent to an AQMA, or an area affected by poor air quality.

Q20. Does the site contain high carbon soil e.g., peatlands?

The site is not known or thought to contain any high carbon soil, and this was not raised as an issue at the prior planning permissions.

Q21. Does the site contain high quality agricultural land (grade 1, 2, 3a)?

The Lle Agricultural Land Classification map site is partly classified as 'urban', and partly as 'Grade 3a'. As such, the site does not contain any of the highest grade 'Best and Most Versatile' land. Moreover, the site (excluding the hardstanding) is currently only used for grazing, and therefore its development will not result in the loss of active agricultural land used for delivering crops for food and non-food uses.



LLE Agricultural Land Classification map

Q22. Is the site located within or immediately adjacent to any Regionally Geological and Geomorphological Sites?

No – the LDP Constraints Map does not show that the site is located within or adjacent to a Regionally Geological or Geomorphological Sites.

Q23. Are there are significant concerns set out in the SFCA (Strategic Flood Consequences Assessment) – Stage 1 which could impact on the delivery of the site?

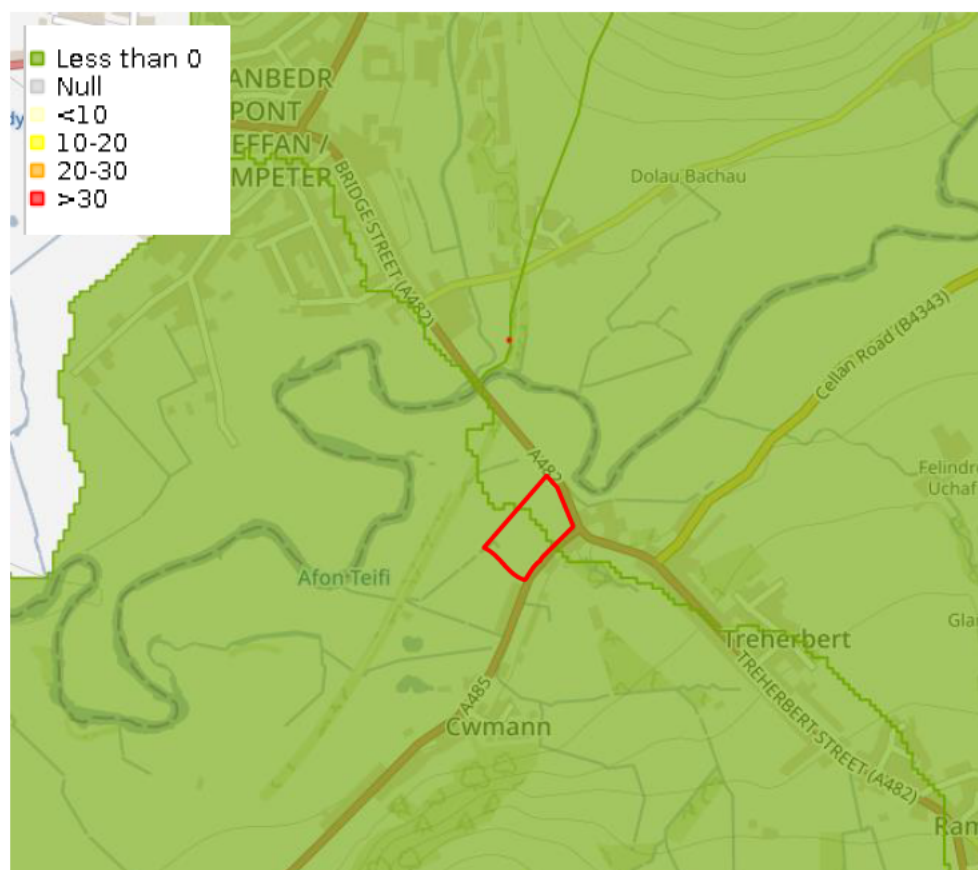
Please refer to discussion further above under Q4. in respect of flood risk.

Q24. Does the site have an available water connection?

Yes – the site is expected to have readily available water connections, given its previously developed status. Dwr Cymru Welsh Water confirmed the ability to provide a water supply to the site through their consultation responses to application ref. W/31378, in which no objection was raised.

Q25. Is the site within or adjacent to a phosphate sensitive SAC catchment?

The site is located within a Phosphorus Sensitive SAC Freshwater Catchment area. However, it is located within an area compliant with Phosphorus targets.



NRW Compliance Assessment map

Q26. Does the site have connections to other infrastructure requirements?

Yes – the site is expected to have readily available electricity and other infrastructure connections, given its previously developed status. Moreover, infrastructure providers (namely, Dwr Cymru Welsh Water, and Wales and West Utilities) raised no objection to proposed development ref. W/31378.

Q27. Does the location and/or scale of the site have the potential to have a detrimental impact on Welsh Language?

It is not considered that development of the site would lead to any adverse impacts on the Welsh Language due to the nature and scale of the development. An employment site in this location would provide employment opportunities for local residents. Notwithstanding this, further assessment of any potential impact on the Welsh Language would be provided with any planning application, as deemed necessary by the LPA.

Q28. Has the applicant provided sufficient evidence to show the development is deliverable and financially viable?

The site is also available for development, and has had some speculative prospective occupier interest. The site promoter is willing and able to submit the necessary viability information to demonstrate the financial viability of the site upon request. It is not considered likely that there will be any unforeseen or abnormal costs associated with development of the site, particularly in respect of contamination as the site has been restored/remediated following its previous use.

Q29. Has the applicant provided sufficient evidence to identify when the site will be brought forward for development?

Further detail and confirmation of the delivery of the site in respect of the Plan period can be provided by the site promoter, however it is envisaged that the site would be brought forward for development in the short term. The site promoter is actively looking to make the necessary planning applications in order for the site to be developed at the earliest opportunity – as demonstrated by the recent planning permission.

Summary

It has been demonstrated above that there are no insurmountable constraints to development of the site, which would represent an appropriate employment site and extension of the settlement boundary. Moreover, the site comprises previously developed land and benefits from an existing extant permission for a non-residential use. As such, the site should be considered a 'reasonable' option, and should progress to the Stage 3 assessment accordingly.

Stage 3 – ISA and HRA

ISA (Integrated Sustainability Appraisal)

An assessment of the sites performance against the Stage 1 and 2 criteria, has been undertaken in the table overleaf. This seeks to provide an overview of the effect of development of the site in achieving the Plan's Sustainability objective, although it is of course acknowledged that the LPA would need to undertake their own assessment.



Consideration	Yes / No	ISA Score
Stage 1 – Initial Assessment		
1. Is the site compatible against the location of future growth presented in the Preferred Strategy?	✓	+
Stage 2a – Initial Detailed Site Assessment		
2. Can the site accommodate 5 or more dwellings?	N/A	
3. Is the site within or directly related to a Tier 1-3 settlement in the Preferred Strategy?	✓	
4. Is the site located within a flood risk zone as identified in the TAN 15 Development Advice Maps?	✓	-
5. Is the site located within or immediately adjacent to any sites designated for importance to nature conservation?	X	+
6. Is the site located within or immediately adjacent to any Scheduled Monuments?	X	+
Stage 2b – Further Detailed Site Assessment		
7. Would development of the site be contrary to general planning principles?	X	
8. Would development of the site result in detrimental impact on the character and setting of the settlement or its feature?	X	+
9. Will the proposal involve the re-use of suitable previously developed land/buildings?	✓	+
10. Is the site accessible from the existing public highway?	✓	
11. Does the site have an available access point with adequate visibility?	✓	
12. Have any significant and evidenced highway issues been identified relating to the site?	✓	
13. Does the site have a suitable access to public transport and/or active travel route?	✓	+
14. Is the site within a reasonable distance to areas of population and housing?	✓	+
17. Is the site located within or adjacent to a mineral buffer zone?	X	+
18. Is the site located within a Mineral Safeguarding Area?	✓	-
19. Is the site within or immediately adjacent to an Air Quality Management Area (AQMA)?	X	+
20. Does the site contain high carbon soil e.g., peatlands?	X	+
21. Does the site contain high quality agricultural land (grade 1, 2, 3a)?	✓	-
22. Is the site located within or immediately adjacent to any Regionally Geological and Geomorphological Sites?	X	+
23. Are there any significant concerns set out in the SFCA (Strategic Flood Consequences Assessment) – Stage 1 which could impact on the delivery of the site?	-	-
24. Does the site have an available water connection?	✓	
25. Is the site within or adjacent to a phosphate sensitive SAC catchment?	✓	-
26. Does the site have connections to other infrastructure requirements?	✓	
27. Does the location and/or scale of the site have the potential to have a detrimental impact on Welsh Language?	X	+
28. Has the applicant provided sufficient evidence to show the development is deliverable and financially viable?	✓	
29. Has the applicant provided sufficient evidence to identify when the site will be bought forward for development?	✓	

It is evident that the site scores well against all but few criteria, as listed below:

- Flood Risk;
- Mineral Safeguarding;
- Agricultural Land Classification; and
- SAC Catchment

As has been demonstrated earlier within this report (namely, in response to Questions 4, 18, 21 and 25 respectively), these issues would not be insurmountable to delivery of the site. Moreover, that the flood risk can be suitably overcome, as per the extant planning permission. Detailed and technical evidence and assessment work would be submitted with any planning application to support this conclusion.

In summary, and on balance, the site clearly scores well against the pertinent site assessment criteria, and therefore complies with multiple sustainability Objectives.

HRA (Habitats Regulations Assessment)

It is acknowledged that the Stage 3 assessment involves screening by the LPA of all potential allocations for any likely significant effects (alone and in-combination) on any European Sites – as outlined within the Habitats Regulations Report (January 2020).

As set out elsewhere in this submission, the site is not located within or adjacent to any nature conservation designations, including European Sites. The River Teifi, which has a SAC designation, is located further to the north of the site, approximately 200m at its closest point. However, there are no water courses or estuaries which flow in/out of the site, which forms the basis for the generic level of screening, as set out in the Report. Additionally, whilst the site does lie within a Phosphorus Sensitive SAC Freshwater Catchment area, this is indicated by the NRW Compliance Assessment map to be compliant with Phosphorus targets.

Whilst the LPA may deem that the site would need to go undergo further assessment, for the reasons above, it is considered that initial screening would conclude no likely significant effects on the River Teifi SAC resulting from development of the site itself.

Conclusions

We consider that the site 'performs' well against the defined assessment criteria and methodology, with no evident insurmountable constraints, obstacles, or failings.

Our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters.

We respectfully urge you, for the reasons given herein and in the associated submitted information, to include the site put forward within the emerging LDP for a new employment allocation.