



REPRESENTATION STATEMENT

2nd DEPOSIT CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN **2018-2033**

**LAND AT HEOL BLAENHIRWAUN
DREFACH, CROSS HANDS
CARMARTHENSHIRE, SA14 7AJ**

**On behalf of
Celtic Properties and Developments Ltd.**

**Our Ref: 2075.c/CLJ/23
Date: March 2023
Prepared by: CLJ**

Email: [REDACTED]

Web: www.jcrplanning.com

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OBJECTION SITE: OVERVIEW

This objection submission has been prepared in respect of the 2nd Deposit Carmarthenshire Local Development Plan (LDP) and in order to demonstrate that the development of an area of land at Heol Blaenhirwaun, Drefach, Cross Hands, has the potential to contribute to the strategic aims and objectives of the replacement Carmarthenshire Local Development Plan.

This submission seeks an amendment to the specific alignment of the Carmarthenshire Local Development Plan development limits in the vicinity of Heol Blaenhirwaun. The objection site directly abuts an area of land subject of a current planning permission for residential development. This submission requests that the plan be revised to include this part of Drefach within the development limits and thus provide for the future housing and community needs of the local area.

1.0 INTRODUCTION

- 1.0.1 JCR Planning Ltd. has been instructed by ‘Celtic Properties and Developments Ltd.’ (the landowner) to prepare a representation objection site submission in respect of the 2nd Deposit Carmarthenshire Local Development Plan (LDP) and an area of land at Heol Blaenhirwaun, Drefach, Cross Hands. The purpose of the submission is to seek the site’s allocation for residential development and important community uses in the forthcoming replacement Carmarthenshire Local Development Plan (2018 – 2033).
- 1.0.2 This submission has been prepared in accordance with the Local Authority’s Revised Carmarthenshire Local Development Plan published guidance documents. The contents of this submission therefore address the relevant criteria within these documents, thus allowing a considered determination and evaluation.
- 1.0.3 Recognition has also been given to ensuring that this formal submission complies with the guidance and requirements of Planning Policy Wales and associated Technical Advice Notes, and other advisory guidelines issued by the Welsh Government.
- 1.0.4 This submission provides a comprehensive case for the allocation of the objection site for residential development purposes and should be considered in conjunction with the accompanying illustrative site layout plan. A red line identifies the spatial extent of the objection site in *Figure 1*.
- 1.0.5 In order to assist the Local Planning Authority in its deliberations, JCR Planning is prepared to supply any additional information that may be required and to arrange for a site inspection if deemed necessary.

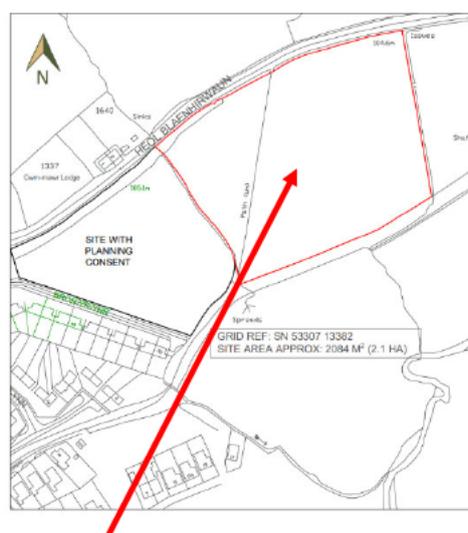


Fig. 1 – Objection site boundary in the context of Drefach

2.0 SITE CONTEXT

2.1 THE OBJECTION SITE

2.1.1 The objection site and its relationship to Drefach is shown in the ‘Ordnance Survey’ extract at *Figure 2*.



Fig. 2 – Relationship of objection site to settlement of Drefach

2.1.2 *Figure 3* provides more detail with a red line identifying the spatial extent of the objection site and its relationship with the immediately adjoining land subject of planning consent for residential development. The objection site measures approximately 2.1 ha.

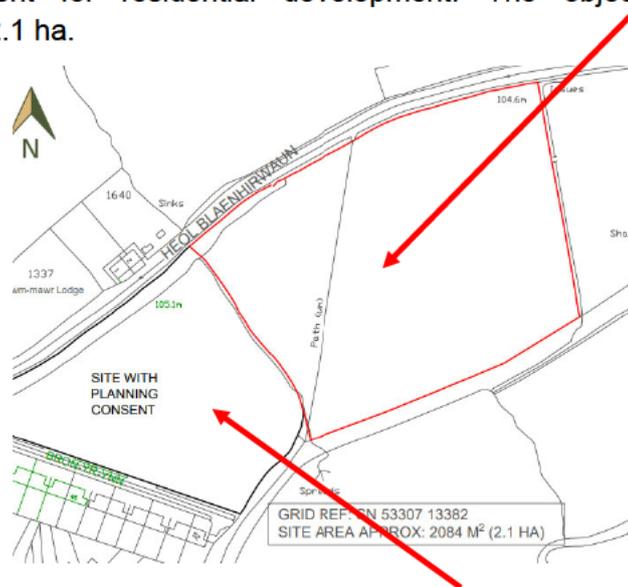


Fig.3 – Objection site boundaries and adjacent land with planning permission

- 2.1.3 *Figure 4* provides an aerial image of the objection site and its surroundings, clearly demonstrating its ideal location in respect of proximity to Drefach Primary School, existing built form and being situated between the adjacent planning consent and existing outlying development. The site is also within convenient walking distance of Drefach’s many services and facilities.

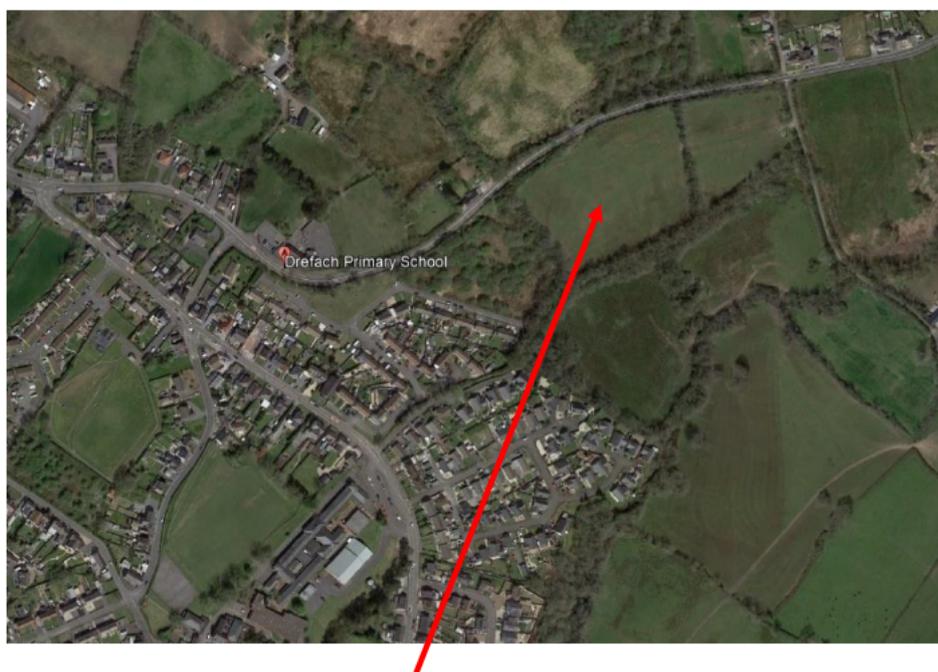


Fig. 4 – Aerial view of objection site in relation to adjacent built form

- 2.1.4 The objection site is located to the east of Drefach’s centre and is well-related to the established built form. The field that adjoins its western boundary is subject of planning permission for residential development. The site’s northern boundary is formed by Heol Blaenhirwaun which links the major employment hub of Cross Hands with the county’s largest market town, Carmarthen, via the B4310. The site’s southern and eastern boundaries are formed by adjoining agricultural land.
- 2.1.5 The objection site is ideally situated in terms of proximity to the nearby primary school (approximately 0.14 miles). The general area is characterised by a mix of residential dwelling styles that take advantage of the road frontage aspect, with more recent housing schemes comprising in-depth developments.
- 2.1.6 The relationship of the objection site to the immediately adjacent highway is shown in *Figures 5 and 6*. For the purposes of this submission, the accompanying illustrative layout (*Figure 9*) shows an access into the site from the immediately adjacent Heol Blaenhirwaun. The road alignment at this point provides good horizontal and vertical

visibility in both directions, allowing the site to be served by a safe and efficient access. The anticipated level of traffic generated by the additional residential development at this location will not create any highway capacity or safety problems. The Local Planning Authority itself is unlikely to raise any specific highway issues related to the development of this site, given the adequacy of potential visibility splays.



Fig. 5 – Visibility along Heol Blaenhirwaun towards the east



Fig. 6 – Visibility along Heol Blaenhirwaun looking west

- 2.1.7 The objection site measures approximately 2.1ha and has been extensively grazed. The site does not contain any landscape or other physical features of note. Any boundary trees will be protected during the development phase. Any trees that do need felling will be replaced by mitigating tree planting on a ‘three trees for each one felled’ basis.



Fig. 7 – General view of objection site’s agricultural grazing use

2.1.8 In summary therefore, there is no physical amenity feature within or adjacent to the objection site that will prevent its appropriate future and efficient development.

2.2 SETTLEMENT SUSTAINABILITY AND SITE SETTING WITHIN THE 2ND DEPOSIT LOCAL DEVELOPMENT PLAN

2.2.1 The settlement of Drefach is identified within the 2nd Deposit LDP as forming part of the Tier 1 Principal Centre of Cross Hands, under strategic policy SP3 ‘Sustainable Distribution – Settlement Framework’. The plan confirms that the majority of development will be directed towards the top tiers of the settlement framework hierarchy, and therefore, by definition, the site’s sustainable development credentials are already formally acknowledged and confirmed.

2.2.2 More specifically, in terms of accessibility, Drefach has regular bus services (128, 129, 164, 166) linking it with three major employment centres - nearby Cross Hands to the east (approx. 1.7 miles), Carmarthen to the north-west (approx. 7.8 miles) and Llanelli to the south (approx. 6.8 miles). Nearby Cross Hands offers a wide range of employment, retail and leisure facilities.

2.2.3 The objection site is ideally and centrally located in terms of walking distance from the centre of Drefach and proximity to its services and facilities, including primary school, village shops, post office, local public houses and Chapels, sports/recreation facilities

and Mynydd Mawr Country Park. Secondary education is available in nearby Cefneithin (approx. 1.5 miles to the east), with tertiary available at Carmarthen and Llanelli.

- 2.2.4 The 128, 129, 164 and 166 bus services provide regular access to Cross Hands, Carmarthen and Llanelli, as well as a number of other settlements. The public transport hubs of Carmarthen and Llanelli provide access to a number of other towns and cities via a wider network of bus services, including Swansea and Haverfordwest, whilst mainline rail services are also available. Heart of Wales rail services are available at nearby Ammanford. Drefach enjoys ease of access to the strategic highway network being in close proximity to the main A48 dual carriageway linking West Wales with the M4 and beyond.
- 2.2.5 The strong sustainable development credentials of Drefach should therefore be given full recognition and consideration when determining potential future growth options.
- 2.2.6 *Figure 8* contains an extract from the 2nd Deposit LDP's Proposals Map for Drefach which shows the spatial strategy proposed for this part of the Cross Hands Tier 1 Principal Centre.



Fig. 8 – 2nd Deposit LDP extract showing planned growth in relation to the objection site

- 2.2.7 In terms of planned residential growth, Drefach has been afforded three allocations (brown shading) in the 2nd Deposit Plan (PrC3/h15, PrC3/h14 and PrC3/h16), two of

which (PrC3/h15 and Prc3/h16) are very limited in size, with 7 and 6 no. dwellings respectively. The third allocation (PrC3/h14) comprises a larger development (33 no. dwellings) but does not appear to readily deliverable – a timescale of between 6 to 15 years is stated. Furthermore, all 33 dwellings attributed to PrC3/h14 are to be affordable in nature. Therefore, there is very little residential land in Drefach which is capable of being delivered in the short term and which can provide a range of housing types to afford much needed choice. The objection site is highly deliverable and can make an important contribution to future housing supply.

- 2.2.8 The limited potential for appropriate residential development within Drefach is of concern and any shortfall needs to be addressed. The net result of this lack of residential development sites, coupled with the Local Authority’s intention to direct employment growth to nearby Cross Hands, means that the sustainability credentials of such an approach are lacking.
- 2.2.9 The designation of the objection site as a residential allocation in the forthcoming replacement LDP will assist in addressing this imbalance and will provide a much needed range and choice in terms of residential accommodation within Drefach.

3.0 NATIONAL PLANNING POLICY CONSIDERATIONS

- 3.0.1 In the preparation of a development plan, consideration must be given to national planning policy and guidance. At present, this takes the form of *Planning Policy Wales* (PPW) and a series of *Technical Advice Notes* (TANs) that deal with a range of topic areas.
- 3.0.2 With regards to residential development, the overarching requirement and principal guidance set by national policy is to provide sufficient quality housing to meet the anticipated needs of the community, including affordable dwellings. It is expected that sites should be free from planning, physical and ownership constraints, whilst also being economically feasible for development, in order to create sustainable communities. Sufficient sites need to be available for the appropriate development of a full range of dwelling types.
- 3.0.3 This formal Carmarthenshire Local Development Plan review should be aiming to assist in addressing Carmarthenshire County Council’s anticipated housing need which hitherto fell significantly below the previously required 5 year supply level. Securing correct levels of sustainable housing growth can only be achieved if truly deliverable allocations are identified. Such allocations should replace many of the failing and undeliverable sites that currently form part of the Authority’s housing and growth strategy for the county.
- 3.0.4 Dealing specifically with the objection site, it is evident that its inclusion within the replacement LDP would adhere to PPW’s requirements to ensure that housing sites are free from any planning, physical or ownership constraints. In addition, the objection site will also be economically viable in deliverability terms.
- 3.0.5 National planning policy provides authorities with more specific guidance in selecting sites for allocation for residential development and in terms of the objection site, it is considered that all relevant criteria are satisfied, including:-
- its sustainable location in terms of proximity to a range of community facilities, local services, public transport services and employment opportunities
 - the physical and social infrastructure of the settlement is capable of accommodating development at the site without detriment to any interest
 - it is not subject to any physical constraint that would prevent its delivery
 - its development for residential purposes would be compatible with existing adjoining land uses.
- 3.0.6 PPW promotes the notion of sustainable development as being central to all planning decisions in Wales. Sustainable development is defined as development that meets

the needs of the present without compromising the ability of future generations to meet their own needs.

- 3.0.7 Similarly, in terms of providing a framework for the provision of housing, a key policy objective is to provide greater choice in the type of housing available. This fundamental ambition manifests itself through the regulatory role of the planning system, which aims to ensure that new homes are provided in the right place and at the right time.
- 3.0.8 It has long been established that new housing developments are expected to be well-integrated with, and connected to, the existing pattern of settlements and should avoid creating a fragmented development pattern. Importantly there is also a recognition that new housing will continue to be required in order to sustain healthy economic activity and the viability of communities. Drefach can accommodate a modest level of development without damage to its character or to the surrounding countryside. New housing would help to sustain this settlement by providing additional critical mass for maintaining local services and facilities.
- 3.0.9 Essentially, directing new development and investment to those locations that already have a range of facilities and services, has the effect of minimising the distances between trip origin and destination, thus reducing the propensity for additional private car travel. The objection site is such a location, being situated in proximity to the village centre, close to a public transport corridor and within a convenient distance of a range of services and facilities.
- 3.0.10 The inclusion of the objection site within revised development limits for Drefach would reflect both national planning guidance, in terms of focusing development in sustainable locations, as well as the sustainable development policies promoted in the 2nd Deposit LDP strategic settlement framework. The objection site would help secure the development plan's strategic residential land supply and its inclusion would not create any amenity, highway or utility service provision issues.
- 3.0.11 In summary therefore, the allocation of the objection site would adhere to and support the objectives, principles and requirements of national planning policy.

4.0 THE PROPOSAL

4.0.1 In order to demonstrate the suitability of the objection site for residential development, this submission is accompanied by an indicative site layout for a potential residential scheme. It should be emphasised that the accompanying site layout is for illustrative purposes and that other alternative design solutions for the site could also be readily devised. Notwithstanding this, the suggested site layout has taken account of all potential site assets, as well as anticipated constraints. The following information therefore expands upon the principles depicted in the submitted layout plan.

4.1 DEVELOPMENT OVERVIEW

4.1.1 It is proposed that the objection site be allocated for residential development in the forthcoming replacement Carmarthenshire Local Development Plan. The accompanying illustrative site layout (reproduced at *Figure 9*) demonstrates that the site is capable of accommodating a modest number of dwellings in a deliverable, efficient and sustainable manner. The illustrative layout indicates an attractive in-depth form of development that fully reflects the existing built form.



Fig. 9 – Development option for objection site

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- 4.1.2 The objection site is clearly capable of accommodating the proposed scheme which reflects the existing form and density of residential development in the locality. It goes without saying that the objection site can readily accommodate a number of variations on the suggested layout.
- 4.1.3 The residential element of the scheme would comprise a high quality phased development and would draw on local Welsh vernacular architectural design elements, making every effort to be sustainable, both through the employment of local contractors, the use of local suppliers, and in the long term, through the provision of residential units within convenient walking distance of village services and facilities. The scheme's quality design will result in a significant gain for Drefach, not least in terms of well-being and placemaking.
- 4.1.4 With regards to access, it is proposed that the development be served by its own individual means of access direct from Heol Blaenhirwaun, with appropriate footway and turning head provision. Visibility splays can readily be achieved by virtue of the straight alignment of the highway.
- 4.1.5 Any existing trees and boundary treatments would be retained and managed as part of an overall landscaping strategy. This commitment would extend to all specified perimeter hedgerows, together with all mature trees.
- 4.1.6 The proposal acknowledges that an element of the proposed dwellings could be affordable in nature, or that contributions could be made to support affordable housing elsewhere in Drefach or indeed Carmarthenshire.
- 4.1.7 The illustrative layout clearly demonstrates that an appropriate residential scheme can be readily devised for the site without any environmental impact or causing harm to any third party interests.
- 4.1.8 It is considered that the objection site is more sustainable and deliverable than those other sites that have been allocated for residential development within Drefach. The inclusion of this land within revised development limits would be fully supported.

4.2 INFRASTRUCTURE CONSIDERATIONS

- 4.2.1 The objection site's proposed development for residential purposes would be served by mains water, gas, public sewer and electricity connections, which are located within the adjoining highway.

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- 4.2.2 As regards any potential surface water, there is sufficient land available to introduce a comprehensive SuDS system as per the suggested layout. The SUDS drainage scheme will be designed in accordance with all Welsh Government advice.
- 4.2.3 There are no areas of marshy grassland or water-logging evident, and therefore at first inspection, it appears that the site benefits from efficient ground percolation of rainwater.
- 4.2.4 Soakaways would provide the most sustainable means of surface water disposal. If required, attenuation measures could be introduced on site to control surface water run-off during extreme storm events, which could also allow for additional capacity, making allowances for climate change. Such features can be hard or soft engineered in the form of small subterranean storage tanks or surface storage ponds.
- 4.2.5 Foul water can be accommodated in the existing mains drainage system serving the remainder of the settlement.
- 4.2.6 The illustrative site layout confirms that the objection site can be developed in an efficient and effective manner, with all highway, amenity and utility service provisions satisfied. The layout is in-keeping with the character of the surrounding area and will provide a defined residential development opportunity to meet the expected needs of the community.

5.0 ENVIRONMENTAL CONSIDERATIONS

5.1 ECOLOGICAL ATTRIBUTES

- 5.1.1 The objection site has been assessed against a catalogue of available environmental data. DataMapWales details statutory and non-statutory national and local sites of ecological importance. The objection site does not contain any national or local nature conservation designation. There are also no areas of established woodland in the locality.
- 5.1.2 Any biodiversity assets that may be present at or adjoining the objection site have been given full consideration with regards to exploring its potential for residential development, including the proposed retention and management of existing boundary trees, woodland and hedgerow features, for further biodiversity gain.
- 5.1.3 The objection site is largely actively used and managed for the purposes of agriculture and therefore is subject to normal nutrient management practices.
- 5.1.4 It is considered that the development of the objection site will not be impeded by any statutory and non-statutory environmental designations.

5.2 HISTORIC ASSETS

- 5.2.1 The objection site has been assessed for any proximity to known and designated historic assets, using DataMapWales.
- 5.2.2 The objection site itself does not contain any listed buildings.
- 5.2.3 There are no scheduled ancient monuments (SAM) within or adjoining the site.
- 5.2.4 The objection site is not situated within or adjacent to any conservation area.
- 5.2.5 As a result, it is considered that the objection site's development would not have any detrimental impact on the setting or interest of any nearby historic asset.

5.3 ENVIRONMENTAL CONSTRAINTS

Potential for Risk from Flooding

5.3.1 The objection site has been assessed against DataMapWales and the Development Advice Maps (DAM), prepared by Natural Resources Wales (NRW).



Fig. 10 – NRW DAM extract in relation to objection site

5.3.2 The above extract shows that no part of the objection site is situated within any designated flood zone, and thus the potential development of the site is not compromised by either fluvial or tidal flooding.



Fig. 11 – DataMapWales surface water flooding extract in relation to objection site

5.3.3 An examination has also been made of DataMapWales and NRW records relating to potential surface water flooding (*Figure 11*). The small areas indicated along the southern and eastern perimeters of the objection site as being potentially susceptible to surface water flooding are unlikely to cause any issues that cannot be readily addressed.

Potential for Ground Contamination and Coal Mining Activity

5.3.4 Significant areas of Carmarthenshire have historically been the subject of coal mining activity. The Coal Authority records have been examined to ascertain the presence of mine entries, adits or seams of shallow coal and mine workings.

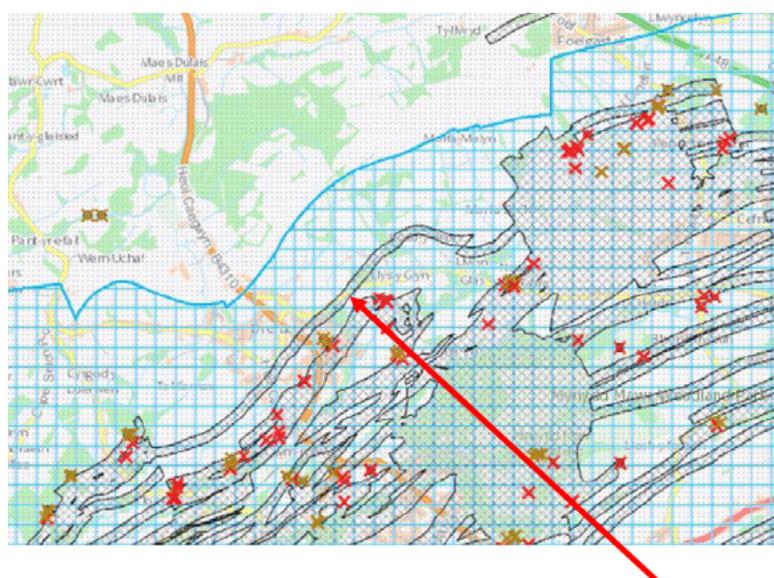


Fig. 12 – Coal Authority extract in relation to objection site

5.3.5 The Coal Authority's records reveal that a small part of the objection site lies within a 'Development High Risk Area'. The whole site lies within a 'Surface Coal Resource Area' and the South Wales Coalfield 'Coal Mining Reporting Area'.

5.3.6 The objection site has no known ground stability related constraints to its proposed development.

5.3.7 The objection site has no known ground contamination related constraints.

6.0 VIABILITY

- 6.0.1 As part of the preparation of any development plan, it is vital to ensure that allocations are both viable and deliverable, in order to ensure that the development plan is sound and meets its own targets or objectives.
- 6.0.2 Detailed viability appraisals are presently difficult to prepare, given the various development permutations available, the absence of full engineering details and costings, and the difficulties of trying to undertake such appraisals at a strategic or in-principle level. It is anticipated that given average house prices in the Drefach area, there will be no difficulty in achieving a positive gross development value for this site. It should be noted that more detailed analysis can be provided at the appropriate stage in the LDP process.

6.1 VIABILITY APPRAISAL

- 6.1.1 The viability of delivering a residential scheme on the objection site is based very much on its greenfield status and adopts values and costings previously accepted by the Local Authority, including:-

Costs

- Dwelling construction costs are based on an absolute minimum of £1,500 per metre.
- Adoptable road construction costs are based on standard costings.
- Connections for all utilities, including water, foul water and electricity.
- Developer's profit is based on minimum RICS guidelines (15%).
- Professional fees, include planning application fee, associated professional fees, estate agency fees (1%) and LABC Warranty fee.

Sales Values

- Sale prices are based on the Local Planning Authority's 'Affordable Housing' Supplementary Planning Guidance, market research and Welsh Government 'Acceptable Cost Guidance' figures, where relevant.
- 6.1.2 It is considered that in principle, the development of the objection site would be financially viable and also capable of making a financial contribution towards the provision of affordable housing within the locality.

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- 6.1.3 The residual land value is likely to be considered reasonable, bearing in mind this will exclude any developer's build profit.

6.2 DELIVERABILITY

- 6.2.1 In terms of deliverability, it should be noted that the objection site is financially and physically viable, with no environmental, geo-physical or technical constraints prohibiting immediate development. Furthermore, there are no ownership or third-party interests preventing the site's delivery.
- 6.2.2 With a developer secured, the development target is established to be within five years from adoption of the replacement Local Development Plan.

6.3 APPRAISAL

- 6.3.1 The justification for the inclusion of the objection site within the development limits for Drefach is derived from national planning policy, as well as the physical attributes of the site itself. The development of the objection site would satisfy sustainability objectives and provide considerable socio-economic advantages for the settlement, not least in terms of providing a guaranteed housing development for the benefit of the local community.
- 6.3.2 The objection site is located within the settlement of Drefach, which is defined as being part of the Cross Hands Tier 1 Principal Centre in the 2nd Deposit LDP and is therefore regarded as a highly sustainable settlement. The broad principle of residential development is acceptable, given its relationship and proximity to the existing built form.
- 6.3.3 The general area is an attractive location for private individuals and small-volume builders due to the proximity of local services and the availability of development land at reasonable cost.
- 6.3.4 Elsewhere, opportunities for new housing land within Drefach are limited with the majority of other allocations being of limited size. The objection site is within defensible boundaries, well-related to existing development and within convenient walking distance of nearby services and facilities.
- 6.3.5 The objection site scheme reflects the built form of Drefach and is strategically situated to take full advantage of wider public transport routes. There are no other suitable areas

of land in such proximity to the primary school for example, that offer the opportunity to facilitate a high quality residential development.

6.3.6 By way of summary, the objection site at Heol Blaenhirwaun, is entirely suitable for residential development for the following reasons:-

Compatibility with adjacent land uses

A significant proportion of surrounding land is residential – the layout of the objection site will be designed so as to avoid any incompatibility issues.

Potential community benefits including affordable housing

The element of affordable housing will be beneficial in terms of providing much needed elderly persons accommodation at a subsidised rent.

Site availability and deliverability during the Local Development Plan period

There are no constraints preventing the development being completed. The objection site is readily available.

Infrastructure capacity (water supply, foul and surface water capacity)

There is adequate infrastructure capacity within the settlement to accommodate the development of the objection site.

Accessibility to public transport

The objection site is located in close proximity to a main public transport corridor.

Flood risk (Zones A, B, C1 & C2)

There are no flood risk issues.

Impact upon biodiversity, protected sites and species

A site inspection will confirm that the majority of the objection site comprises low quality agricultural land that has been extensively grazed. No significant bio-diversity interest could be established and no protected species will be affected by its development.

Landscape impact

There will be no landscape impact from the objection site's development.

Contaminated land

There are no known land contamination issues.

Impact upon listed buildings, registered historic parks or landscape parks

There are no listed buildings within or in close proximity to the objection site.

Impact upon scheduled monuments

There are no scheduled monuments within or in close proximity to the objection site.

Impact upon conservation areas

The objection site does not form part of any conservation area.

Impact upon other environmental designations

The site does not form part of any other environmental designation.

6.3.7 In addition, the retention of any important trees and hedgerows will minimise any potential visual impact.

6.3.8 The required proportion of affordable housing will be beneficial in terms of providing much needed accommodation within the settlement.

6.3.9 By way of emphasis, the objection site:-

- will help sustain the community by providing dwellings in a location that reinforces the settlement pattern;
- is of moderate size and is well-related to existing residential development;
- would not be tantamount to development in the open countryside, as it adjoins an area of land with planning permission for residential development;
- would not result in the loss of any important amenity feature or represent an unacceptable intrusion into the landscape;
- would fully comply with established planning policies that direct development to sustainable locations in terms of proximity to services, facilities, public transport routes and employment opportunities;
- will be contained within existing defensible boundaries and will not give rise to any harmful precedent for further residential development;
- represents an efficient and sustainable development opportunity;
- the site's favourable physical relationship with existing residential development will enable development to be undertaken without the potential problems of overlooking, etc.;
- would not give rise to any recognised highway or utility service provision objections; but instead,
- would contribute to the local community's well-being by providing homes at a sustainable location within the context of Drefach.

7.0 CONCLUSION

- 7.0.1 This submission has been prepared in order to demonstrate that the development of an area of land at Heol Blaenhirwaun, Drefach, Cross Hands, has the potential to contribute to the strategic aims and objectives of the replacement Carmarthenshire Local Development Plan (2018 – 2033).
- 7.0.2 The inclusion of the objection site within the development limits for Drefach would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type.
- 7.0.3 The development of the objection site would be in keeping and in character with existing and proposed development and would help reinforce the built form of the settlement.
- 7.0.4 The objection site represents a sustainable and deliverable opportunity to provide new housing within this designated Tier 1 Principal Centre. With the site capable of being readily served by utilities, together with an efficient means of access from the adjoining public highway, there are no barriers to its delivery within the early stages of the forthcoming plan.
- 7.0.5 The objection site also lies in close proximity to the services and facilities of the village centre and benefits from regular public transport links with nearby settlements.
- 7.0.6 The development of the objection site will ensure a deliverable source of future housing for this sustainable settlement. It is suggested that the Local Authority closely scrutinises those sites allocated in the 2nd Deposit LDP in terms of their suitability and deliverability. National planning policy advises that, in those instances where deliverability is uncertain, such sites should not form part of the replacement Local Development Plan.
- 7.0.7 The objection site is located immediately adjacent to residential land and its development:-
- would be acceptable to both the form and character of the locality;
 - would not be detrimental to the amenity of adjacent properties;
 - would satisfy recognised housing and sustainability objectives;
 - would not have a detrimental impact on the landscape or nature conservation interests.

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- 7.0.8 The objection site has limited amenity value and is a sustainable location. Its development would satisfy all other development considerations, such as access, parking, availability of utility services, landscaping, etc.
- 7.0.9 With the objection site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its short term delivery is assured. The site represents a sustainable opportunity for future residential development.
- 7.0.10 For the reasons set out above, it is respectfully requested that favourable consideration is given to the inclusion of the objection site within the LDP's development limits for Drefach, thereby allowing the site to come forward during the plan period up to 2033.