

Representations to the Carmarthenshire Second Deposit Revised LDP.

Land south of Penygroes Road, Gorslas, Llanelli.

On behalf of The Co-operative Group.

Date: April 2023 | Pegasus Ref: P19-1937/R002



Document Management.

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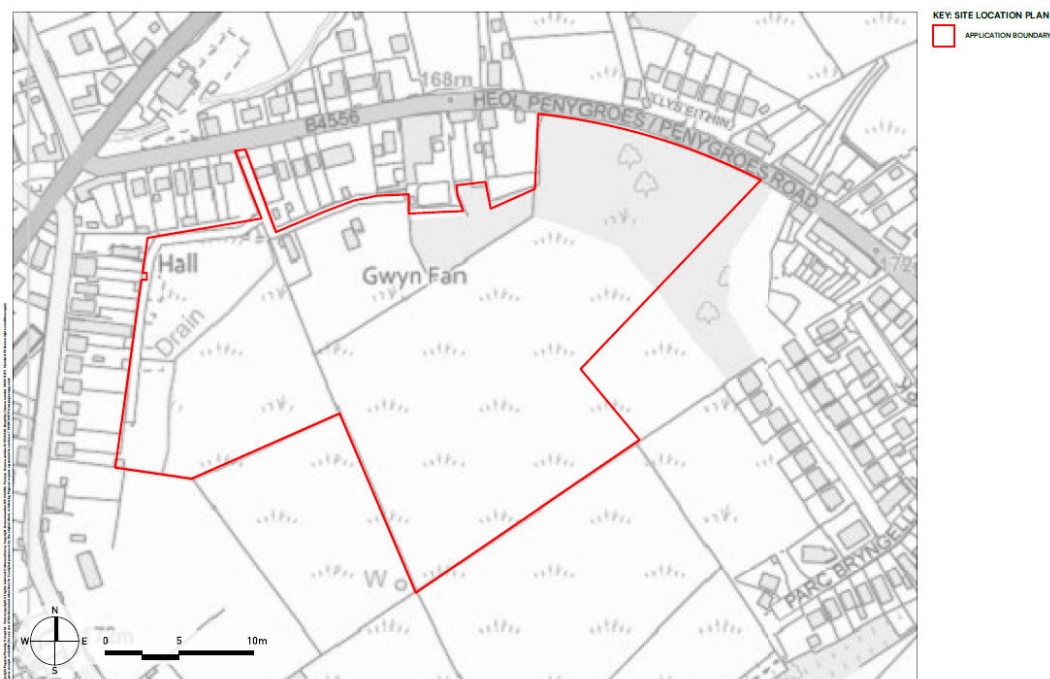
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1. Introduction

- 1.1. Pegasus Group is instructed by the Co-operative Group (the 'Co-op') to submit representations to the Carmarthenshire Second Deposit Revised LDP consultation.
- 1.2. The Co-op own a Site referred to as 'Land south of Penygroes Road, Gorslas' (the 'Site') and are promoting the Site for residential development. A copy of the Site Location Plan is enclosed with a copy of these representations (**Appendix 1**) and the extent of the land is shown below:



- 1.3. The Site comprises an area of c. 6.5ha and is considered to be capable of accommodating approximately 120 dwellings.¹
- 1.4. A call for sites form was submitted to the Council in August 2019 by Pegasus Group on behalf of the Co-op. A copy of this submission is also appended to these representations (**Appendix 2**).
- 1.5. Representations were submitted to the Deposit LDP in March 2020 and these are resubmitted here and amended as necessary. The Site has not been included as a candidate site in the Second Deposit Revised LDP and we consider that it should be included as a residential allocation for the reasons given in these representations.

¹ Assuming 30dph on 60% of the site.



Executive Summary

- 1.6. These representations respond directly to the following policies and paragraph references, as set out in the Second Deposit Revised LDP:
- Preferred Spatial Option (Chapter 8);
 - Paragraph 8.20;
 - A New Strategy (Chapter 9);
 - Policy SP1: Strategic Growth;
 - Policy SP3: Sustainable Distribution – Settlement Framework;
 - Policy SP4 – A sustainable Approach to Providing New Homes; and
 - Policy SD1: Sustainable Distribution – Development Limits.
- 1.7. Our comments on the above policies would support a higher quantum of growth to the Tier 1 settlements in the interests of making the plan more effective in delivering its key aims and more appropriate in terms of delivering sustainable development and mitigating its impact on climate change.
- 1.8. This will, in turn, require the identification of additional sites for housing at these settlements and we consider that the Site should be allocated for residential development as part of this process, based on the updated sustainability appraisal we have undertaken using the Integrated Sustainability Appraisal (ISA) template provided for developers. This demonstrates that the Site is a sustainable, deliverable and logical location for housing.



2. Preferred Spatial Option (Chapter 8)

- 2.1. Paragraph 8.20 sets out the preferred Spatial Option and is unchanged from the Deposit Draft LDP. The Option is stated as being a hybrid of a Balanced Community and Sustainable Growth Strategy. The Spatial Option acknowledges the need to recognise and reflect investment/economic benefits and opportunities, seeks to be community led, and will aim to allocate development in a sustainable way.
- 2.2. Whilst we are broadly supportive of the preferred Spatial Option, we feel that it needs to be more explicit in stating that the strategy needs to align with the ambitious economic aspirations of the plan.
- 2.3. At present, we do not feel that this is reflected in the proposed Spatial Option and, therefore, it has not been fully justified in the context of the Council's economic growth ambitions.
- 2.4. We would stress that this does not require wholesale changes to the proposed Spatial Option as this could still be community led and the delivery of sustainable development should be at the heart of all Plan strategies. However, we would wish to see it reflect the Council's ambitious economic growth aspirations and acknowledge that this will influence the spatial distribution of development.

3. A New Strategy (Chapter 9)

- 3.1. We are broadly supportive of the Plan's ambitions to deliver economic growth and an uplifted housing requirement to support this. However, the perceived reduced importance of delivering the Council's ambitious economic growth targets within the Preferred Spatial Option has manifested in what we consider to be an ineffective Plan Strategy.
- 3.2. This is because the Second Deposit Revised LDP seeks to take a balanced approach to the distribution of housing supply (paragraph 9.4), despite the fact that it will be reliant on only a few key centres to deliver the vast majority of the economic growth it aspires to (namely, Llanelli, Ammanford/Cross Hands and Carmarthen).
- 3.3. We accept that growth will need to come forward at all levels of the settlement hierarchy (including rural areas) to support the vitality and viability of the diverse communities across the county. However, the Plan's focus on delivering economic growth and a balanced approach to the distribution of development are unlikely to be an effective combination in meeting the plan's aspirations.
- 3.4. The plan acknowledges that the Tier 1 settlements are the strongest economic drivers from a market demand and delivery perspective and states that they will receive an "appropriate proportion" of the anticipated growth. However, this should be quantified within the plan (which it is not at present) alongside the level of housing and other types of development needed to be delivered in conjunction with it.
- 3.5. The Plan Strategy needs to be more realistic in acknowledging that it cannot rely on lower order settlements and rural areas to deliver the economic growth it aspires to and that the Tier 1 settlements will likely need to play a greater role than is currently identified.
- 3.6. It also needs to acknowledge that employment sites will only come forward where they have access to good services, facilities and infrastructure. Furthermore, they will also need to be accessible for the local/regional labour market.
- 3.7. It is, therefore, essential that the Plan identifies the supporting development and infrastructure that needs to be delivered alongside employment sites in order to stimulate investment and economic growth. The plan currently fails to do this, and this has resulted in deficient policies which are discussed further below.



4. Policy SP1: Strategic Growth and Policy SP4: A Sustainable Approach to Providing New Homes

- 4.1. As stated above, we support the Council's decision to deliver a higher quantum of dwellings over the plan period to align with the Council's economic growth ambitions. We support the proposed 10% flexibility applied to the housing requirement as this will provide a reasonable (albeit not optimal) level of flexibility to improve the prospects of meeting the minimum housing requirement.
- 4.2. However, we question why this has been reduced from the 15% flexibility applied in the First Deposit Revised LDP. This is particularly important in the context where one of the reserve sites under Policy SG2 has been removed.
- 4.3. In addition, we are not convinced the distribution of housing has been properly justified in the context of the ambition to deliver higher levels of economic growth. Our principal concern is that the ambitions to deliver economic growth will be jeopardised by the balanced approach to distributing growth across the county.
- 4.4. This has, in turn, resulted in a distribution pattern that does not appear to appreciate the importance of the spatial relationship between employment growth and housing delivery as they support the delivery of one another.
- 4.5. In simple terms, the distribution strategy does not take a realistic view of the capacity of lower order settlements to deliver economic growth, relative to the Tier 1 settlements and has, accordingly, failed to allocate a sufficient level of housing in close proximity to key employment areas.
- 4.6. It is important for housing to be delivered in close proximity to key employment areas for a number of reasons. Two particularly pertinent reasons are as follows:
 1. It encourages commuting via alternative modes of transport to the private motor vehicle in the interests of sustainability and mitigating impacts on climate change;
 2. Housing delivery creates a critical mass and local workforce which stimulates investment and job creation.
- 4.7. Policies SP1 and SP4 (including their supporting text) need to clearly justify the overall quantum of development to be delivered at each settlement tier and then explain how it will be distributed to support the economic aspirations of the plan, alongside its sustainability and community aspirations. Its failure to do so at present is a significant deficiency with the plan that needs to be addressed.



5. Strategic Policy SP3: Sustainable Distribution – Settlement Framework

- 5.1. Policy SP3 sets out the settlement hierarchy and settlement clusters. We largely agree with the structure and support the Ammanford/Cross Hands area being included within the first tier – Principal Settlements.
- 5.2. We also agree with the assertion that growth and development will be directed to sustainable locations in accordance with the spatial framework; however, as mentioned above, we have some reservations with how this has been implemented.
- 5.3. Whilst we note that the highest proportion of development is due to be delivered at the Tier 1 settlements (a principle we support), we consider that too great a proportion of growth has been allocated to lower order settlements. As stated above, the Plan is unrealistic in the way it proposes to distribute growth to deliver its economic aspirations and the allocation of housing sites to support this is also unsuitable as a result.
- 5.4. If the Plan is serious about delivering economic growth, sustainable development and mitigating its impacts on the environment to combat climate change, then it needs to re-think its distribution framework and allocate higher levels of development to the Tier 1 settlements.

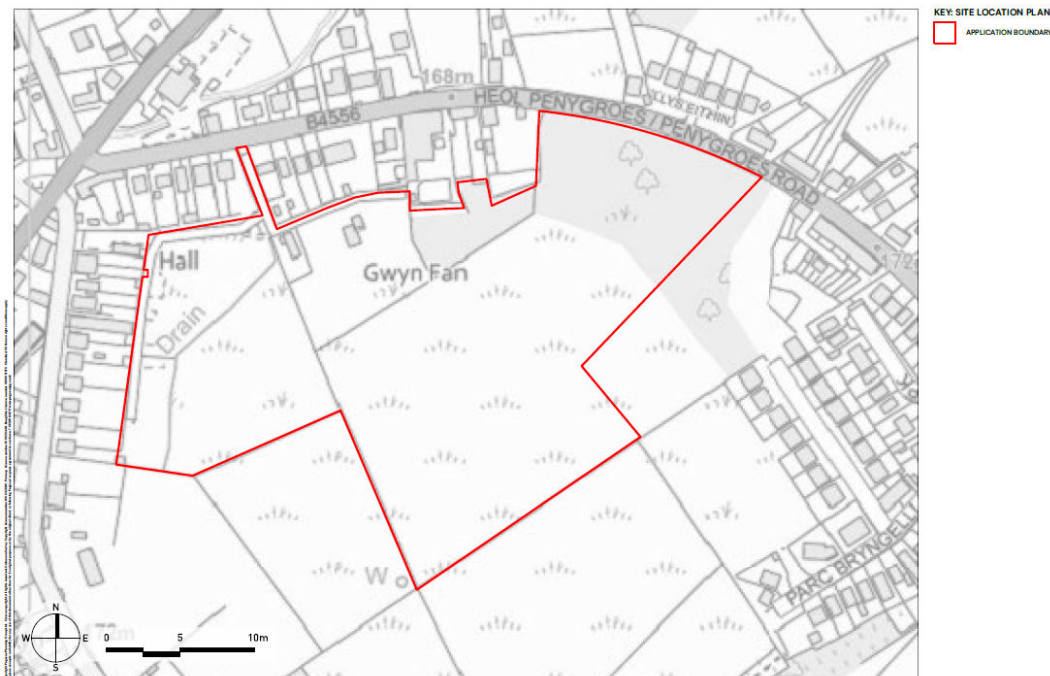


6. Policy SD1: Development Limits

- 6.1. This policy states that development *within* the identified development of Tier 1-3 settlements will be acceptable, provided that they accord with other relevant policies of the LDP.
- 6.2. Whilst there are exceptions to this rule (for example, Policy HOM6), the policy does not set out a scenario whereby development for traditional housing can come forward beyond the development limits. This will be problematic in circumstances where the Council's housing delivery fails to keep pace with their proposed annual requirement.
- 6.3. Whilst we support the principle of identifying specific sites to meet the development needs of the district within the LDP to guard against excessive unplanned development, Local Plans still need to be sufficiently flexible to ensure that housing and other types of development can come forward to meet the needs of the population. This is especially important in situations when delivery does not match up with the plan's target levels of growth. This could be due to any number of reasons, from deficiencies with the plan, unforeseen technical issues affecting the delivery of certain sites or broader macro-economic factors.
- 6.4. We note the identification of Reserve Sites (Policy SG2) and acknowledge that this will go some way to securing supply in the event allocated sites cannot come forward albeit one of the reserve sites has been removed from the Second Deposit Revised LDP over the Revised Deposit version. However, we would question whether this is a sufficiently flexible approach that will help to guarantee the delivery of the plan's housing requirement. We note that the delivery of a reserve site will need to be subject to a masterplanning exercise. This requirement is something that would potentially delay its delivery and prevent it from addressing a specific need (e.g. housing shortfall) in a timely manner.
- 6.5. As such, we consider that this policy should incorporate wording to allow for development in sustainable locations that would otherwise comply with the relevant policies of the LDP in the event that the supply and delivery of housing failed to keep pace with the Local Plan Housing Requirement (i.e. the absence of a five-year supply of housing land).
- 6.6. We would suggest additional wording to the policy to make it clear to prospective applicants when it would be acceptable to propose development on unallocated sites. This would provide certainty and allow for windfall sites to come forward in accordance with the LDP to meet shortfalls when they arise.
- 6.7. We acknowledge that the plan has attempted to plan positively for housing growth in particular and sought to incorporate measures to secure this (10% buffer to the housing requirement (albeit reduced from 15%) and the identification of reserve sites) over the plan period. However, we consider that policy SD1 should incorporate additional flexibility to allow development to come forward under certain circumstances (as specified above) in order the ensure the plan can remain as effective as possible for its duration.

7. Land to the south of Penygroes Road, Gorslas, Llanelli

- 7.1. As stated in the Introduction, the Co-op controls an area of land to the south of Penygroes Road, Gorslas comprising a number of fields which cover an area of around 6.5ha and would be capable of delivering c. 120 dwellings.



- 7.2. Vehicular access could be taken from the B4556 to the east with an emergency/pedestrian access being taken from the north via an existing driveway/access.
- 7.3. The Site is well related to development around the 6-way junction along the A476 which is home to a number of services and facilities that would meet the day to day needs of future residents.
- 7.4. The Site is also well related to existing and future large-scale employment and commercial development areas at Cross Hands.
- 7.5. The Site's proximity to these services, facilities and employment opportunities would reduce the reliance on the private motor vehicle to meet the day to day needs of future residents and would encourage the use of active modes of travel such as walking and cycling.
- 7.6. The Site is free from any land use allocation or other designations that would otherwise constrain development; it could be made available for development in the short-term and be built out comfortably within a five-year time frame once detailed planning permission is granted.

8. Integrated Sustainability Appraisal

8.1. Our representations to the Deposit LDP in March 2020 included an assessment of the sustainability of the Site with regard to the guidance available at that time. Since then, the Council has published an Integrated Sustainability Appraisal (ISA) document for consultation alongside the Second Deposit LDP.

8.2. Paragraph 1.7 of the ISA states that:

“The Council strongly advises that in responding to the Deposit rLDP, any relevant new, site(s) proposed should be accompanied by an integrated Sustainability Appraisal (incorporating Strategic Environmental Assessment). A site not subject to ISA is unlikely to be considered suitable for allocation in the plan.”

8.3. As a result, we have provided an assessment of the sustainability of the Site against this updated criteria in the below table.

8.4. As shown by our responses, the Site performs extremely well against the various elements of the SA with only the fact that the Site is a greenfield site and may contain high carbon soils being the only constraints affecting the Site's development.

Question	Comments
Q1. Is the site compatible against the location of future growth presented in the Deposit LDP?	Yes. The Site is located on land to the south of Penygroes Road and to the southern edge of Gorslas which is included within the Ammanford/Cross Hands Tier 1 settlement. The site is well related to the existing built up area and has access to a number of services, facilities, employment opportunities and transport connections as a result.
Q2 Can the Site accommodate 5 or more dwellings	Yes, the Site could deliver c. 120 dwellings
Q3 Is the Site within, or directly related to an identified settlement in Tiers 1 - 3 of the LDP Preferred Strategy?	Yes, the Site is directly related to a Tier 1 settlement

<p>Q4. Is the site located within a flood risk zone?</p>	<p>The entirety of the Site lies within Zone A, the area considered to be at little or no risk of flooding.</p>
<p>Q5. Is the site located within or immediately adjacent to any sites designated for importance to nature conservation?</p>	<p>No. The Site is not affected by any nature conservation sites.</p>
<p>Q6. Is the site located within or immediately adjacent to any Scheduled Monuments?</p>	<p>No. The Site is not affected by any Scheduled Monuments.</p>
<p>Q7. Would development of the Site be in contrary to general planning principles?</p>	<p>No. The development of the Site would lead to a sustainable urban extension to Gorslas and would not result in coalescence of settlements or in the loss of public open space.</p>
<p>Q8. Would the development of the site have a detrimental impact on the character and setting of the</p>	<p>No. Whilst this would need to be subject to further technical work, the Site is not considered to make a significant contribution to the character of the settlement. The Site is well contained by development to the north, east and west. Furthermore, the delivery of new road infrastructure to the south will serve to reduce any already limited contribution the Site made to the settlement's setting.</p>






settlement or its features?	
Q9. Will the proposal involve the re-use of suitable previously developed land and/or buildings?	No. The Site is a greenfield site.
Q12 Have any significant and evidenced highway issues been identified relating to the site?	No. Whilst further technical work will need to be undertaken, it is considered unlikely that the Site's development will have a significant adverse impact on the local highway network, given the scale of the development proposed and the delivery of new road infrastructure to the south of the Site.
Q13 Does the site have suitable access to public transport and/or active travel route?	Yes. There are a number of bus stops in the vicinity of the Site connecting it Llanelli, Cross Hands, Ammanford and other locations in the surrounding area.
Q14 Does the site have access to green space/ leisure/ recreational facilities that are within a reasonable distance?	Yes. Gorslas Parc is in close proximity. The Site would also have scope to deliver open space and green infrastructure as part of its development to the benefit of existing and future residents.
Q15 Is the site within reasonable distance to: (a) Employment provision (b) Retail	Yes. The Site is well related to services and facilities located along the A476 within Gorslas. This includes access to a primary school, convenience store public house (among other things).

<p>provision (c) Other services and facilities</p>	<p>The Site is also a short distance from Cross Hands and its range of large and smaller retail outlets, including an Aldi, pharmacy and B&M Home Store/Garden Centre.</p> <p>The Site is also within walking/cycling distance of the Cross Hands Business/Retail Park and the range of retail/leisure outlets and employment sites.</p>
<p>Q16 Is the site within a reasonable distance to education facilities?</p>	<p>Yes. The Site is located in close proximity to Gorslas Primary School and there are a number of other early years education institutions in the wider surrounding area.</p> <p>The Site is also in close proximity to "Ysgol Gyfun Maes y Gwendraeth" a secondary school with Sixth Form.</p>
<p>Q17 Is the site located within or adjacent to a mineral buffer zone?</p>	<p>No</p>
<p>Q18 Is the site located within a Mineral Safeguarding Area</p>	<p>A small part of the northern Site lies within a Sand and Gravel Category 2 Aggregate Safeguarding Area. However, the vast majority of the Site is unaffected by mineral buffer zones.</p>
<p>Q19 Is the site within or immediately adjacent to an AQMA?</p>	<p>No.</p>
<p>Q20 Does the site contain high carbon soil e.g. peatlands?</p>	<p>The Mineral Resource Map for Wales indicates that the Site may contain high carbon soil, although this will need to be subject to further investigation.</p>

<p>Q21 Does the site contain high quality agricultural land?</p>	<p>No. The Site is comprised of Class 5 and Class U agricultural land.</p>
<p>Q22 Is the site located within or immediately adjacent to any Regionally Important Geological and Geomorphological Sites?</p>	<p>No.</p>
<p>Q24 Does the site have an available water connection?</p>	<p>Unknown – but given the proximity to the settlement of Gorslas, one should be deliverable.</p>
<p>Q25 Is the Site within or adjacent to a phosphate sensitive SAC catchment?</p>	<p>No.</p>
<p>Q26 Does the Site have connections to other infrastructure requirements?</p>	<p>Unknown – but given the proximity to the settlement of Gorslas, these should be deliverable.</p>
<p>Q27 Does the location and/or scale of the site have the potential to have a detrimental impact on Welsh Language?</p>	<p>No. The delivery of the Site is not considered to have the potential to adversely affect the Welsh language.</p>



8.5. As can be seen, we have colour coded our response to provide an indication of the Site's positive and negative attributes. The colour code used is shown below:

Clearly positive	
Likely positive	
Neutral	
Likely negative	
Clearly negative	

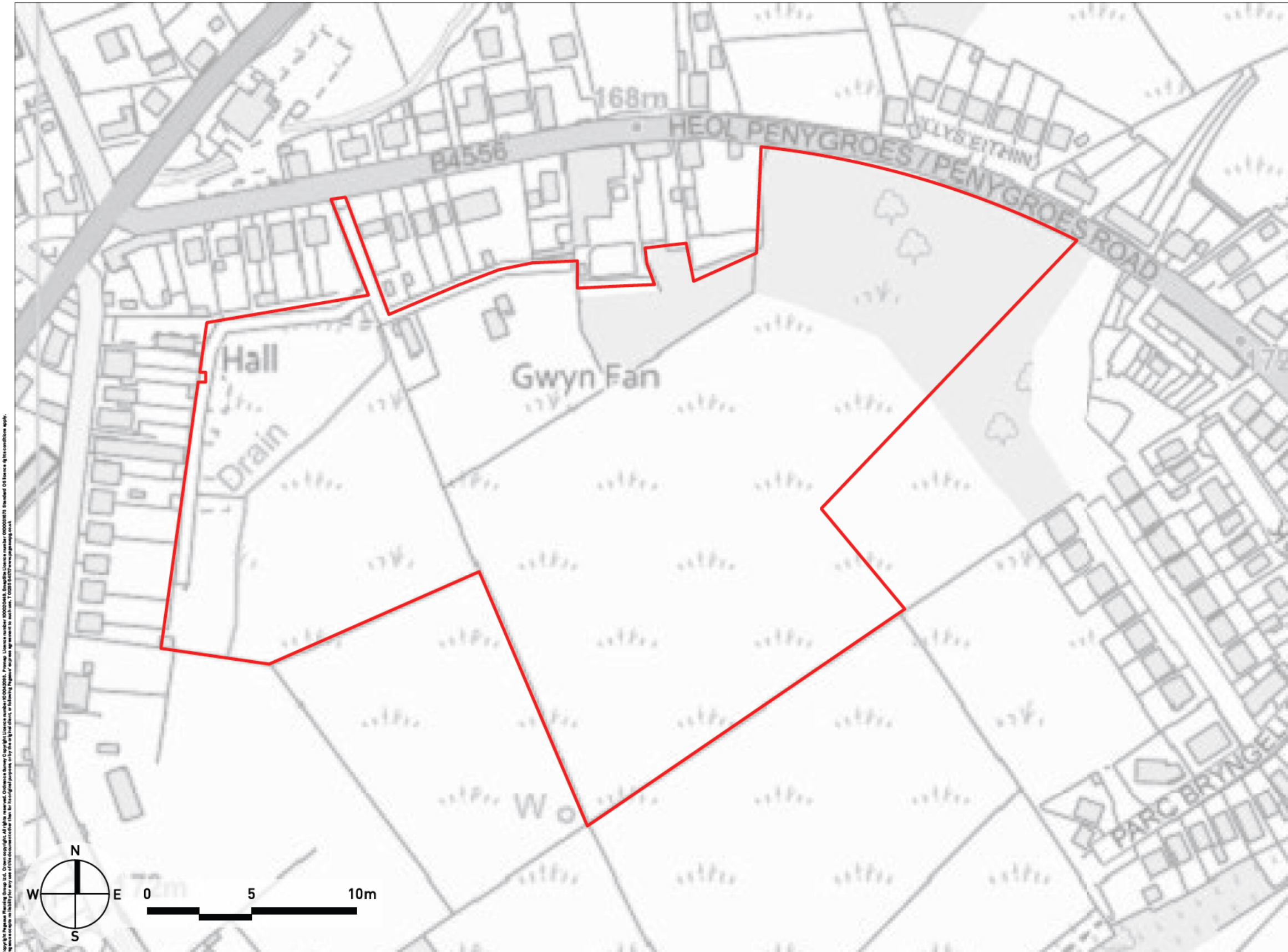


9. Summary Representations

- 9.1. These representations have been submitted on behalf of the Co-op in respect of its land to the south of Penygroes Road, Gorslas. The Co-op is promoting the Site for residential development and consider it to be a sustainably located, deliverable and logical site for the proposed use. The Co-op has a good track record of promoting sites for development and working with developers and house builders to ensure that sites are sold on and deliverable. It does not sit on sites or 'land bank.'
- 9.2. Whilst we are broadly supportive of the economic aspirations of the LDP and agree with the uplift to the housing requirement accordingly, we have reservations with the proposed strategy to deliver this ambitions targets.
- 9.3. This is namely down to the following reasons:
- The Preferred Spatial Option and Plan Strategy appear to have diminished the importance of delivering these said economic aspirations;
 - They are unrealistic in their view that lower order settlements will be able to deliver the currently proposed economic growth and role Tier 1 settlements will need to play has been underestimated;
 - There is a disconnect with the spatial distribution of employment development and residential development and it is not clear how they will support the delivery of one another; and
 - The proposed flexibility measures notwithstanding, we consider that the plan should include a policy to facilitate development beyond the defined settlement limits in the case of severe plan failure.
- 9.4. We suspect that when the plan is reviewed in light of these issues, a higher proportion of growth will be identified at the Tier 1 settlements and this will require additional housing allocations to be included.
- 9.5. Our client's Site is available, deliverable and sustainably located. We have assessed it against the Council's ISA template and it has performed very well with few minor issues. We would, therefore, support a new policy allocating the Site for residential development in the final version of the LDP.



Appendix 1: Site Location Plan



KEY: SITE LOCATION PLAN
 [Red outline] APPLICATION BOUNDARY

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LAND SOUTH OF PENYGROES ROAD, GORSLAS, LLANELLI - SITE LOCATION PLAN

www.pegasusgroup.co.uk | DRAWN BY: RWM | APPROVED BY: CM | DATE: 11/04/2024 | SCALE: 1:200@A3 | DRWG: P19-1937_01B | CLIENT: THE CO-OPERATIVE GROUP





Appendix 2: Call for Sites Submission (August 2019)

Revised 2018-2033

Carmarthenshire Local Development Plan

Please use this form to provide details of the **Candidate Site** you are proposing for inclusion or protection within the revised Carmarthenshire Local Development Plan. By providing as much information as possible it will help the Authority process and assess your Candidate Site efficiently. Reference should be given to the content of the guidance note in completing this form.

The submission period commences on Monday, February 5th 2018 and representations must be received by the deadline of 2.00pm on Wednesday 29th August 2018. Submissions received after this deadline will not be considered. It is the Council's preference to receive the submissions electronically, however submissions may be forwarded by post. This questionnaire form is available upon request at the Council's Customer Service Centres, and at the County's Public Libraries. Any continuation sheets or additional documentation should be securely attached and referenced.

If you have any queries relating to the submission form or guidance notes, please contact the Forward Planning Section on forward.planning@carmarthenshire.gov.uk or by telephone on 01267 228818.

Paper submissions should be sent to Forward Planning Section, Environment Department, 5-8 Spilman Street, Carmarthen, Carmarthenshire, SA31 1JY.

Please note that the submission of a site does not imply that it will be accepted and allocated or otherwise for development by the Authority. All candidate site submissions will be available for public inspection in the form of a Candidate Site Register and cannot therefore be treated as confidential.

Office use only

Date Received:

Date Acknowledged:

Site Reference:

Respondent Number:

Agent Number:

Candidate Site Assessment Questionnaire

Name: Chris Edge
Address: c/o Agent

Post Code: c/o Agent
Organisation (where applicable): Co-operative Group
Telephone: c/o Agent
E-mail: c/o Agent

Preferred method of communication: Letter e-mail

Agent's Details (where applicable)

(If you nominate an agent, correspondence will only be sent to your agent).

Name: Jonathan Rainey

Address: Pegasus Group, First Floor, Equinox North, Great Park Road, Almondsbury, Bristol

Post Code: [REDACTED]

Organisation (where applicable): Pegasus Group (Bristol)

Telephone: [REDACTED]

E-mail: [REDACTED]

Preferred method of communication: Letter e-mail

1. Site Location:

See accompanying plan. Land is located on the south-eastern edge of Gorslas, between Black Lion Road and Penygroes/Norton Road.

Please identify the extent of the site on an Ordnance Survey Plan (Red Outline)

2. Site Area, please choose (m2 / acres / hectares):

7.02 hectares

3. Is the site within, immediately adjoining, or closely linked to an identified settlement in the current LDP? Please identify the settlement:

Yes No

Which Settlement? Gorslas

4. What is the current use of the site? Agricultural.

5. What is the proposed use of the site? Residential.

6. Are there any buildings on the site? Yes No

If yes, are the buildings in use or are they vacant? Please provide details:

N/A

Personal Details

Site Details

7. Does the proposer own the site?

Yes

No

8. If the proposer does not own the site, has the landowner been contacted and agreed to any potential development of the site?

N/A

9. Does the proposer own or control any adjoining land? Yes No

If yes, please explain the interest and identify the extent on an Ordnance Survey Plan (Blue Outline).

[Click here to enter text.](#)

10. Is your site an allocation in the current LDP?

Yes No

11. If so, has progress been made to develop the site? Yes No

If yes, please provide details of the progress.

If no, please provide details as to why it is not being developed.

N/A

Site Ownership

Residential Use

12. Are you proposing a residential use on the site? If so, is it for a housing allocation (5+ units) or for small scale development (less than 5 units)?

Small scale development includes amendments to the development limits.

Housing Allocation

Small Scale

Not Applicable

Housing Development

13. If the site is to be considered as a housing allocation (5+ units), please provide supporting information as set out in the guidance note.

The site is agricultural land adjoining the village of Gorslas on the outskirts of Cross Hands. Gorslas has been identified as a 'Growth Area' in the Carmarthenshire Local Development Plan (Policy SP3) and there are a number of large site allocations in the surrounding area that are expected to deliver residential, commercial, community and employment uses. The area is, therefore, a sustainable and logical place for further growth.

The site forms the northern section of a large piece of grass land between Black Lion Road and B4556 / Penygroes Road. The site is broadly flat and open, with the exception of a small number of trees located across the site.

The site adjoins the rear of residential properties to the west fronting Black Lion Road and to the north fronting the B4556 / Penygroes Road. The site is served by an access track between two residential properties fronting Penygroes Road but also benefits from a direct frontage to Penygroes Road further to the east. To the south is agricultural land.

Deliverability of the Site

The amenity of neighbouring properties can be secured by providing suitable separation distances between the existing and proposed dwellings. Residential would be an appropriate use in this location, given the surrounding character is residential in nature.

The site is located in close proximity to a number of services and facilities within Gorslas that are predominantly concentrated around the collection of junctions along Cross Hands Road.

A large number of employment/commercial uses are located less than 1km to the south of the site within the 'Cross Hands' business park. This is due to be extended further east (i.e. closer to the site) under allocation GA3/E7 ('Cross Hands East').

As stated above, additional mixed use allocations have been identified in the Carmarthenshire Local Development Plan to the east and west (GA3/MU1 and GA3/MU2). The site sits within an area identified for substantial levels of growth and regeneration and stands to benefit from the development of additional housing, open space, commercial and employment uses in the surrounding area.

14. For small scale developments (sites of less than 5 units), please provide supporting information as set out in the guidance note.

N/A

Deliverability of the Site

Non-residential Land Use

15. For non-residential candidate sites, please identify how the site will be developed for its intended use.

N/A

16. When would you intend to bring the site forward for development?

- Short Term (2021- 2024)
- Medium Term (2024-2029)
- Long Term (2029-2033)

17. What would be the land value of the site if the proposed use was achievable?

*Only to be answered if an allocation is being proposed.

N/A

Viability

18. Is the site accessible from the existing public (adopted) highway?

- Yes No

19. Does the site have a suitable access point with adequate visibility?

- Yes No

If yes, please identify how this is achieved.

If no, how would the access point and visibility be achieved?

The site is bounded Penygroes Road/Norton Road to the north east. Suitable visibility splays would be achieved by keeping areas free from development and the removal of existing hedgerows. There

Accessibility

is also scope to provide a secondary/emergency access from the north via an existing track under the Co-op's ownership.

20. Is the site located within a flood risk zone as identified in the TAN 15 Development Advice Maps?

Zone A Zone B Zone C1 Zone C2

**proposers should note that the Local Planning Authority may request further information or evidence during the candidate site process where consultation responses highlight issues relating to tidal, fluvial, surface water flooding and the impacts of climate change.*

21. Is the site previously developed (brownfield) or is it a greenfield site?

Previously Developed Greenfield

22. Does the site have an available water connection?

Yes No

If no, describe how these facilities will be obtained.

Achieving a suitable water connection would certainly be possible given its proximity to existing infrastructure. The final strategy would be determined by detailed technical drainage work.

23. Does the site have a suitable sewerage connection?

Yes No

If yes, what would be the method of foul sewage disposal?

N/A

If no, describe how these facilities will be obtained.

Achieving a suitable sewerage connection should be possible given its proximity to existing infrastructure. The final strategy would be determined by detailed technical drainage work.

24. Are there any historic or archaeological features or designations affecting the site?

Yes No

If yes, please provide details:

N/A

25. Are there any landscape or ecological features / designations or protected species which may be impacted upon by the development of the site? Please refer to the checklist for developers on Nature Conservation and Biodiversity.

Yes No

If yes, please provide details:

N/A

26. Are there any trees or hedgerows which may be impacted upon by the proposed development?

Yes No

If yes, please provide details:

If an access is to be provided along the north-eastern boundary it will need to remove part of the hedgerow to achieve a suitable access. Replacement planting could be provided elsewhere if appropriate. However, an alternative access could be achieved along the south-west boundary that would have no significant impact on existing green infrastructure.

Environment, Infrastructure and Utilities

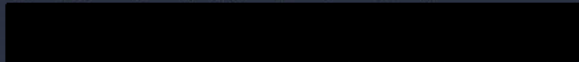
27. If you have any further comments to make in support of the proposed site, please set them out here and/or securely append additional sheets or other evidence:

N/A

Other Considerations

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Bristol



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