

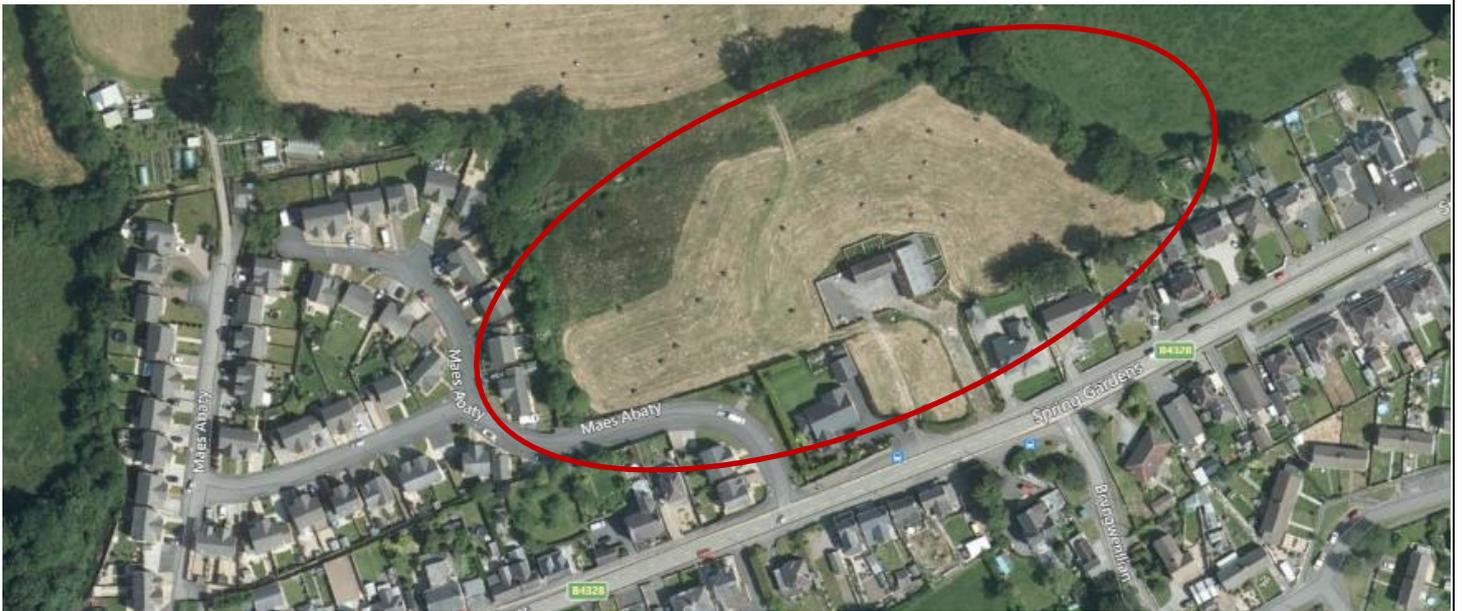


PLANNING STATEMENT AND JUSTIFICATION REPORT

OUTLINE (MAJOR) APPLICATION FOR RESIDENTIAL
DEVELOPMENT (INCLUDING AFFORDABLE ELEMENT)
TOGETHER WITH NEW VEHICULAR ACCESS AND ASSOCIATED
PARKING AND LANDSCAPING (ALL MATTERS RESERVED
EXCEPT HIGHWAYS)

LAND ADJACENT TO THE BEECHES, SPRING GARDENS,
WHITLAND, CARMARTHENSHIRE, SA34 0HP

3rd March 2021



*Above - Aerial photograph of the proposed application site (source: Bing Maps)
Below – Illustrative Layout A-A in Context from Drawing P03*



Application for Planning Permission Town and Country Planning Act 1990

Head of Planning
Carmarthenshire County Council
6-8 Spilman Street
Carmarthen
Carmarthenshire
SA31 1LQ

The Planning Studio, Hayston Bridge
Johnston, Haverfordwest
Pembrokeshire SA62 3HJ
01437 891 817
07515 851 704
andrew@haystonplanning.co.uk
www.planningpembrokeshire.co.uk

HAYSTON DEVELOPMENTS & PLANNING LTD is making an application on behalf of the Land Agent, Owen & Owen Chartered Surveyors Ltd and our client, Mr Gwynne Phillips, for the following planning permission:

- **Proposal:** Outline (major) application for residential development (including affordable element) with associated parking and landscaping (all matters reserved except highways)
- **Site location:** Land adjacent The Beeches, Spring Gardens, Whitland, Carmarthenshire, SA34 0HP
- **Type of Planning Permission:** Outline (Major Application)
- **Adopted Local Development Plan Polices:** SP1, SP2, SP3, SP5, SP6, SP9, SP14, SP17, GP1, GP2, GP3, GP4, H1, AH1, TR2, TR3, EG4, EP3, REC2.
- **Local Supplementary Planning Guidance:** Affordable Housing (June 2008); Placemaking and Design (September 2016); Leisure and Open Space (September 2016); Planning Obligations (December 2014); Nature Conservation and Design (Draft only): and Joint Housing Land Availability Study (August 2019)
- **National Policy:** Planning Policy for Wales (PPW), Edition 10, December 2018. TAN's 2 – Planning and Affordable Housing (2006); 5 – Nature Conservation and Planning (2009); 6 – Planning for Sustainable Rural Communities (2010); 12 – Design (2016); and 18 – Transport (2007).

1.0 INTRODUCTION

1.1 Please find enclosed the following:

- **Planning Support and Justification Statement** (this document)
- **Application form and certificates of ownership**
- **Drawing 01-** Location Plan at scale A3 @ 1:2500
- **Drawing 02 -** Existing Topographical Site Survey at scale A2 @ 1:500
- **Drawing 03 –** Proposed Site Layout Plan at scale A2 @ 1:500
- **Appendix A -** Design and Access Statement
- **Appendix B –** Maps of Utility Services provided by Welsh Water dated December 2020

- **Appendix C** – Ecological Appraisal by Gould Ecology dated November 2020 – ***This is currently in draft but will be updated following feedback from the consultation exercise.***
- **Appendix D** – Tree Survey Report (ARW tree consultancy, 8th February 2021)
Note: The Unilateral Undertaking and Certificate of Title in respect of Affordable Housing will be submitted and completed during course of application)
- **Planning fee** - £9,200 (based on £460 per 0.1 ha)

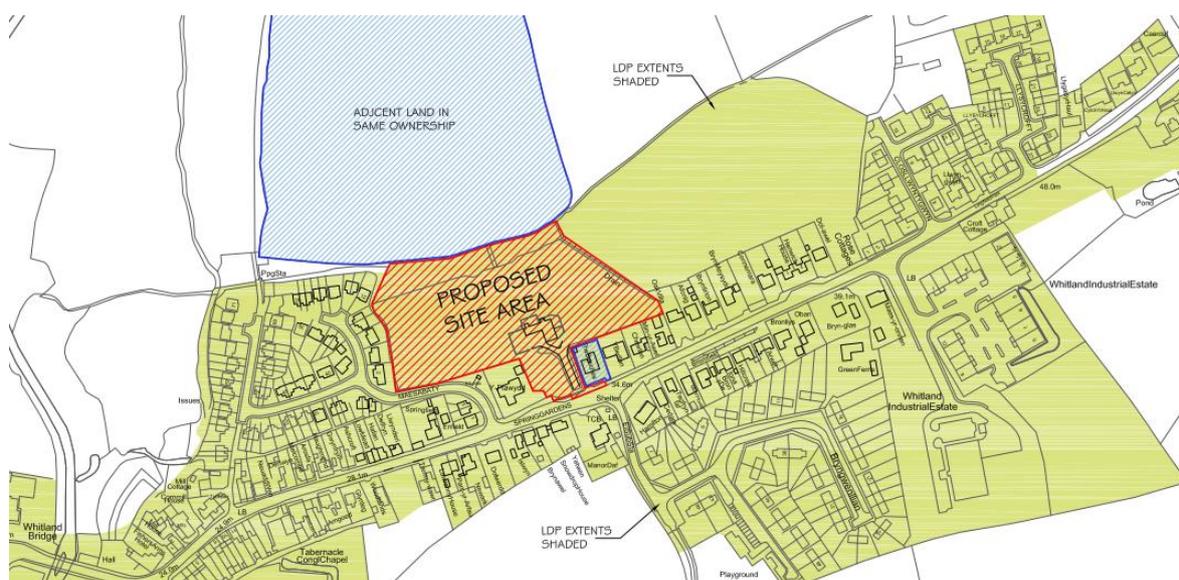
1.3 This report is prepared in accordance with the requirements of both national and local planning policies, including the *Adopted Local Development Plan 2014 for Carmarthenshire* and incorporates local requirements for the validation of planning applications and the Welsh Government Development Manual (May 2017).

1.4 The application seeks to establish the principle of the residential development of the site, to be assessed under planning policy position as set out under the currently adopted local Development Plan for the area. This Plan shows the application site to form part of two housing site allocations which is a highly material consideration in the assessment of the proposal. The site is entirely suitable for an appropriate amount of residential development.

2.0 LOCATION AND SITE DESCRIPTION

2.1 This application relates to an irregular shaped piece of land located on the northern side of the B 4328, known as Springfield Gardens, towards the eastern part of the settlement of Whitland. The site comprises some amenity land adjacent to the property 'The Beeches' and a large field located behind existing development along Springfield Gardens and residential development in Maesabaty to the west.

2.2 The drawing below shows the location and extent of the application site in relation to the defined Settlement Boundary.



Location Plan – Drawing Extract P01

2.3 Within the site, set back from the road frontage but clearly visible in the gap between frontage development, are some barns which have permission to be converted into four dwellings with associated parking. That development has been substantially completed.



Barn conversion development looking north)

2.4 The site has a total area of 1.94 ha and slopes down towards a stream which crosses the lower rear section of the site. There is some hedging along part of the site frontage. There is a field gate access towards the west which serves the field further to the north. There are boundary walls/fencing along the side boundaries to The Beeches to the east and Y-Ffawydd to the west and to the rear of nearby properties which back onto the wider site. The rear of the site is generally enclosed by lower field type fencing of varied height and a mixture of trees, hedging and other vegetation. There are mature trees of varied type located along the eastern and western boundaries, together with ditches which feed into the stream, with some mature Oak trees along part of the northern boundary. The following photographs are of the application site, and which illustrate the high degree of natural screening around its boundaries:



Looking east across site



Looking north-west across site, with mature Oak trees along rear boundary

2.5 The site slopes away from the road towards the stream, a fall of some 3 metres over its depth. There is also a noticeable slope down from east to west across the width of the site of some 5 metres. There is a track and separate foot bridge over the stream towards the rear of the site, providing access to a larger field further to the north. This additional field and the property, 'The Beeches' are in the same ownership as the applicants.



Street Scene View of Site Frontage – Source: Google Street View 2021

2.6 The B 4328 is the main road through the village and which links to the A40 at either end. It is subject to a 30mph speed limit. There is an informal layby in front of the adjacent property to the west of the site frontage. The road has the benefit of street lighting. There is also the evidence of an existing partly surfaced access route into the site and which serves the barn conversion development and future housing.

2.7 The pattern of development in the settlement is generally ribbon in nature following the arterial routes in all directions. However, there are examples of cul-de-sac type estate development off the main roads, such as at Maesabaty to the west of the site and Bryngwenllian on the opposite side of the road. Maesabaty is a modern residential development of predominantly two-storey dwellings.

2.8 Although residential development that has taken place varies in age with some differences in architectural style and materials, the general style of development is terraced or semi-detached in form, with buildings predominantly two storeys in height. However, there are some examples detached and single-storey dwellings nearby along the northern part of the main road. Many dwellings are modest in size and scale with some sited close to the road frontage.

3.0 PLANNING HISTORY AND BACKGROUND

3.1 The application site lies within the defined settlement boundary of Whitland as part of the currently adopted Local Development Plan 2014.

3.2 The application site also falls part of a housing site allocation site (reference T2/6/h3) and the western part of an adjacent housing allocation site (reference T2/6/h4) as part of Policy H1 of the adopted Local Development Plan 2014. The first allocation relates to land adjacent to Maesabaty with a total of 72 dwellings allocated. The second allocation relates to a larger area of land to the back of properties to the north of Springfield, with a total of 64 dwellings allocated.

3.3 These are two of six housing site allocations for the settlement of Whitland, with a total stated housing allocation of some 205 dwellings. However, most of these allocations are to be removed as housing sites as part of the Local Plan Review with the subject land being re-designated as lying in countryside beyond the settlement boundary limits.



Inset Map for Whitland – Adopted LDP 2014

3.4 The application site has been the subject of previous applications for residential development, including the conversion of the existing barn building, together with the formation of an estate access road into the land from Spring Gardens.

3.5 In July 2008 full planning permission was granted for the formation of an estate road access into the application site from Spring Gardens (reference W/19025). The access road had a width of 5.5 metres with 1.8metre wide pathways either side, appropriate kerb radii and required visibility sight lines of 2.4 metres by 90 metres in both directions. The existing barn building on site was shown to be unaffected. The approved Site Layout Plan is provided below and clearly was designed for a housing estate:



Approved Site Layout Plan – W/19025

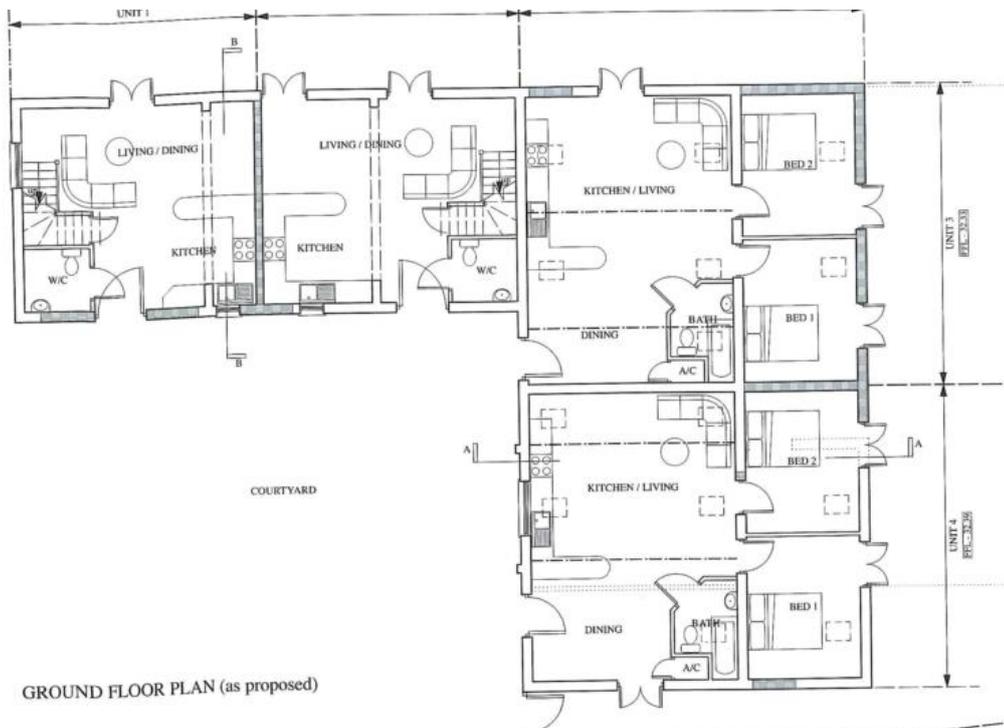
3.6 The proposal was considered to represent an appropriate form of development and was not likely to cause harm to highway safety.

3.7 In May 2013 planning permission was granted for the conversion and alteration of the outbuilding on land to the rear of The Beeches into 4 residential units. The building was part two-storey and part single-storey. An adjoining shed to the east was shown to be removed. Use was to be made of the previously approved estate road access. 10 parking spaces were to be provided on the western side of the site.

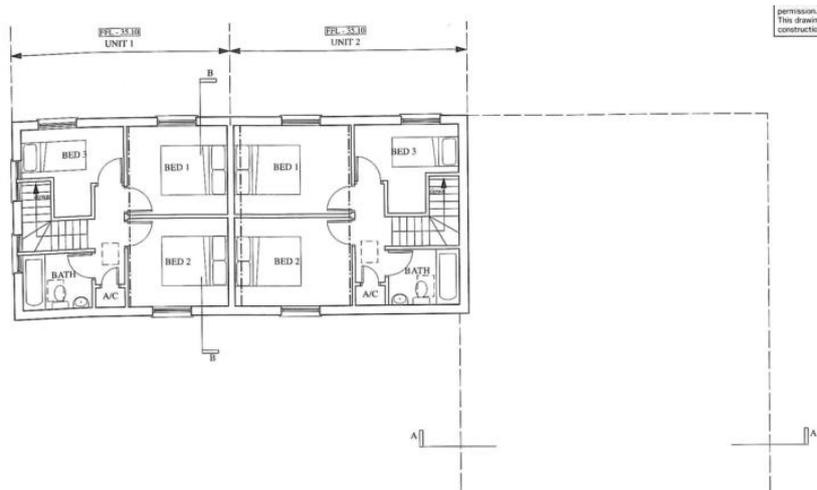


Approved Site Layout Plan – Reference W/27413

3.8 The development comprised two 3-bedroom dwellings on two-storeys within the northern part of the building and two 2-bedroom dwellings on the ground floor only within the eastern part of the building.



Approved Ground Floor Plan – Reference W/27413



Approved First Floor Plan – Reference W/27413



SOUTH ELEVATION (as proposed)



Proposed South and West Elevations – Reference W/27413



NORTH ELEVATION (as proposed)

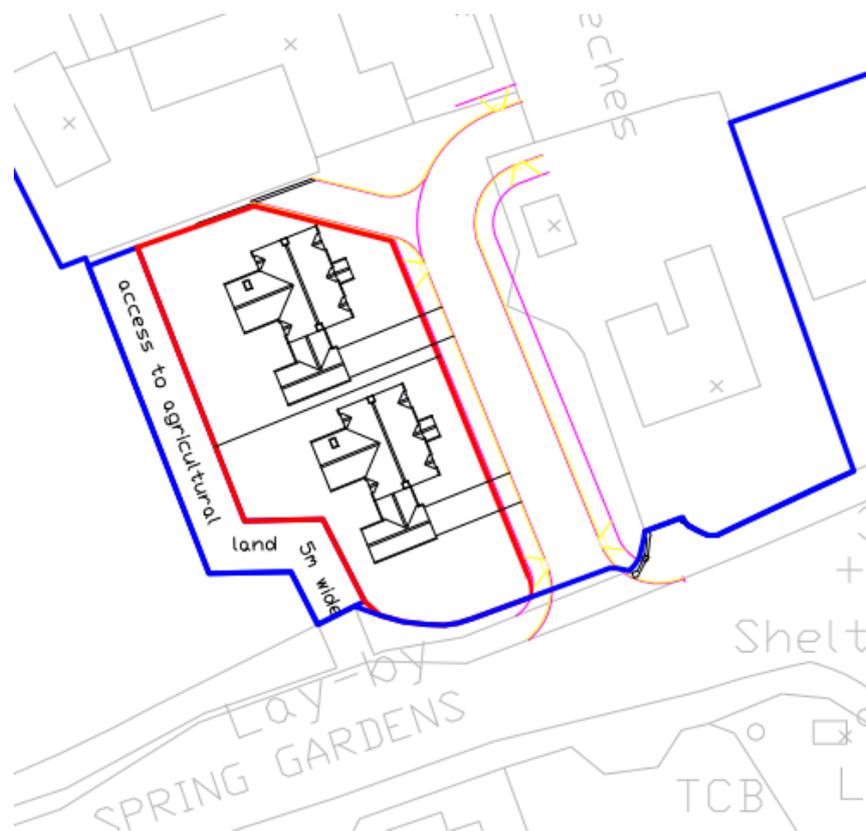


Proposed North and East Elevations – Reference W/2713

3.9 In allowing the development, the Council considered that the building was sufficiently structurally sound and large enough to accommodate the proposed use; that it would not give rise to unacceptable issues in respect of access and highway safety, amenity, nature conservation or the provision of services. The design was also considered appropriate and in-keeping with the character of the existing building and surrounding area. The permission was the subject of various conditions, including securing appropriate access and parking arrangements.

3.10 That development has been substantially completed. That development is shown to be completed as part of the current application and incorporated into the overall layout of the new residential development for the wider site. However, as part of the current application, the site boundaries of this development are to be adjusted in order to accommodate the new road layout and the four new dwellings to be located to the north-east. Whilst the resultant gardens would therefore be of a different shape, they would still be of adequate size to serve the size of dwellings proposed. It will be demonstrated later in this statement that this element of the application would have a satisfactory relationship with the proposed new dwellings.

3.11 In June 2014 outline planning permission was granted for the erection of two detached dwellings on land to the western side of the proposed estate road access (reference W/29884). The application was submitted in outline form with all matters reserved for subsequent detailed approval. The dwellings were indicated to be of the same size and form with their front elevations facing the estate road access, approved under application W/19025. The approved Site Plan is provided below and shows a linked future area with road and footpaths into the adjoining fields:



Approved Site Layout Plan – Reference W/29884

3.12 That proposal was considered to be in accordance with planning policy, lying within the defined Settlement of Whitland and being acceptable in highway safety terms.

3.13 The permission was the subject of several conditions. These included that prior to the commencement of development and any use of the estate road, the estate road shall be constructed to the required dimensions including width, pathways, radii and sight line visibility zones at its junction with Spring Gardens.

3.14 In respect of the current application, it is proposed to 'make use' of these two permissions, with the entire development to be served of the new estate road access. Two detached dwellings are also proposed to be sited on this part of the site but with the access to agricultural land no longer retained but incorporated into the rear gardens of the two dwellings. The northern most dwelling has been sited slightly further to the west and into its plot.

3.15 The site remains within the Settlement Boundary for Whitland as defined in the currently adopted Local Development Plan 2014 and forms part of a wider site allocation. Therefore, it is entirely suitable for residential development in a sustainable location.

3.16 At this point, it is also worth noting that the area of land to the east of the application site (and which forms part of housing site allocation T2/6/h3) has been the subject of planning applications for residential development.

3.17 This adjacent site has been the subject of an application for outline planning permission, and subsequent permission for approval of reserved matters. An outline planning application (reference W/17567) was submitted in October 2007 for the residential development of a site area of 2.74 ha served off a new vehicular access from Spring Gardens, this was not granted permission until March 2012. It was also subject to the applicant's entering into a Section 106 Agreement to secure certain community benefits, including 25% affordable housing.

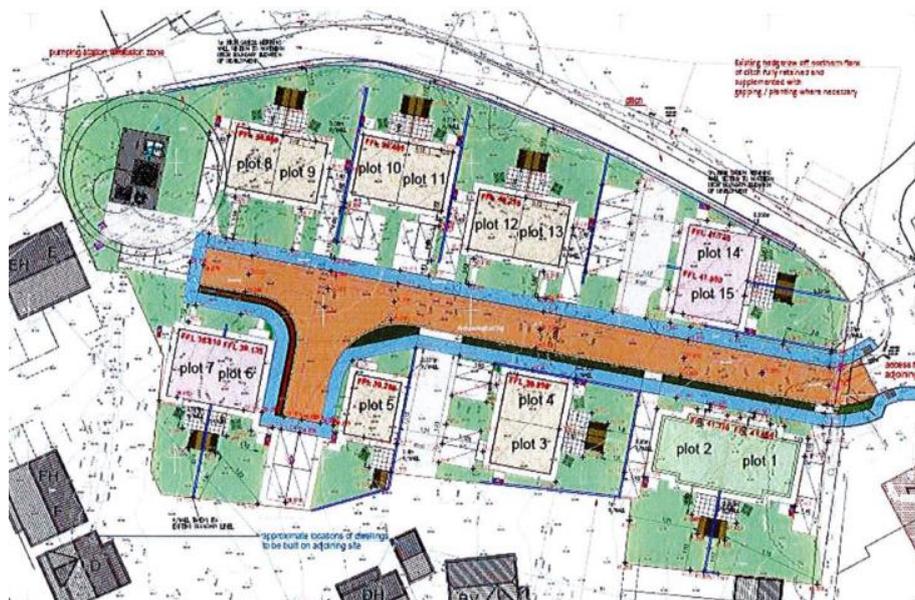
3.18 An application (reference W/30269) was submitted in June 2014 to extend the time period for the submission of reserved matters by a further three years. This was granted permission in July 2014. An application (reference W/35037) was subsequently for the approval of reserved matters submitted in January 2017 and was approved in May 2017. This involved the erection of 70 dwellings including some 17 dwellings for affordable housing, located towards the north-eastern part of the site, close to the adjacent Clos Llwyn Ty Gwyn housing cul-de sac. Following an application for the discharge of conditions (reference W/36386) being approved in March 2018, this development has technically been implemented and is therefore extant. The approved Site Layout Plan with the affordable element highlighted) is provided on the next page:



Approved Development on Land to East – reference W/35037

3.19 We understand there is a current planning application before the Council which specifically relates to the affordable element of the approved development (PL/00668). The application is submitted on behalf of a Housing Association and seeks to 'separate' this element from the wider market housing development so that it is not dependent that developer's timescales. This application proposes a separate vehicular access via the adjacent Clos Llwyn Ty Gwyn cul-de sac with an adjustment to the site layout and a reduction in the number of affordable dwellings from 17 to 15 on this part of the wider site. The remaining market housing would continue to be served from the new access directly from Spring Gardens. This was approved on 23rd February 2021.

3.20 The proposed revised Site Layout Plan in respect of the affordable housing element is provided below. However, the agent for this application points out that this latest application would not affect the layout for the approved market housing element on this adjacent site.



Proposed Revised Affordable Housing Layout – PL/00668

4.4 The proposal displayed within the illustrative Site Layout Plan shows a cul-de-sac type layout with vehicular access being taken from Spring Gardens, the position of the approved estate street access under approved application reference W/19025. The access would turn into the site north-east to serve the new housing, with a spur road to serve the retained converted barn development.

4.5 The proposed main vehicular access and internal access roads would be designed to County highway requirements. The main vehicular access would meet requirements in terms of width and associated pavements, alignment and with visibility sightlines of 2.4 metres by 90 metres in both directions. The internal access roads would also be constructed to adoptable standards. The proposed layout also includes an alternative pedestrian link within the development, suitable for people with mobility issues.

4.6 The proposal aims to maximise the site area with mainly semi-detached dwellings, but with examples of terraced dwellings and a sprinkling of eight individual dwellings spread throughout the site. Many of the dwellings would directly face the internal access road with private and secure rear gardens. There would also be some landscaped areas to frontages. Two detached dwellings are proposed to be sited off the main site entrance in the position of two dwellings previously granted outline permission under application reference W/29884 (now lapsed).

4.7 All of the proposed dwellings would have the benefit of at least two parking spaces, directly associated with the individual dwellings, although the layout includes a small communal parking area towards the south-eastern corner. Some of the larger detached dwellings would have the potential for the inclusion of garaging as part of their layout and design.

4.8 The proposal indicates the provision of five different dwelling types, all indicated to be modest in size and scale, being 1.5-2 storey in form. All dwellings are indicated to have ridge heights of between 6.5-8.5 metres with roof pitches of between 30-45 degrees, thereby allowing for flexibility in the final designs for the proposed dwellings.

4.9 The proposal indicates the provision of 38 Type A dwellings (2-3 bed); 1 Type B dwelling (3-4 bed); 2 Type C dwelling (3-4 bed); 3 Type D dwelling (3-4 bed); and 2 Type E dwelling (3-4 bed unit). Therefore, a varied range of dwelling size is indicated, noting any final layout and dwelling mix would be determined at the reserved matters stage.

4.10 Affordable housing is proposed to be provided throughout the development, at the policy requirement of 30% of the unit total or an alternative financial contribution to be agreed with the Council.

4.11 The proposed layout would achieve a density of 25.8 dpha, which includes the existing barn conversion of four residential units.

4.12 The scale, style and appearance of the proposed dwellings would fully reflect that of the immediately surrounding development, but also that which has been granted on the adjacent site to the east. The dwellings would incorporate simple architectural features and high-quality external

materials and finishes. An illustrative Contextual Elevation is provided of the group of dwellings on the eastern part of the site.



Illustrative House Types Section A-A – Drawing Extract P03

4.13 All existing boundary screening is shown to be retained with the development sited away from sensitive site boundaries. Additional and supplementary planting is proposed, such as between and within the rear garden areas and importantly, the incorporation of a new native hedgerow bank to separate the development from the stream within the lower northern part of the site. This would not only help to integrate the proposed development into its surroundings but to assist in safeguarding the privacy of the neighbours and would also enhance biodiversity interests.

4.14 Surface water drainage for individual dwellings would be provisionally discharged to soakaways within gardens, subject to ground tests and SABS design and approval.

4.15 We understand that utility services are available at or very near to the site, including a mains sewer system along the centre of the main road. This is confirmed by correspondence from Welsh Water (see **Appendix A**). The proposed Site Layout Plan provides for an adopted foul water pumping station to be accommodated if necessary, with a suggested pumped foul water route shown through the site. The pumping station is shown to be located on lower ground towards the north-western corner of the site, on the opposite side of the stream, set within a suitably fenced compound and away from nearby residents. The internal estate access road would be extended over the stream (incorporating a suitable culvert) in order to provide appropriate access to the pumping station and the maintenance of access of the field further to the north.

4.16 Full design of the site drainage arrangements can be carried out at the detailed planning stage and complies with SUDs.

5.0 POLICY ASSESSMENT

5.1 This application seeks to establish the principle of the residential development of the site, together with highway safety considerations. Whilst other matters, such as layout, design and landscaping and appearance are reserved at this stage, we provide an illustrative site layout plan and proposed elevations in order to show how the overall proposal would be acceptable for this site and location.

5.2 The application site is identified in the currently adopted LDP 2014 as falling within the defined Settlement Boundary of Whitland. It also forms part of two housing site allocations and is therefore considered suitable for residential development.

5.3 We note that part of the current Local Plan Review, the Council is proposing to exclude the application site from the defined Settlement Boundary with the housing site allocations also omitted. We note that another housing site allocation located towards the eastern end of the village is also shown to be removed as part of the Local Plan Review.

5.4 We understand that at an Executive Meeting of the Council in October 2019, they approved a Draft Deposit Plan for consultation with possible submission to the Welsh Government in August 2020 for an EIP and formal adoption by December 2021. Having regard to the effects of Covid-19 the Council issued a revised Delivery Agreement document in November 2020. This indicates a significant delay in its preparation with independent Examination now indicated to be July-December 2021 and possible adoption July-August 2022. Therefore, given the stage reached and that important policy issues still need to be fully considered and 'tested', we argue that only limited weight can be given to this emerging Plan. One of the key issues will relate to housing provision and land supply and whether the Plan makes adequate provision for new housing over the Plan period to 2033.

5.5 The latest Annual Monitoring Report 2018-19 refers to the 2018 JHLAS which calculates a housing land supply of 3.5 years. This represents a decrease in the previous study which indicated a supply of 3.8 years. This has also constituted the sixth year where a 5-year supply has not been achieved. This lack of an adequate housing land supply also weighs significantly in favour of the proposal, which would contribute towards the housing needs of the village and wider County area.

5.6 We therefore strongly contend that this planning application be assessed against the currently adopted LDP 2014, which clearly indicates its suitability for new housing. The currently adopted Plan should therefore be afforded much greater weight.

NATIONAL POLICY

5.7 *Planning Policy Wales: Edition 10* (PPW) published in December 2018 provides the overarching policy framework against which all planning applications are to be determined. The key focus is on achieving sustainable development which is defined as follows:

'...the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.'

5.8 The document seeks to achieve well-being through the concept of 'placemaking' which considers the context, function and relationships between a development site and its wider surroundings, whilst being focused on positive outcomes.

5.9 The proposal comprises a sustainable form of development and would create a well-designed and attractive residential environment. The new dwellings would be of good design, creating an

environment where people want to live, work and socialise.

5.10 The proposal would achieve social objectives in the provision of new housing and where occupiers would be able to integrate into the local community and support local services and facilities; there would be an appropriate contribution towards the provision of affordable housing; it would achieve economic objectives in providing employment in the construction industry; and environmental objectives by not only minimising the impact of development on the local character and amenities of the area but also safeguarding the ecological interests of the area.

5.11 The proposal offers the opportunity to provide more clearly defined boundaries to this part of the settlement. The proposal would effectively comprise the logical 'rounding off' of development land which physically and visually well-related to the settlement and not a stand-alone addition in the countryside. Planning Policy Wales (PPW) (Edition 10) advises that Local Plans should resist development '*in the open countryside, away from established settlements*' (paragraph 4.2.24), but recognises the important role of '*infill and windfall sites within settlements*' (4.2.24). PPW 10 also states that '*minor extensions to existing settlements may be acceptable ... However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled*' (Paragraph 3.56). PPW 10 clearly distinguishes between sites '*in the open countryside, away from established settlements*' and those which provide infilling or minor extensions (rounding off) of existing settlements.

5.12 The site is allocated for housing development in the adopted local Development Plan. Upon the implementation of the approved development adjacent to the east, the site would be substantially surrounded by housing development on three sides, with direct vehicular access from Spring Gardens. There is also clear physical and visual boundary line to the site to the north, provided by the stream and some mature trees beyond. This boundary can also be reinforced. As such, this site should be looked at more favourably for development and as a suitable 'rounding off' to development in the locality and which would contribute towards the housing needs of the County.

LOCAL POLICY

Location and Principle of Development

5.13 Policy SP1 states proposals for development will be supported where they reflect sustainable development and design principles. These include distributing development to sustainable locations in accordance with the settlement framework, supporting the roles and functions of the identified settlements and promoting, where appropriate, the efficient use of land including previously developed sites. Policy SP3 sets out the settlement framework.

5.14 In the Settlement Hierarchy the settlement of Whitland is listed as a 'Service Centre' being located on a sustainable transport corridor between Pembrokeshire and Carmarthenshire and has an important service role in terms in serving the wider hinterland. It offers scope for future development and regeneration.

5.15 Policy GP2 states that proposals within defined Settlement Limits will be permitted, subject to local and national policy and other material considerations. The proposed development would be confined within the defined Settlement limit of Whitland.

5.16 Whitland is a small town on the border of Carmarthenshire and Pembrokeshire with a population just over 2000. The town has many different facilities including a large secondary school serving the local and wider community. It has a train station with regular services to Carmarthen and Pembroke and other towns and villages. There are also several nearby bus stops with services to St. Clears, Carmarthen and Narberth. There is a supermarket and several diverse locally owned food and other retailers within the town, located only some 500 metres to the west of the site.

5.17 The proposal utilizes an underused, parcel of land in a sustainable location and represents the efficient use of land within the defined Settlement limits of the village. The site is allocated for housing development.

5.18 The proposal therefore represents a sustainable form of development, fully in accordance with both national and local planning policy.

Housing Provision and Supply

5.19 Policy SP5 states that in order to ensure the overall land requirement of 15, 197 dwellings for the plan period 2006 to 2021 is met, provision is made for 15, 778 new dwellings. The Plan states that sufficient land is allocated (on sites of 5 or more dwellings) to accommodate 13, 352 dwellings in accordance with the Settlement framework. This figure includes some 1,360 dwellings within the Service Centres. However, the Council would appear to be struggling to meet its housing requirements, given its 5-year housing land supply position in recent years.

5.20 The LDP explains that a key source in meeting the identified land requirement is through sites allocated for residential development within the LDP in the form of housing allocations identified through Policy H1 or as part of a mixed use allocation as set out in Policy EMP5.

5.21 Policy H1 sets out a table of housing site allocations across the County. The table includes some 6 individual sites in Whitland (T2/6) with a total provision of some 205 dwellings. The current application proposal forms part of two housing site allocations (references T2/6/h3 and T2/6/h4). However, these are currently the subject to review.

5.22 The policy states that proposals for the residential development of allocated housing sites submitted in the form of a full planning application or as a reserved matters application should be accompanied by a layout of the proposal in its entirety to ensure the site is developed to its full potential.

5.23 The indicative layout and scale parameters suggest a variety of house size and type, reflective of the wider settlement, including the adjacent residential development in Maesabaty to the west of the site. However, it is recognised that the final dwelling mix would be determined at the reserved matters stage, following further consultation with the Council.

5.24 The supporting paragraphs 6.2.13 to 6.2.15 specifically relate to development densities. They state the following:

'Development densities have been calculated based upon an initial standard of 30 per ha within the growth areas, 25 per ha for the service centres and local service centres, with 20 per ha utilised within the sustainable communities. Their application on a site by site basis has, however, been informed by the form of a settlement in terms of whether it is predominantly urban or more rural in context. It also takes into account settlement and the site characteristics and site development factors.

These nominal densities have, where appropriate, been amended to reflect local and site circumstances such as topography and physical constraints and are intended to be indicative. It is anticipated that they will be subject to further consideration at the application stage.

In formulating proposals, site layout design should relate to adjacent sites. Where appropriate, the potential for shared access should be incorporated into the proposed layout.'

5.25 The layout and density of the proposed development takes into account the pattern and form of Whitland as a settlement. Whilst there is lower density development along the road such as in the vicinity of the site entrance, there are examples of higher density development along the road. There are also areas of higher density cul-de-sac developments throughout the village, such as at Maesabaty to the west and Bryngwenllian on the opposite side of the main road.

5.26 The development proposal would achieve an overall density of 25.8 dpha, which would be in full accordance with the above policy advice in respect of Service Centres. The density of the proposed development would be similar to that granted permission on the adjacent land to the east (reference W/35037). The incorporation of the two detached dwellings on the site frontage would more closely reflect the pattern and density of development along the northern side of the main road.

5.27 The proposal takes fully into account the site's physical constraints, such as its shape and relationship to the adjacent estate development. The proposed development would be sited away from the important natural site features, such as trees and the stream, which exist along the site's boundaries. The proposal allows for a generous 'buffer zone' to be retained on either side the stream on the northernmost section of the site.

5.28 The proposed indicative site layout also allows for a suitable vehicular access to be provided, which would not only serve the proposed new housing but also the existing barn conversion, located within the front section of the site. The site access would be sited in a logical position and would effectively be shared with other development.

5.29 Therefore, the current proposal seeks to make the optimum use of the site for residential development whilst having full regard to its location, site constraints and relationship to the adjacent development.

Affordable Housing

5.30 Policy SP6 states that provision will be made for at least 2,121 of affordable homes to be delivered through the LDP. The delivery of affordable homes will contribute to the creation of sustainable communities within the Plan area.

5.31 Policy AH1 states that a contribution towards affordable housing will be required on all housing allocations and windfall sites. The Council will seek a level of affordable housing contribution of 30% in the higher viable areas, 20% in the middle viable areas and 10% within the Ammanford/Cross Hands sub-market areas. Where viability at the target levels cannot be achieved, variation may be agreed on a case-by-case basis. It also states that the affordable housing will be required to be provided on proposals for 5 or more dwellings in all settlements.

5.32 The application site falls within a defined settlement in the LDP 2014 and being within the 'higher viable area' is therefore subject to a 30% Affordable Housing Viability Target Figure. It is therefore anticipated that the 30% requirement will be applied to the proposed 46 new dwellings only, therefore resulting in some 14 of the total to be in the form of affordable dwellings. These are likely to be dispersed throughout the site.

5.33 The Council's Affordable Housing SPG explains that where the percentage leads to a 'fraction of a unit', this fraction should be via a commuted sum. In this case, it would 0.5 of a unit.

5.34 The above affordable housing contribution on site would be secured by an appropriately worded Section 106 Agreement, with final details of the unit to be agreed with a Registered Social Landlord or intermediate house for sale.

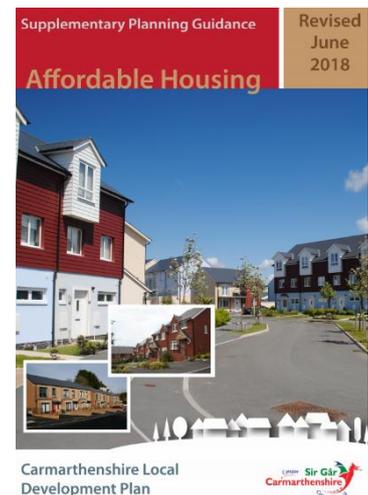
5.35 Whilst the adopted SPG does allow the option of affordable payments in commuted sums, it is anticipated that affordable housing is likely to be provided on site.

Transport

5.36 Policy SP9 states that provision is made to contribute to the delivery of an efficient, effective, safe and sustainable integrated transport system, through a series of measures. These measures include reducing the need to travel, particularly by private motor car; addressing social inclusion through increased accessibility to employment, services and facilities; promoting non-car modes of transport; and reinforcing the function and role of settlements in accordance with the settlement framework.

5.37 Policy GP1 states that appropriate access should exist and can be provided which does not give rise to any parking or highway safety concerns on the site or in the locality. The proposed access arrangements are the same as that proposed and found to be acceptable by the Council in respect of the previously approved application reference W/19025 granted in July 2008. The proposed new access would be positioned logically in order to optimise sightline visibility and which allows the front parcel of land still be developed with two detached dwellings, as previously granted under outline application W/29884 in June 2014.

5.38 The proposal demonstrates that effective and safe vehicular access can be achieved from Spring Gardens (B 4328) with the use of a partly completed estate road off that carriageway. The internal estate road layout would also provide future residents and visitors with complete adoptable carriageways and footways, allowing for safe vehicle passage and pedestrian segregation.



5.39 The proposed layout provides an integrated network which promotes the interests of pedestrians and cyclists with convenient access to public transport options and services in the village. For example, there would be a direct pavement connection onto Spring Gardens. The focus has been to achieve a highly legible development, and which satisfactorily integrates into its immediate surroundings.

5.40 The indicative site layout shows that adequate car parking and turning can be provided to serve the development. The site layout would also allow service vehicles to enter and leave the site satisfactorily. The proposed level of parking at the site would comply with current local guidelines and that there is sufficient off-street parking either within the curtilage of each house or alternatively small communal areas.

5.41 Accessibility to/from the site has been considered in detail and the location of the buildings optimises safe level access for pedestrians, vehicles and visitors with disabilities, and would be acceptable in overall highway safety terms.

Nature Conservation and Ecology

5.42 Policy SP14 states that development should reflect the need to protect and wherever possible, enhance the County's natural environment, with due consideration given to areas of nature conservation value, the countryside, the best and most versatile agricultural land and areas of special landscape value.

5.43 In accordance with Policy GP1 the proposal would embrace an opportunity to enhance biodiversity and ecological connectivity. For example, any existing important natural features within around the boundaries of the site would be retained. The existing stream which passes through the lower northern area of the site would be protected from the development, with a buffer zone provided. The proposed development has been sited away from the site boundaries where there are some important groups of mature trees and hedgerows, including a short section of hedgerow along part of the site frontage. Additional and supplementary planting is indicated as part of a possible robust landscaping scheme, with additional native hedgerow planting provided between the proposed dwellings, together with some additional tree planting, together with a significant new native hedge bank feature to run along the southern side of the stream.

5.44 Policy EQ4 states that proposals for development which have an adverse impact on priority species, habitats and features of recognised principal importance to the conservation of biodiversity and nature conservation, will not be permitted. Further, that impacts can be satisfactorily mitigated, acceptably minimised or appropriately managed to include net enhancements.

5.45 The application is accompanied by an Ecological Appraisal dated November 2020 (see **Appendix C**). The overall findings indicate the site largely comprises poor semi-improved grassland, the majority of which had recently been managed by cutting for silage and that no protected habitats or species would be materially affected by the proposal. Whilst it notes that a marshy area of land situated towards the north-west would be 'lost' as a result of the proposal, it states that this

GOULD ECOLOGY
Ecological Consultants

Proposed New Housing on
Land adjacent to 'The Beeches'
Spring Gardens
Whitland
Carmarthenshire
SA34 6HP

Preliminary Ecological Appraisal
January 2021
(Version 2 - Draft)



Gould Ecology, 10001 11th, Fording, Cheshire, CH61 0JF
Tel: +44 (0)1293 55151 / 07795 455545 | info@gould ecology.co.uk

can be sufficiently mitigated. The Appraisal makes various recommendations which would enhance the biodiversity value of the site. Although the application is submitted in outline form only, these measures can be satisfactorily incorporated into a subsequently agreed final layout and secured by a suitably worded condition if required by the Council.

5.46 Below is a scan of the key 'Findings, Appraisal and Ecological Mitigation Recommendations' as set out in the Ecological Appraisal:

| <p>Key Findings:</p> <ul style="list-style-type: none"> • Site boundaries on the eastern and western margins comprised continuous native tree line - priority habitat features; • The stream crossing the site connects with the Afon Gronw 150m to the west; • Approximately 3939m² marshy grassland habitat also occurred within the site; • Boundary tree-lines had potential value to bats (roosting and commuting), and had some features indicating suitability for dormouse (sub-optimal / lower probability of occurrence). • Some habitats at the site also had potential value for nesting birds, hedgehog and occasional use by grass snake; • Badger and otter are likely to be active in the vicinity, and could potentially disperse through the site or forage in the area on an occasional basis. | | | | | |
|---|---|---------------------------|---------------------------|--|---|
| <p>Appraisal</p> <p>In the absence of mitigation or impact avoidance measure, development at the site would have potential to cause adverse ecological impacts to the following ecological features:</p> <ul style="list-style-type: none"> • Continuous hedgerows (tree-lines), Stream connected to the River Gronw (<i>Priority habitats</i>), • Marshy grassland (<i>Habitat valued at the District Scale</i>), • Bats, Dormice and Otter (<i>Conservation of Species and Habitats Regulations, 2017</i>), • Nesting birds and Grass snake (<i>Wildlife and Countryside Act, 1981</i>), • Hedgehog (<i>Priority species</i>). <p>However, it would be possible to avoid, mitigate or compensate all potentially adverse impacts through construction methodologies which protect valuable ecological features, by retaining and protecting the most valuable habitat features (tree lines, stream corridor) and by designing a scheme of habitat creation and enhancement.</p> | | | | | |
| <p>Summary of Ecological Mitigation Recommendations</p> <table border="1"> <thead> <tr> <th><i>Construction Phase</i></th> <th><i>Medium - Long Term</i></th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> • Protection of tree lines and stream corridor from physical damage; • Pollution control measures implemented; • Pruning of trees to be undertaken under ecological method statement as required; • Site clearance methods to include measures to minimise the risk of disturbing nesting birds, hedgehog and reptiles; • Pre-commencement check for any new badger setts at the site. </td> <td> <ul style="list-style-type: none"> • Tree-lines on the eastern and western boundaries to be retained in the long term with habitat buffer; • Stream corridor to be retained in the long term with habitat buffer; • Mature oak trees on the northern boundary to be retained • Site drainage to be designed to avoid pollution risks to the watercourse; • Night-time illumination of tree lines on the eastern and western boundaries to be avoided; • A scheme of habitat creation and enhancement to be implemented. </td> </tr> </tbody> </table> | | <i>Construction Phase</i> | <i>Medium - Long Term</i> | <ul style="list-style-type: none"> • Protection of tree lines and stream corridor from physical damage; • Pollution control measures implemented; • Pruning of trees to be undertaken under ecological method statement as required; • Site clearance methods to include measures to minimise the risk of disturbing nesting birds, hedgehog and reptiles; • Pre-commencement check for any new badger setts at the site. | <ul style="list-style-type: none"> • Tree-lines on the eastern and western boundaries to be retained in the long term with habitat buffer; • Stream corridor to be retained in the long term with habitat buffer; • Mature oak trees on the northern boundary to be retained • Site drainage to be designed to avoid pollution risks to the watercourse; • Night-time illumination of tree lines on the eastern and western boundaries to be avoided; • A scheme of habitat creation and enhancement to be implemented. |
| <i>Construction Phase</i> | <i>Medium - Long Term</i> | | | | |
| <ul style="list-style-type: none"> • Protection of tree lines and stream corridor from physical damage; • Pollution control measures implemented; • Pruning of trees to be undertaken under ecological method statement as required; • Site clearance methods to include measures to minimise the risk of disturbing nesting birds, hedgehog and reptiles; • Pre-commencement check for any new badger setts at the site. | <ul style="list-style-type: none"> • Tree-lines on the eastern and western boundaries to be retained in the long term with habitat buffer; • Stream corridor to be retained in the long term with habitat buffer; • Mature oak trees on the northern boundary to be retained • Site drainage to be designed to avoid pollution risks to the watercourse; • Night-time illumination of tree lines on the eastern and western boundaries to be avoided; • A scheme of habitat creation and enhancement to be implemented. | | | | |

5.47 An Arboricultural Impact Assessment was carried out by ARW Tree Consultancy in February 2021 and the report included in **Appendix D**. Section 4 of this summarises the findings which are scanned in below and on the following page:

4.1 **Tree removal:** Trees in the table below should be removed for reasons of good arboricultural management and their removal should not be considered when determining the proposal.

| Tree | Reason for removal |
|------|---------------------------|
| T2 | Decay at base |
| T6 | Declining, moribund. |
| T8 | Dead |
| T15 | Advanced ash die back |
| T17 | Moribund |
| T24 | Storm damage to main stem |
| T25 | Moribund |

4.1.1 Tree T14 has a basal cavity and has damage to the main buttress roots on its southern side. Further assessment using invasive techniques is required to establish if this tree can be retained in the developed context.

4.2 **Effects of new development on amenity value on or near the site:** No significant impact on visual amenity as all healthy trees can be retained.

4.3 **Direct impact to retained trees**

4.3.1 There are no direct above ground impacts to the retained trees.

4.3.2 The direct below ground impacts to the trees are listed below.

| Trees | Below ground Constraint | Impact |
|-------|--|---|
| T3 | The roots of T3 encroach into the proposed parking area. | Traditional construction will sever roots and cause compaction of the ground reducing water and nutrient uptake which in turn reduces photosynthesis and potential energy production. However, in this case the area affected is small and there is sufficient compensatory rooting environment contiguous to the measured RPA. |

4.4 **Construction processes of the proposed development:** *Development processes that lead to soil compaction in tree rooting zones and physical damage to trees can adversely affect long-term tree health. This can lead to unnecessary tree loss if not controlled properly on site during the construction.*

4.4.1 Ground compaction caused by movements of construction traffic and indiscriminate storage of materials could have a **high impact** on all the retained trees. Uncontrolled vehicle and pedestrian movements in the root protection areas of the trees' will compact the pore space in the soil, reducing the trees ability to uptake water, nutrients and its ability for root growth, thus leading to their premature decline and eventual death. if they are not protected during construction.

- 4.4.2 Compaction to the soil and direct damage to the trees can be prevented by using a combination of protective fencing and ground protection.
- 4.5 **Modifications proposed to accommodate trees:** No recommendations.
- 4.6 **Infrastructure requirements:** Not applicable.
- 4.7 **Proximity of trees to structures:** Leaf fall is an expected problem when building near trees, although its effects can be mitigated by the use of gutter guards. Using gutter guards and considering the small leaf size of the trees most likely to cause these problems, the resulting impact of the trees on the proposed dwellings will be low.
- 4.7.1 Trees T5, T18, T19, T20, T21, T22, T23 and those in G1 may give rise to fears of dominance to future inhabitants due to their size and proximity to the proposed dwellings. To prevent indiscriminate pruning the Local Authority can protect these trees by serving a tree preservation order.
- 4.8 **Shading:** Trees in G1 will shade the adjacent plots as they are on southern boundary of them. This is expected to be tolerable as the crowns have been lifted that will allow light to pass under the canopies.
- 4.8.1 The canopy of T5 does not directly shade the adjacent plot using the segment described in the Standard; however, ambient light will be reduced due to the large overhang. This can be mitigated by some reduction of the western canopy; this will not adversely affect the amenity value of the tree.
- 4.8.2 Trees T18, T19, T20, T21, T22 and T23 will shade the adjacent plots; however, these trees have already been crown raised and have undergone crown reductions as this problem has already been experienced by the inhabitants in Maes Abaty on the other side of these trees. This previous work and a repeat of it will reduce the problem to a tolerable level.
- 4.9 **Services:** The services are assumed to follow existing routes into the site and therefore will have no impact on the retained trees.

The potential impacts of the development on the retained trees and vice versa can be adequately controlled by a suitable arboricultural method statement and tree protection plan.

Sustainability Credentials

5.48 This application simply seeks to establish the principle of the development of the site, with the final details to be agreed at the reserved matters stage. However, the final proposal would need to comply with the latest Building Regulations (such as Part M) and would accommodate a number of sustainable construction methods and objectives. This would, for example, include appropriate internal dwelling layouts to accommodate people with mobility issues.

5.49 The final layout would incorporate all-inclusive design issues and would allow ease of access for all. The proposed development would be sited on either level or more sloping ground towards the rear section of the site. The final details of the development, such as ground levels, would need to be adjusted, but the proposal will ensure, wherever possible, that gradients will be kept to the minimum possible. Appropriate surface treatments will be provided.

5.50 Policy EP3 states that proposals for development will be required to demonstrate that the impact of surface water drainage, including the effectiveness of incorporating Sustainable Drainage Systems (SUDS) has been fully investigated. Appropriate provision can be addressed at the Reserved Matters stage.

Infrastructure

5.51 Policy SP17 states that development will be directed to locations where adequate and appropriate infrastructure is available or can be readily provided. The LDP therefore supports the economic provision of infrastructure by allocating sites in identified settlements and in accordance with the Settlement Framework.

5.52 Policy GP1 states that a proposal should ensure the satisfactory disposal of surface and wastewater. The service infrastructure connected to the site will include the main sewer, mains water, electricity and telecoms, which are all available locally. However, as with the approved development on land to the east, the indicative Site Layout Plan includes the provision of a foul water pumping station on the lower section of the site. Due to site levels, foul water would need to be pumped up to the existing services located within the main road.

5.53 Therefore, the development would provide infrastructure that is adequate and appropriate to serve the development in accordance with Policy GP4. With regards to storm water drainage, a separate SAB's application / approval will be sought to control this aspect. As such, the development would comply with the sustainable drainage objectives of Policy EP3.

Layout, Scale and Design

5.54 Policy GP1 provides an overarching framework for high design quality in development, conservation and enhancement proposals in the County. It states that development proposals will be permitted where various criteria are met. The proposal would comply for the following reasons.

5.55 It should be stressed that the application is submitted in outline form, with only highway safety to be considered at this stage. However, the submitted illustrative Site Layout Plan demonstrates how the site could be satisfactorily developed with the scale of development proposed, whilst having regard to its edge of village location and the overall character of Whitland.

5.56 The proposal would conform in terms of its siting on the edge of the existing built-up area and would be appropriate in terms of its scale, form, height, design and appearance. The suggested type of materials and elevational treatment would be in-keeping with adjacent development and that found in the wider settlement of Whitland.

5.57 The proposal respects and safeguards the setting of the northern outskirts of Whitland and wider landscape. Whilst the proposal would clearly alter the character and appearance of the land with the introduction of built form the site is well related, in both physical and visual terms, to the existing village settlement. With the implementation of the approved development on the land to the east, the site would be substantially enclosed on three sides by housing development. There would

be limited impact upon the wider landscape, with the surrounding development and the site's natural boundary features would provide a high degree of visual enclosure.

5.58 There would be some impact from the 'formalisation' of the new vehicular access onto 'Spring Gardens (B 4328). However, estate roads off the main road are a common feature of the locality. The existing small section of hedgerow along the site frontage is to be retained and which would provide some screening of the two detached dwellings on this more visible part of the site. Additional screening can be provided following the closure of an existing unused field gate access.

5.59 The proposed housing would be sited back from the road frontage and largely behind existing frontage development. The proposed development would therefore be glimpsed between existing dwellings with some of the dwellings being located on lower ground to the north. The land beyond the stream to the north slopes up to higher ground. The two dwellings proposed on the site frontage simply reflects a previous planning permission on this part of the wider site and which seeks to reflect the pattern and density of development along the frontages to Spring Gardens.

5.60 The proposed development has similar characteristics to that approved on the adjacent land to the east. For example, it would comprise a cul-de-sac housing development with shared access from Spring Gardens, would be sited behind existing frontage development and would have a similar overall density and appearance. There is also estate development to the west of the site.

5.61 The pattern of development in the settlement is generally ribbon in nature following the arterial routes in all directions. Although residential development that has taken place varies in age with some differences in architectural style, built form and the type of dwellings vary in the locality although there is a predominance of detached and semi-detached dwellings with many being modest in scale. The proposed indicate Site Layout Plan simply seeks to reflect this pattern and form of development. Over recent years there have been a couple of larger developments in the area which have included three storey dwellings and towards the south west of the settlement are recent self-build plots which have introduced a number of new house types and styles into the town. The following photographs show existing housing development in the locality (all Google Street View 2021).



Street Scene View Looking East along Spring Gardens ('The Beeches' on the left)



Street Scene Looking West along Spring Gardens (Site on the right)



Existing Development in Maesabaty to west of site

5.62 The scale parameters of the proposed development have been provided as part of the application but are indicative only. The height and scale of the proposed dwellings would be modest and would reflect that of the adjacent estate development, with the houses having single-storey elements and detached bungalow sited towards the western end of the site. This

5.63 The overriding materials are likely to reflect the traditional slate or composite roofs, rendered and brick facades of existing development found within the locality. The submitted Contextual Elevation shows the high-quality type of development that can be achieved on the site.

5.64 The location and orientation of the buildings maximises surveillance from the proposed properties, such as the frontage parking areas, which is an important factor in this edge of settlement location. The existing boundary features will be maintained and will be supplemented by additional planting and fencing where necessary. Each plot will have enclosed private amenity spaces promoting a safe environment.

5.65 Policy REC2 states that all new residential developments of 5 or more units will be required to provide on-site open space in accordance with the Council's adopted standards of 2.4 ha per 1,000 population. However, in the event that the above standards cannot be met on site, or where there is sufficient existing provision already available to serve the development, then off-site financial contributions may be more appropriate. We consider that on-site open space over and beyond private gardens would not be required, therefore, a financial contribution can be offered, if so required by the Council. It is noted that no additional open space provision was required in respect of approved development on the adjoining land to the east. However, this issue could be revisited at the detailed design stage and where layout is one of reserved matters.

5.66 The final design and external appearance of the dwellings and treatment of hard surfaced areas can be agreed at the reserved matters stage. A full and detailed landscaping scheme can also be secured at this stage.

Neighbouring Amenity

5.67 Policy GP1 states that development proposals should not have a significant impact on the amenity of adjacent land uses, properties, residents or communities.

5.68 There is existing residential development on the northern side of the main road which essentially comprises 6 detached dwellings (including the applicant's property The Beeches) together with a section of the estate access road which serves Maesabaty to the west. There is also a small electricity sub-station adjoining the site boundary. At present these dwellings look out onto open land and therefore their outlook would be affected by the development of the site. However, we believe that sufficient separation distances can be achieved with the presence of some trees within the rear gardens of certain properties providing a good degree of screening. Towards the south-eastern corner of the site, the proposed dwellings are either shown to be positioned at an oblique angle or end on to the neighbouring dwellings, together with a small communal parking area.



View towards south-eastern boundary of site

5.69 Likewise, the dwellings along the eastern side of Maesabaty also look out onto open land and therefore their outlook would be affected by the development of the site. However, we believe that sufficient separation distances can be achieved between dwellings with the presence of some mature trees along the boundary would again provide a good degree of screening.



***View towards eastern boundary of site with neighbouring
Maesabaty housing development***

5.70 We have also had regard to the relationship of the proposal to the development which has been approved on the adjacent land to the east (see earlier in this Statement). The approved layout includes a total of 6 dwellings located within the western part of that development, including a communal parking area and foul water pumping station. These dwellings have good sized rear gardens and again the mature trees and other boundary vegetation would also provide a good degree of screening between the two developments.

5.71 The two dwellings proposed on the site frontage would be similar to the scheme approved in June 2014 (reference W/2984). The rear elevations of these dwellings would face towards the rear garden of the neighbouring property, but siting and separation distance should safeguard amenity and privacy.

5.72 Within the development, we believe the proposed indicative Site Layout Plan demonstrates that satisfactory relationships can be achieved between dwellings with privacy provided to garden areas. In essence, the layout of the proposal, including the spacing and relationship between dwellings, would not be dissimilar to the development approved on the adjacent land to the east.

5.73 The proposed layout has also taken into account the relationship between the proposed dwellings and the residential units provided as part of the barn conversion. For example, the surrounding proposed dwellings are positioned such they generally face side onto this barn conversion, with the proposed dwellings located to the east being separated by parking spaces.

5.74 The proposed layout has therefore been carefully and sensitively considered so as not to cause harm, such as in terms of loss of privacy or general amenities, to the neighbouring properties. Therefore, we are confident that privacy and amenity would be safeguarded in any final detailed scheme.

Planning Obligations

5.75 Policy GP3 states that the Council will, where necessary, seek developers to enter into Planning Obligations (or Section 106 Agreements) or to contribute to the Community Infrastructure Levy (not yet available) to secure contributions to fund improvements to infrastructure, community facilities and other services to meet requirements arising from new developments. Schemes will be assessed on a case by case basis.

5.76 The applicant is prepared to make appropriate contributions in respect of affordable housing provision on site and possibly a financial contribution towards open space/recreation provision (indicated to be £10,000 admin/maintenance fee and £2,463 per plot in the Council's SPG), where the threshold is set at developments of 5 dwellings or more. This can be secured via an appropriate legal agreement.

6.0 SUMMARY/CONCLUSIONS

6.1 This outline application proposal seeks to establish the principle of residential development of an area of land on the northern side of Spring Gardens, Whitland. The application is submitted in outline form, with only highway safety to be considered at this stage.

6.2 The site remains within the defined Settlement Boundary limits and remains allocated for residential development in the adopted LDP 2014, being the subject of two housing site allocations. The application site is therefore suitable for residential development.

6.3 The vehicular access arrangements have previously been considered acceptable by the Council, which was designed to serve an estate development of houses on the land. There is clear evidence on the ground that this access has been implemented and which provides access to the residential barn conversion on the land.

6.4 The adopted LDP 2014 is currently under review by the County Council. As part of that review, many of the housing site allocations (including those which affect the application site) are proposed to be deleted from the Plan. However, we believe that greater weight should still be afforded to the currently adopted Plan.

6.5. We have presented material arguments as part this submission why the land should be considered appropriate for residential development. Upon the implementation of the housing development on the adjacent land to the east, the site would be surrounded on three sides by residential development and would be well related to the settlement of Whitland.

6.6 The proposal would contribute significantly towards the housing needs of the area and would provide an affordable housing element of 30%, in accordance with adopted policy.

6.7 We believe that the scale, density, form and layout of development to be acceptable and which respects its edge of settlement location. It shows that the site can be developed in a satisfactory manner whilst respecting neighbouring residential amenity, the street scene, natural site features, existing trees and the wider landscape setting.

6.8 The proposal is considered to represent a sustainable form of development and would be in accordance with the overall housing strategy of the adopted LDP 2014.

6.9 We believe to have significant planning merit and would be in accordance with both national policy and the relevant policies of the local Development Plan for the area.

If any further information is required or alternative options/solutions need to be discussed, please do not hesitate to contact Hayston Developments & Planning Ltd.

REPORT PREPARED BY
PAUL HARDWICK BSc (Hons) MRTPI
SENIOR PLANNER

REPORT REVIEWED BY
ANDREW VAUGHAN-HARRIES BSc (HONS) Dip TP MRTPI
DIRECTOR/PRINCIPAL PLANNER



RTPI

mediation of space · making of place

Appendices