

Carmarthenshire Revised Local 2018-2033 Development Plan

February 2018

Site Assessment
Methodology

1. INTRODUCTION

- 1.1 This document sets out the methodology for evaluating the suitability of potential development sites for inclusion in the revised Carmarthenshire Local Development Plan (LDP).
- 1.2 In doing so, it identifies the guiding principles for reviewing land previously allocated in the current Local Development Plan (adopted December 2014), and for establishing potential new site allocations and development limit changes, consistent with national planning policy, the LDP Vision and strategic options and the LDP Preferred Strategy.
- 1.3 Sites for consideration include those on the Candidate Site Register, sites allocated but undeveloped within the LDP, and any other sites considered appropriate.
- 1.4 This document will be used as part of the evidence base to support the Authority's approach towards identifying those sites included within the revised LDP, in addition to those omitted from the Plan.
- 1.5 The methodology is prepared to reflect National Planning Policy and legislative provisions to ensure that the identification of sites is founded on a robust and credible assessment of the suitability and availability of land. The deliverability of sites will be an important aspect of the methodology and will be essential in the identification of sites for inclusion within the revised LDP.
- 1.6 All these factors will, where appropriate, be addressed through consultation with specific consultation bodies during the evaluation of sites, whilst promoters of land will be required to provide an appropriate level of detail to allow a full consideration of their sites.
- 1.7 This methodology will form the basis for the consideration of sites throughout the preparatory process of the revised LDP. It will however be subject to ongoing iteration to provide further information in relation to requirements and specific considerations at subsequent stages. In this respect the following provides further clarity on the candidate site stage.

Candidate Sites

- 1.8 The Local Development Plan Manual – Edition 2 (August 2015) advises that early engagement should take place with developers and landowners to obtain information on candidate sites. It is vital that promoters of sites appreciate that bringing them forward after the candidate site stage will mean that it is unlikely they can be considered for inclusion in the Deposit version of the Plan.
- 1.9 The submission of sites at the candidate site stage should not be interpreted as a commitment that they will be included within the Plan. To be considered they will need to meet a criteria-based assessment as set out in this Methodology Paper. It should be noted that the invitation for candidate site submissions will be undertaken over a set period of time, as specified within the Delivery Agreement, and is supported by stakeholder engagement leading up to this stage. Any sites which are submitted outside this time period for the invitation of sites will be deemed as 'not-duly made'.
- 1.10 It should be noted that sites submitted as part of the candidate site process will be made available for public viewing as part of the Pre-deposit Preferred Strategy. However, the assessment to support the inclusion or exclusion of the sites within the

LDP will be considered at the revised Deposit LDP stage, when interested parties will have the opportunity to comment.

2. SITE ASSESSMENT METHODOLOGY

- 2.1 This methodology aims to provide framework for the comprehensive appraisal of the development potential of sites. It is however noted that this cannot replicate the detail considerations required through a planning application. Rather, it is designed and intended to provide confidence around the acceptability and deliverability of sites for inclusion within the Development Plan.
- 2.2 The LDP stages for landowners, agents and developers to get involved are highlighted below in chronological order:
- The invitation to allow promoters of land to submit sites for inclusion within the revised Local Development Plan. Such submissions may include a range of uses including: residential, employment, retail etc. The invitation also includes potential to submit sites to safeguard from development.

Preferred Strategy stage

- The strategic sites are published for consultation within the revised Preferred Strategy. Such sites will be selected to reflect their contribution to the delivery of the LDP Strategy.
- The register of candidate sites is published with the Preferred Strategy. At the Preferred Strategy stage, it is not a consultation to support or object to site submissions.

Deposit LDP

- The Deposit LDP will indicate those sites which are both included and excluded from the Plan. This includes sites allocated for a particular land use as well as those areas protected and safeguarded, in addition to the drawing of development limits around settlements. Representations may be submitted as part of the Deposit LDP consultation process. Representations, including those on sites submitted during this stage will be presented for consideration at the Examination as below.

LDP Examination

- The Deposit LDP, the Pre-Deposit documents, along with all the responses submitted as part of every consultation stage will be submitted for examination to be considered by an independent Planning Inspector. It should be noted that comments and representations submitted during Pre-Deposit stages will not be for consideration at the Examination.

3. THE CANDIDATE SITE PROCESS

3.1 The candidate site submission form sets out the questions necessary to fulfil the requirements of the methodology. This will allow an assessment of the site and its deliverability to take place. The Site Assessment Methodology for the Candidate Site Stage will include criteria to filter sites out where they may be contrary to National Policy, or unsuitable due to overarching constraints. A landowner or developers commitment to the delivery of the site, and additional supporting evidence including the potential viability of a site will be important factors. This will be drawn out from the submission form.

3.2 There is a requirement to undertake a Sustainability Appraisal (SA) as well as a Strategic Environmental Assessment (SEA) as part of the preparation of the LDP. It is intended that the SA process will be combined with the requirements for an SEA into a single appraisal process (SA/SEA). The Council will also need to create a LDP that will have no significant effect (alone and in-combination) on the European Sites resource (Habitats Regulations Assessment - HRA) during its implementation. In this regard, those emerging proposals (including site selection) will need to be informed by an iterative review against such frameworks as the plan making process proceeds towards deposit.

Candidate Site Stage

3.3 In conjunction with the invitation for candidate sites, the Authority will re-evaluate and where appropriate consider the sites which are allocated for such uses within the existing Local Development Plan. Development sites which may have planning permission (outline or detailed) will not necessarily be carried forward as allocations in the revised Plan. Consideration will be given to the commitment of the landowner/developer, as well as the viability and other informing factors for bringing that site forward. Landowners who have current allocations that are undeveloped (irrespective of planning status), should re-submit these as candidate sites during this period.

3.4 Reference should be drawn to the population and household projections for Carmarthenshire and the proposed reduction in the household requirements. It is clear in certain instances there will be sites submitted as part of the candidate site process which may be suitable, however they may be omitted simply on the grounds of appropriate land elsewhere, which has been supported by robust evidence of their deliverability.

3.5 The potential implications arising from any revision to the LDP Strategy and settlement framework will also have an impact on site selection. In this respect, the role and function of the settlement, along with its position within the settlement framework will have a direct bearing on the selection of sites.

3.6 Each candidate site will be subject to an assessment process identified in the chapter below, and in each instance, the type of use being proposed needs to be made clear.

3.7 The format of the methodology follows the detail requested within the candidate site submission form.

Assessment of Strategic Sites

3.8 The Council will assess the deliverability of sites for strategic delivery against the criteria set out in Appendix 1. The sites will be published for consultation within the revised Preferred Strategy. Regard will be given to the emerging SA/SEA framework, and the HRA initial screening with a view to reviewing any effects at pre-deposit stage.

Assessment of Non-Strategic Sites

3.9 There are 2 phases to the non-strategic sites assessment as set out below.

- Phase 1 will assess those sites that would contribute towards meeting the LDP objectives, including those for housing, employment land allocations and other land uses which are annotated within the LDP Proposals Maps.
- Phase 2 - In relation to those sites that proceed through Phase 1 and are to be included within the Deposit LDP stage, the Council will ensure that they are reviewed against the SA/SEA framework and potentially the HRA.

3.10 It should be noted that the sieving process outlined below reflects a number of established sustainability principles and represents an important mechanism in screening sites in advance of any formal assessment through phase 2.

PHASE 1

3.11 The LDP Manual (edition 2) states that “to avoid unduly raising expectations of development in totally unsuitable locations” the Council should publish a clear public statement indicating the types of location which would be judged to be sustainable.

3.12 The settlement framework will seek to guide future development within the County, while at the same time affording the necessary protection to the environment. In particular, the Authority considers that new housing proposals should be directed to settlements where they will lend support to services and facilities and promote the Plan’s sustainable objectives. As part of this methodology, the candidate site submission form seeks to guide promoters of land to submit the following information.

Site Details

1. Location

Site submissions should identify on an OS map as to the location of the proposed site.

2. Site Area

Site submissions should identify the area of the proposed site.

3. Is the site within, immediately adjoining, or closely linked to an identified settlement in the adopted LDP? If so, please identify the settlement from the drop down list.

The development limits as defined within the LDP should be used for this exercise. Sites immediately adjoining the settlements are defined as those which have a direct link to the existing development limits. Sites situated outside the development limits of any settlement and which are divorced from and unrelated to any settlement will not be taken forward to the next stage of the sieving process.

For sites which are divorced from the settlement, but provide a physical or environmental character / visual link to the settlement may be accepted in exceptional circumstances. Candidate site submissions divorced from settlements must provide exceptional reasons for the site to be brought forward.

4. What is the current use of the site?

The candidate site submission should identify the current land use of the site. This includes land uses such as housing, retail, employment, agriculture etc.

5. Are there any buildings on the site?

The candidate site submission should identify if there are any buildings on the site which may be demolished, or utilised as part of a new development. If the proposal does involve buildings on the site, a supporting statement is required to understand how these buildings may, or may not impact on your proposal.

6. What is the proposed use of the site?

The candidate site submission should identify the proposed land use of the site. This includes land uses such as housing, retail, employment, mixed use, tourism or retention of current use etc.

Site Ownership**7. Does the proposer own the site?**

Proponents of land must indicate if they own the site which they are proposing. This is to identify the potential success of delivering the site.

8. Does the proposer own or control any adjoining land?

Proposers of land must identify any adjoining land which they own or control. Proposers should explain their interest, and provide an up to date plan of the site, with the site edged in blue.

9. Is the candidate site an allocation in the current LDP, and has progress been made on its delivery?

Proposers of land should provide details of any progress being made on the site. This will support the submission to show that there is intent and capability to develop the site. If the site has not been developed then proposers of land should indicate the reasons for non-deliverability.

Deliverability**10. Is the proposal for the site to be a housing allocation or to support small scale development? Small scale development includes amendments to the development limits.**

Whilst not placing an arbitrary site size to determine the difference between that considered for a housing allocation or a small site inclusion, submissions of sites should identify the form that the development is looking to take. This will allow the Local Authority to recognise the applicant's intentions for the site, and to allow the consideration of the development strategy for each settlement. This is considered as part of the Candidate site questionnaire form.

Sites not capable of accommodating 5 or more houses will be appraised as part of the review of development limits and against those general planning principles highlighted within this methodology.

11. If the site is to be considered as a housing allocation 5+ units, please specify how the site will be delivered.

- Promoters of land should provide a supporting statement to identify the site's characteristics. Whilst this list is not exhaustive, it should consider factors such as the character of the area, its impact on the amenity of neighbouring uses, accessibility to services and facilities, the topography of the site etc. – all of which would support the inclusion of a site.
- Promoters of land should submit a broad indicative layout accompanied by supporting information to allow the Local Planning Authority to understand the manner in which

the site is proposed to be developed. Please note that this indicative layout does not need to be to scale.

- The submission should also consider the general planning principles considered within the Site Assessment Methodology.
- Promoters of land should include a supporting statement which identifies the site's potential infrastructure connections to the wider framework, e.g. sewerage, electricity and water connections.

12. For small scale development (sites of less than 5 units), please provide the following supporting information.

- Promoters of land should provide a supporting statement to identify the site's characteristics. Whilst this list is not exhaustive, it should consider the general planning principles considered within the Site Assessment Methodology. The supporting statement should include any pertinent information such as topography, boundary treatments, ecology, access etc.
- Promoters of land should submit a broad indicative layout accompanied by supporting information to allow the Local Planning Authority to understand the manner in which the site is proposed to be developed. Please note that this indicative layout does not need to be to scale.
- Promoters of land should include a supporting statement which identifies the site's potential infrastructure connections to the wider framework e.g. sewerage, electricity and water connections.

Non- residential Use

13. How will the site be developed for its intended use?

Promoters of land should submit sufficient information in order for the local authority to determine the applicant's intentions.

- The submission should consider the general planning principles highlighted within the Methodology, in addition to identifying the site's characteristics and any pertinent information such as topography, boundary treatments, ecology, access etc.
- Promoters of land should include a supporting statement which identifies the site's potential infrastructure connections to the wider framework e.g. sewerage, electricity and water connections.

Viability

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

15. What would be the land value of the site if the proposed achievable?

Promoters of land should state the intended timescale for development of the site. This will allow the Local Planning Authority to identify the appropriate level of land supply through the LDP period. In respect of land values, proposers of land should consider the value of their site that they believe could be achieved if it was allocated for the use being proposed. Consideration should be given to the site's location, surrounding land values, the type of development being considered and any abnormal costs which may impact on its value.

Accessibility

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

A key consideration in recognising an appropriate site is whether it has an available access point with sufficient visibility. Site submissions should identify the location of the access point for the development, and how it integrates with the remainder of the site. Evidence should be submitted to express if any works are required to create adequate visibility, and if so, the mechanisms required to achieve it. This detail will be required for both small scale developments and housing allocations.

Environment, Infrastructure and Utilities

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

In the first instance, the Council will not consider any highly vulnerable development sites which fall within C1 and C2 flood risk zones as delineated by TAN 15 flood maps.

If a site is located within a flood risk zone, it will be a matter for the landowner to provide the appropriate evidence to NRW to demonstrate to their satisfaction that the site is not subject to the identified flood risk. The Council will only consider these sites which have as a result of the evidence provided been omitted from the flood risk zones as delineated with the TAN15 Development Advice Maps. To be considered, these sites will need to be omitted from the flood maps in advance of the preparation of the Deposit LDP.

18. Are there any infrastructure or other site constraints or other issues on the site that would affect its deliverability during the Plan period?

The submission should include details of the availability of water connections to the site, in addition to the method of foul sewage disposal from the site. Site constraints such as the siting of trees or hedgerows will need to be considered as part of the methodology. Any impacts will need to be addressed or mitigated against.

19. Are there any historic, archaeological, landscape or ecological features / designations, or protected species which may be impacted upon by the development of the site?

Candidate sites which have significant biodiversity issues should be considered against the checklist set out in Chapter 10 of the Nature Conservation and Biodiversity Supplementary Planning Guidance. If there are any biodiversity issues then submissions should consider how the impact could be mitigated.

Secondly, proposers of land should identify if the development would negatively affect historic or archaeological features and designations. If so, please provide supporting information and explain how features within the site could be retained or enhanced.

4. FURTHER ANALYSIS AND CONSIDERATIONS

4.1 The determination of a development proposal will be supplemented by a wider appreciation of planning policy, including general planning principles. These include those relating to ribbon development, back land and tandem development for example.

4.2 Such general planning principles can often be qualitative issues and will be considered as part of a site's appraisal. These will be considered based on the site's individual characteristics, its impact on the character of the area, in addition to its location within the settlement. Other site constraints which may impact upon the site selection process, or indeed the sites deliverability will be considered as part of the selection process. These may include issues of land stability, mineral safeguarding, mineral buffer zones, agricultural land quality and sites of cultural importance.

4.3 Where appropriate, the Council may request further information from promoters of land.

4.4 As with the Strategic Sites, this assessment may require additional information to be provided by internal departments such as drainage, highways and education as well as external consultation with statutory agencies and organisations where appropriate (see Technical Liaison below).

CONSIDERATION OF NON-RESIDENTIAL SITES

4.5 The allocation of non-residential sites submitted as part of the candidate site methodology will be considered against the planning principles identified within the preceding paragraphs. In addition, reference will need to be drawn to any evidential documents and topical background papers which identify the requirements of such land uses.

TECHNICAL LIAISON

4.6 The Council will undertake liaison with technical and other officers of the Authority and external parties (incl. Natural Resources Wales, Dwr Cymru Welsh Water and the Dyfed Archaeological Trust) to assist and contribute to the plan-making process. This will assist in the screening or consideration of potential sites for inclusion, or otherwise within the LDP.

PHASE 2 SA/SEA (and potentially HRA) APPRAISAL

4.7 In relation to the Deposit LDP stage, regard will be required to the SA/SEA. The Council's SA/SEA framework will be established by this stage. The Council will ensure that its proposals (including sites) as set out within the Deposit LDP will be subject to review against the SA-SEA framework. Subsequent iterations of this methodology will identify further detail in relation to process and its requirements.

4.8 In relation to the HRA, it will be matter for the Council to produce a Plan that will have no significant effect (alone and in-combination) on the European Sites resource. In this regard, the Council will ensure that its proposals (including sites) as set out within the Deposit LDP will be subject to review against the HRA Report (should the initial pre deposit Screening fail to conclude that there is no potential effect).

Further Information

4.9 For further assistance on the Site Assessment Methodology process or the LDP process in general please see our website (see links to Planning and Policy) or email forward.planning@carmarthenshire.gov.uk or contact the Forward Planning Section on 01267 228818.

APPENDIX 1 - ASSESSMENT OF STRATEGIC SITES

5. Introduction

5.1 This appendix will iteratively evolve as the pre-deposit Preferred Strategy develops. At this stage, it will be difficult to go into significant detail given that the Preferred Strategy has yet to be compiled. The appendix will be updated to reflect the context of the Preferred Strategy in due course. At this stage (January 2018) this appendix sets out some of those thematic considerations and corporate priorities which may inform future deliberations and Plan making.

5.2 The Swansea Bay City Deal sets out a transformational approach to how the region will deliver the scale and nature of investment needed to support the area's plans for growth. Whilst the County will benefit from all of the City Deal proposals, the following projects are being specifically lead by Carmarthenshire:

- Life Science and Wellbeing Village - Llanelli;
- Skills and Talent initiative and;
- Creative Digital Cluster – Yr Egin – Carmarthen.

5.3 The City Deal will invest £1.3bn into the Swansea Bay City Region. The Deal consists of £241m of central government funding to be split between the two governments. Some £360m of other public sector funding and £673m of private sector contributions will make up the total investment package.

5.4 At a local level, the announcement of Transformations: A Strategic Regeneration Plan for Carmarthenshire – 2015-2030 by Cllr Emlyn Dole, Leader of Carmarthenshire County Council, provides a 'game changing' opportunity to capture opportunities for growth and investment. It aims to boost the local economy and create 5,000 jobs across the County by 2030.

5.5 In noting the above thematic and corporate context, the following seeks to set some parameters to inform a site's potential strategic contribution:

1. Is the Site Strategic?

5.6 The Council will consider sites which are considered appropriate as being of potential strategic significance to the LDP. Such considerations may include the scale and nature of development (whether individual or a number of related sites with cumulative importance), its location, and proposed use.

2. Strategic Consideration - Would development of the site be essential to the implementation of the planning and regeneration proposals of the Council and meet the strategic, sustainable objectives of the Strategy?

5.7 Although specifying a size limit will be too prescriptive, it is likely that strategic sites will have significant impacts and support the implementation of the Plan.

5.8 The identification of strategic sites is subject to analysis as part of the preparation of the Preferred Strategy.

5.9 Further analysis of a Strategic Site will be carried out in accordance with the provisions set out within Site Assessment Methodology, with the following aspects being notable considerations:

- **Environmental impact** – Opportunity for an initial review against the emerging SA/SEA framework and initial HRA screening;
- **Physical site constraints** – Is the site located within a flood risk zone as identified in the TAN 15 Development Advice Maps?
- **Infrastructure issues** – Are there any infrastructure capacity issues that cannot be mitigated against?
- **Site deliverability** – is the site likely to be developed during the revised LDP period?
- **Appraisal in respect of LDP Strategic Objectives**

5.10 Other site constraints which may impact upon the site selection, or indeed the sites deliverability, will be considered as part of the selection process. These may include issues of land stability, mineral safeguarding, buffer zones, agricultural land quality and sites of cultural importance.

5.11 Additional information may be sought on these strategic sites, including information from other Council departments, infrastructure and utility companies and also developers and landowners to assist in the assessment process, particularly in identifying the sites' deliverability.

5.12 The contribution of a strategic site in terms of providing opportunities for higher building standards represents an important consideration. Policies or provision informing the application of standards (including the potential for master planning / development briefs) will be developed. Such policies or provisions will be utilised to inform the identification of such potential and ensure that its viability and deliverability is duly considered.

5.13 In certain instances, sites of a strategic nature might be located outside of settlements in the open countryside. In such cases the scale and nature of the proposal should be assessed in respect of its appropriateness to the location. Proposals that might have a positive strategic impact, for example in terms of raising the prosperity of the area through employment and inward investment, would be considered in exceptional circumstances. These proposed sites will need to be thoroughly assessed against national and local planning policies. Such sites would not however be considered as strategic for the purposes of this exercise.