

A LARGER LLANDOVERY

WHERE SHOULD 148 NEW HOMES BE BUILT?

[A problem with the Local Development Plan]



prepared jointly by:



Llandoverly Area Tenants and
Residents Association



The Calon Cymru Network CIC

INTRODUCTION

Llandovery is the service centre for the upper Tywi valley region. The town is suffering from population decline, which has led to the closure of the comprehensive school. The town is too important to its region to be allowed to decay further.

Llandovery needs more people, especially people who will contribute to the local economy. So new housing is needed. But new development must fit in and should not damage the town's character.

Our proposals show how to achieve these objectives.

In the new LDP, which will shortly replace the current UDP, it is proposed that all new housing in the town is sited behind and opposite Dan y Crug, at the eastern end of the town. We believe this is a serious mistake, which could have disastrous consequences for Llandovery.

This document is in two parts: Firstly, we explain our reasoned objections to the above proposal. Then we describe our ideas for a different, better way of allocating housing land, paying more attention to:

- Flood protection
- Greenhouse gas emissions reduction
- Social integration
- Economic vitality
- Biodiversity

Through the arguments set out in this document we hope to persuade all parties to agree to our proposed changes to the housing land allocations in the Deposit LDP.

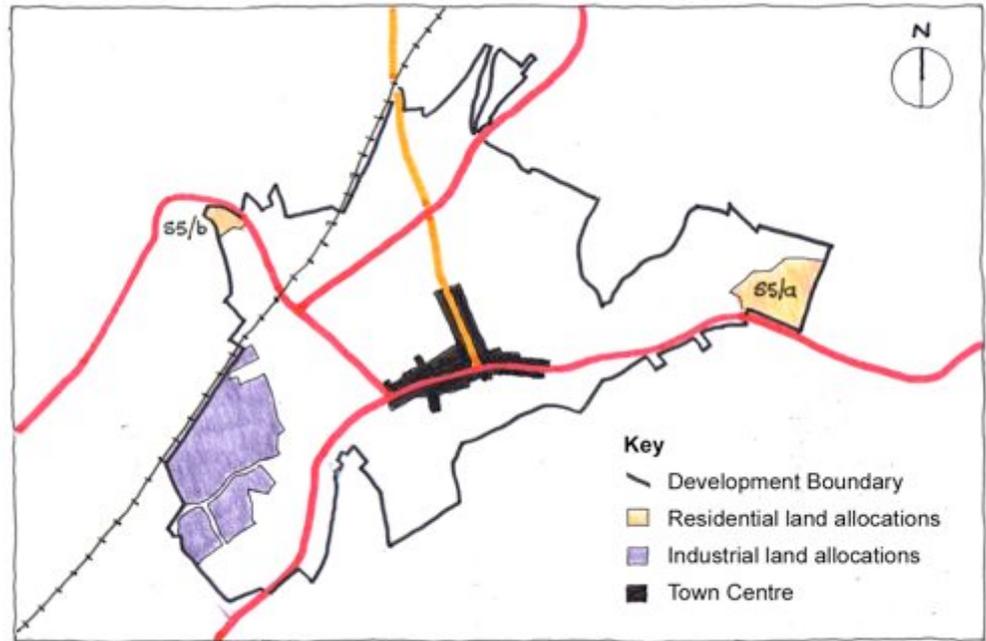
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PART 1. OBJECTIONS TO THE PROPOSED ALLOCATION

Background

The current Unitary Development Plan [UDP] has two sites specifically allocated for housing [Plan 1].

Plan 1. LLANDOVERY: UDP MAP 2001 – 2016



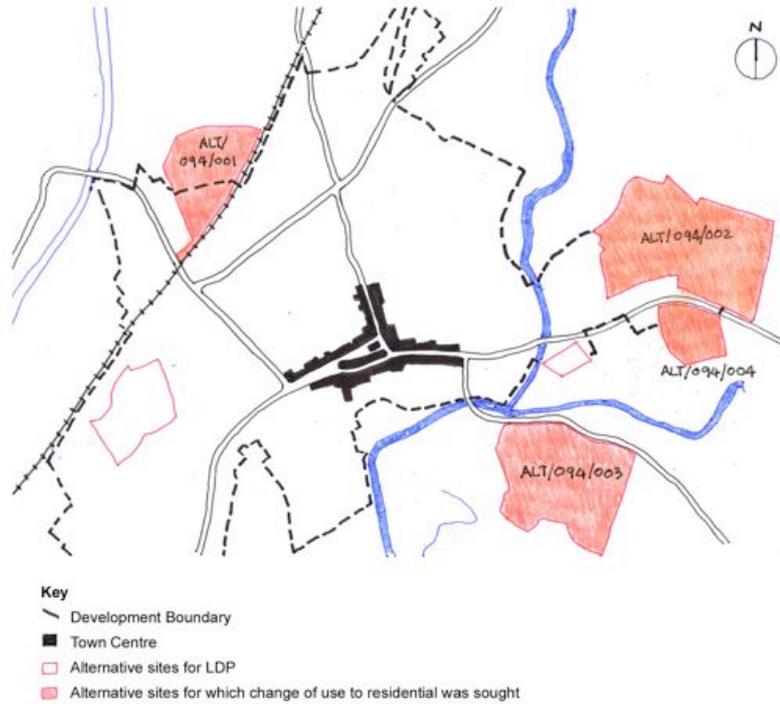
Carmarthenshire County Council is now preparing its Local Development Plan [LDP], which will control what goes where in Llandovery until 2021. The Welsh Government required Carmarthenshire County Council [LPA] to find land for 10,720 homes to be built between 2006 and 2021. The LPA opted to allocate 11.3% of this requirement, land for 1,211 homes, to six service centres, one of which is Llandovery. A mathematical weighting process was then used, resulting in a need for Llandovery to provide land for 148 homes.

So this allocation is a proportional share of the housing land which the Welsh Government [WG] required the LPA to find, and is not related to identified need within Llandovery.

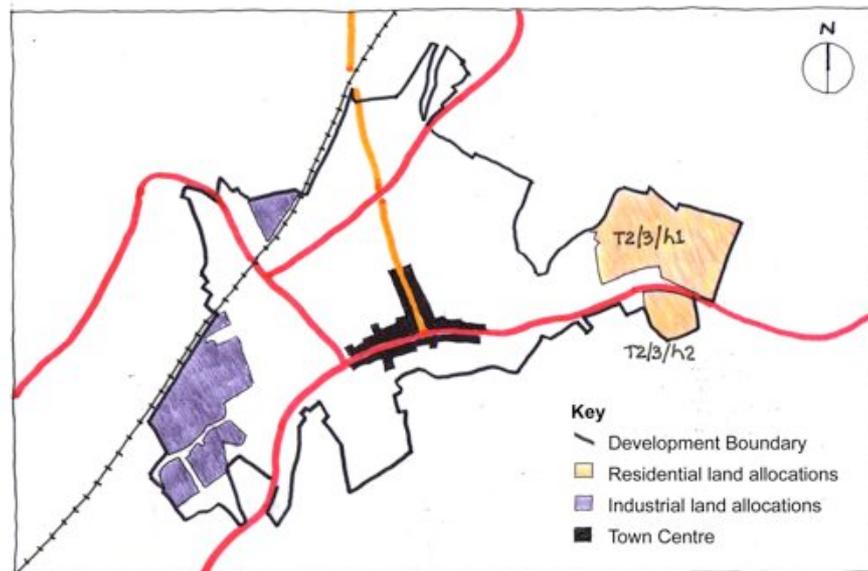
In deciding on the distribution of the new housing land in Llandovery the LPA looked at possible candidate sites [Plan 2] within and adjacent to the development boundary and initially chose just one site on the Brecon Road on the eastern end of town.

As this site was considered to have a capacity of just 120 units, an adjacent parcel of land not previously submitted as a candidate site for the Deposit UDP was included, adding a further 28 units. Consequently the entire allocation of 148 units is contained in a single tract. This was the decision of the LPA. [Plan 3].

Plan 2. LLANDOVERY: LDP (Alternative sites)



Plan 3. LLANDOVERY: Deposit LDP



Of the alternative sites considered, only ALT/094/002 and ALT/094/004 have been included in the Deposit LDP for residential land use and given the reference nos. T2/3/h1 and T2/3/h2. The development boundary was altered accordingly.

The small residential allocation S5/6 in the UDP has been omitted in the Deposit LDP as it is within the C2 flood zone.

The section of alternative site ALT/094/001 that lies within the development boundary has been allocated as industrial land.

The main effect of the changes from the UDP is the increase in the land allocated for housing and the number of units, from about 40 to 148. All of the residential allocation is concentrated in the one area on the Brecon Road.

We believe that Llandovery's population must grow. The town needs more working families to maintain the town's social and economic vitality, and so it needs to increase its stock of homes suitable for households of all types.

However, to allocate one tract of land for 148 homes in order to fulfil Carmarthenshire's quota is solely the outcome of a numerical exercise – it is not integrated town planning. It may be that the 148 new households are what Llandovery needs. But all in one large lump.... in a poor location...in a town that is losing its secondary school?

Great care must be taken in planning and designing the new development to ensure that such a large increase can be integrated into the existing community, physically and socially.

So it is not the size of the allocation we are challenging – although the data from which it was calculated dates back to the 2001 census and the town has changed dramatically in the last 12 years. We are objecting to the proposed siting of the entire allocation on a single large tract on the Brecon Road and to the building of 148 suburban-density homes on that land.

A development of this size and character would have damaging consequences for neighbouring areas and for the town as a whole. However, the site could be part of a more dispersed pattern of new housing for the town, as we demonstrate in part 2.

The problem of flood risk

The LPA forward planning process decides on possible, not actual, outcomes. The County Council no longer builds homes. This activity is left to the private sector and to housing associations – which have avoided Llandovery because of the flood risks from the converging Bran, Gwyderrig and Tywi rivers.

The last major flood was in 1998. Since then flood alleviation works have been carried out on the river Bran – but climate change will result in more intense weather events, including torrential downpours¹ Therefore it is vital to retain porous land surfaces which slow the rate of run-off and reduce the risk of flash floods.

For Llandovery this is critically important to the east of the town where overflow from the Bran and Gwydderig rivers would escape into the town centre.

The proposed allocation sites, [the Brecon Road land], lie on clay soils between the Bran and Gwydderig rivers. More than a third of the larger site, T2/3/h1, lies within the C2 flood zone identified by the Environment Agency as *'having a high risk of flooding and without significant flood defence infrastructure'*. About 10% of this site is within the even higher-risk C3 zone.

The layout for the scheme submitted for planning consent, E/26681 [plan 4] avoids most of the C2/C3 flood zone which covers a large part of the site T2/3/h1 but does not take into account the surface water drainage problems in the area.

Serious flooding is not only caused by rivers rising. It also occurs frequently when heavy or prolonged rain falling on higher ground runs down rapidly to the lower levels, especially where soil has been compacted and/or urban development has increased the area covered by impermeable surfaces.

This would be the problem for nearby Dan y Crug and Dolau Bran, as well as for the development itself, if it is built as proposed. The steep slopes of Y Crug, a short distance to the east, drain down across the proposed development site and the flat water-meadows to the River Bran. The clayey soil does not absorb water readily and a substantial increase in hard surfaces close to Dan y Crug would make the existing homes much more vulnerable to flooding.²

This has happened with devastating consequences in several other locations in 2012.



This layout plan shows that planning consent is being sought for 76 dwellings but the total allocated capacity for this site in the Deposit LDP is 120. No planning application has been submitted for the development of the adjacent site T2/3/h2

Social and economic problems – who will occupy the new homes?

The LDP housing allocation does not make a distinction between the demand for open-market homes and the need for social housing. The assumption is that there will be a mix on this estate. But who are the homes for?

Llandovery is a market town in decline. The state secondary school, Ysgol Gyfun Pantycelyn, will close in 2015, despite overwhelming opposition from the people of the town. The local authority stated that falling pupil numbers left it with no alternative.

The town's decline is accelerated by the closure of HSBC bank, the Trade Secret clothing shop in its prominent location adjacent to the Castle Hotel, and the closure of the Royal Mail sorting office. There is also a rising incidence of empty shops, and the closure of local businesses, even before the secondary school has closed.

So, given this worrying trend, who are the potential buyers and renters of 148 new homes? Not families with children, because of the impending school closure, nor people who need stable local employment, as there are few jobs. And retirees on reasonable pensions are unlikely to want to live in a large new estate on a floodplain outside the town.

Commuters working in distant locations may be interested, but not if they have children at or nearing secondary school age. And some local families may move from other parts of the town. However, it is likely that social landlords would play a part and that substantial numbers of newcomer renters would be housed on the estate and then experience difficulty in finding regular work.

There is a real danger that a single large development in this location, in an economically troubled town, could become a convenient ‘overspill’ opportunity. This has happened in many towns already – the result of well-meaning but ill-considered social planning policies. The Gurnos estate in Merthyr Tydfil is a typical example of how this approach has failed.

Llandovery is too small a town for a large number of newcomers arriving in a short period to be integrated easily. The town has a strong cultural and linguistic heritage, which could be diluted considerably. In addition there are very few employment opportunities. Incoming social housing tenants, many of whom would be dependent on benefits, would find it especially difficult to adjust and integrate into the community – leading to frustration and a sense of alienation that would result in friction and problems for the newcomers and for the town as a whole.

Of course, this outcome cannot be predicted with certainty. It can only be regretted in retrospect as has happened in so many communities throughout the UK. The current Allocation in the Deposit LDP would be a colossal risk.

Llandovery does need a larger population in order to achieve a stable local economy and to support important public services, but it is not simply a question of numbers. It needs to attract young households that will be economically and socially active to rebalance the age profile of the town and restore its vitality.

It should be noted that the death rate in Llandovery electoral ward is 27% higher than the birth rate.³

The threat to the character of Llandovery

In addition to the potentially negative environmental and social impacts described above, the proposed large, modern housing development at the eastern entrance to Llandovery would detract from the historical focus of the townscape improvements currently being organized by the Llandovery Partnership in conjunction with the Prince’s Foundation for Building Community.

Improvements in the town centre designed to protect and enhance the character of this Georgian market town after decades of clumsy infill developments would be at risk if the town cannot retain its unique character.

Approaching from Brecon, the entry is particularly important as it comes at the end of the long winding descent through the scenic Gwedderig valley. It would be a disappointing anticlimax if visitors to the town were to be greeted by a bland suburban housing estate on each side of the road, probably of undistinguished appearance, and no different to those encircling countless other towns.

Tourism has long been one of the main pillars of the local economy and it is likely to remain so, at least while Llandovery can maintain its historic character. The approaches to the town give a first impression to visitors. They are as necessary to its identity as the Georgian town centre.

PART 2. OUR PROPOSAL: AN INTEGRATED PLAN

New housing distributed throughout the town

There are some areas within and immediately adjacent to Llandovery where housing can be built with a low risk of flooding. If new homes on these sites were constructed to the highest environmental standards they would be likely to attract new residents for whom sustainable development is important. Two such sites are of particular interest.

In July 2011, two separate landowners instructed J Evans Planning Ltd to lodge documents with the LPA detailing objections to the selection of the Brecon Road land as the only allocation and identifying potential alternative sites.

The larger of the sites, 6.13ha, at Maes y Felin [plans 5 and 6] does include an area subject to flood risk – about 30% of the land is in the C2 flood zone. However, this flood risk land could be used for amenity purposes and development on the upper part of the site would not cause surface water drainage problems for neighbouring areas. This site is also nearer to the town centre than the Brecon Road land and, according to J Evans Planning Ltd, could accommodate 130 dwellings. We consider that 70 units would be easier to integrate. More details on the planning concept and flood risk area are shown on the plans.

Plan 5. Maes y Felin site [ALT/094/003]: Floodplain constraints



Key

-  Area of site within C2 flood zone
-  Limit of C2 flood zone
-  Site boundary

Plan 6. Maes y Felin site: Conceptual layout plan



The purpose of this plan is to illustrate the broad principles of land-use and landscaping envisaged for the site.

Total area 6.1 ha.

Housing land, 2.2ha, to be developed as neighbourhood of 70 homes of av. 100m² on av. 300m² plots [including contribution to access lanes & parking areas]. Av.house footprint to be 50m². Urban density of 13 homes / gross acre.

Homes of mixed tenure with appropriate quota of affordable units.

Community Land Trusts, Co-operatives and self-builders preferred to volume developers.

All buildings planned for optimum use of passive solar energy and to be of near carbon-neutral standard.

Horticultural land, 2.0ha, for local produce, to increase soil fertility and water retention / percolation. Some allotments linked to neighbourhood, surplus for town in general.

Access from Bridge St. / Myddfai Road.

Access lanes and parking areas of permeable construction [SUDS].

Hedges retained and new wildlife corridors and margins created. Increased tree cover for screening and general amenity purposes.

C2 flood-zone land, 1.9 ha, to be used as park or community garden, and wooded buffer zones.

Public footpath links to town centre, approx. 300m, Allt Dingat etc.

The smaller site of 3.44ha, behind Towy Avenue [see plans 7 and 8], on the western edge of Llandovery, also encroaches on the C2 flood zone but most of it could be developed in a way that would avoid creating risks for neighbouring areas. It is conveniently situated, adjacent to the station on the Heart of Wales railway and also closer to the town centre than the Brecon Road site.

As part of a scheme on this site the old warehouses within the flood zone could be demolished and the site redeveloped with workshops and studios. The entrance could be widened and 40 houses could be constructed on land assessed as not having a flooding risk. If an all-weather track were constructed from this site along the west side of the railway line to the Cilycwm Road an emergency evacuation route could be provided if Tywi Avenue were to be flooded. More information on the planning concept is shown on the plans.

We believe that the Maes y Felin and Tywi Avenue sites, together with a correspondingly reduced site on the Brecon Road, [plans 9 and 10], would be a better way of providing Llandovery with land for the LDP target figure of 148 new homes over a period of 15 years. There are also smaller infill sites that could be developed. Our plans show how sustainable development could be carried out on all three sites.

This distribution of new housing on multiple sites should make integration into the older parts of the town relatively easy, whereas a large peripheral estate is likely to remain peripheral – socially, culturally and economically.

Plan 7. Tywi Ave site [ALT/094/001]: Floodplain constraints



Key

-  Area of site within C2 flood zone
-  Limit of C2 flood zone
-  Site boundary

Plan 8. Tywi Ave site: Conceptual layout plan



The purpose of this land is to illustrate the broad principles of land-use and landscape envisaged for the site.

Total area 3.44 ha [not including allotment land,]

Housing land, 1.3 ha, to be developed as a compact neighbourhood of 40 homes of av. 100m² on av. 300m² plots [including contribution to access lanes & parking areas]. Av. house footprint to be 50m². Urban density of 13 homes / gross acre

Homes of mixed tenure with appropriate quota of affordable units.

Community Land Trusts, Co-operatives and self-builders preferred to volume developers.

All buildings planned for optimum use of passive solar energy and to be of near carbon-neutral standard.

Horticultural land, approx 1.2ha, for local produce, to increase soil fertility and water retention / percolation. Some allotments linked to neighbourhood, surplus for town in general.

Almost the whole of the former depot, 1.2ha, is within the C2 flood zone. It may also have some contamination and require soil remediation. To be developed as a screened complex of small, low-rent workshops and studios for local businesses. This part of the site has been allocated industrial / employment use in the Deposit LDP.

Existing access from Tywi Ave, widened and improved to serve the whole site and extended as stone track to Cilycwm Rd. to act as an evacuation route. Potential for additional access from Tywi Ave near the Chain Bridge.

Access lanes and parking areas of permeable construction [SUDS].

Good links to riverside footpaths. About 350m to town centre.

Integrated, sustainable and safe housing

It is not enough to provide sites for new homes in sustainable locations. The way the developments are planned is equally important. For a sustainable future all the homes must be designed to achieve a zero-carbon or near-zero-carbon standard.

Furthermore, the infrastructure must be low-impact, to accord with the objectives of the Welsh Government for national resource consumption and be no greater than planet Earth can continue to provide for in the future.⁴

Moreover, development layouts should include open land suitable for uses such as community gardens, allotments and orchards. Our conceptual studies of the three sites illustrate these planning principles [plans 6, 8,10]

Convenient, economic, urban housing

It is also important for new housing to be as close as possible to the heart of the town so that its amenities, essential services and public transport links can be accessed easily on foot or by bicycle and do not require the use of a car.

Homes built on land free from flood risk within each of these sites, using local materials and minimising energy demand, should attract new residents whose activities could help arrest the decline of the town and prevent further loss of its services and amenities.

Tourism is likely to remain a principal economic activity and would benefit from a town centre with open cafes, pubs and shops. New housing meets sustainability criteria only if crucial services can be accessed on foot or easily by public transport and the achievement of this objective depends on a holistic approach to planning, sensitive also to linguistic and cultural heritage. Each inaccessible destination imposes longer journeys on its users and higher emissions from motor transport.

Plan 9. BRECON RD. Site [T2/3/ha1: Floodplain constraints



Key

-  Area of site within C2 flood zone
-  Limit of C2 flood zone
-  Site boundary

Plan 10. Brecon Rd. Site: Conceptual layout plan



The purpose of this plan is to illustrate the broad principles of land-use and landscaping envisaged for the site.

Total area 7.94 ha. but only 3.5ha affected by these proposals. The remainder of the site is largely within the C2 flood zone and should remain in agricultural use

Housing land, 1.3ha, to be developed as a woodland neighbourhood of 38 homes with strong links to the adjacent Dan y Crug houses. This is an important site as it marks the eastern entry to the town so the planning and design needs special care as its character will create a first impression for large numbers of visitors.

*Homes to be of av.100m² on av. 300m² plots [including contribution to access lanes & parking areas].
Av.house footprint to be 50m². Urban density of 11 homes / gross acre.*

Homes of mixed tenure with appropriate quota of affordable units.

Community Land Trusts, Co-operatives and self-builders preferred to volume developers.

All buildings planned for optimum use of passive solar energy and to be of near carbon-neutral standard.

Horticultural land, 1.0ha, for local produce, to increase soil fertility and water retention / percolation. Some allotments linked to neighbourhood, surplus for town in general.

Access from Brecon Rd. [A40] with separate, shared access track to allotments.

Access lanes and parking areas of permeable construction [SUDS].

Hedges retained and wide wooded buffer zones for screening and amenity use.

Gypsy Lane provides footpath access to the A483. About 500m to town centre.

CONCLUSION

It is no exaggeration to suggest that the whole social and economic fabric of Llandovery and its satellite villages is in danger of disintegrating, following years of relentless closures of schools, shops, post offices and pubs. The loss of the secondary school is a particularly devastating blow.

The population needs to grow, of that there is no question. The area needs more working households and a healthier balance of age groups. It also needs more affordable, sustainable housing, but it is not just a question of numbers. Building 148 new homes may help the County reach its numerical target but it will not necessarily help Llandovery with its social and economic problems. In fact if all new housing is concentrated in one large, poorly-sited estate simply because it is expedient to do so, it is likely to worsen the town's problems.

In the view of LATRA and the Calon Cymru Network, the three sites described in this document: Brecon Road, Maes y Felin and Tywi Avenue would all contribute to providing Llandovery with the required land for 148 units. This would help in the assimilation of a large population increase over a short period.

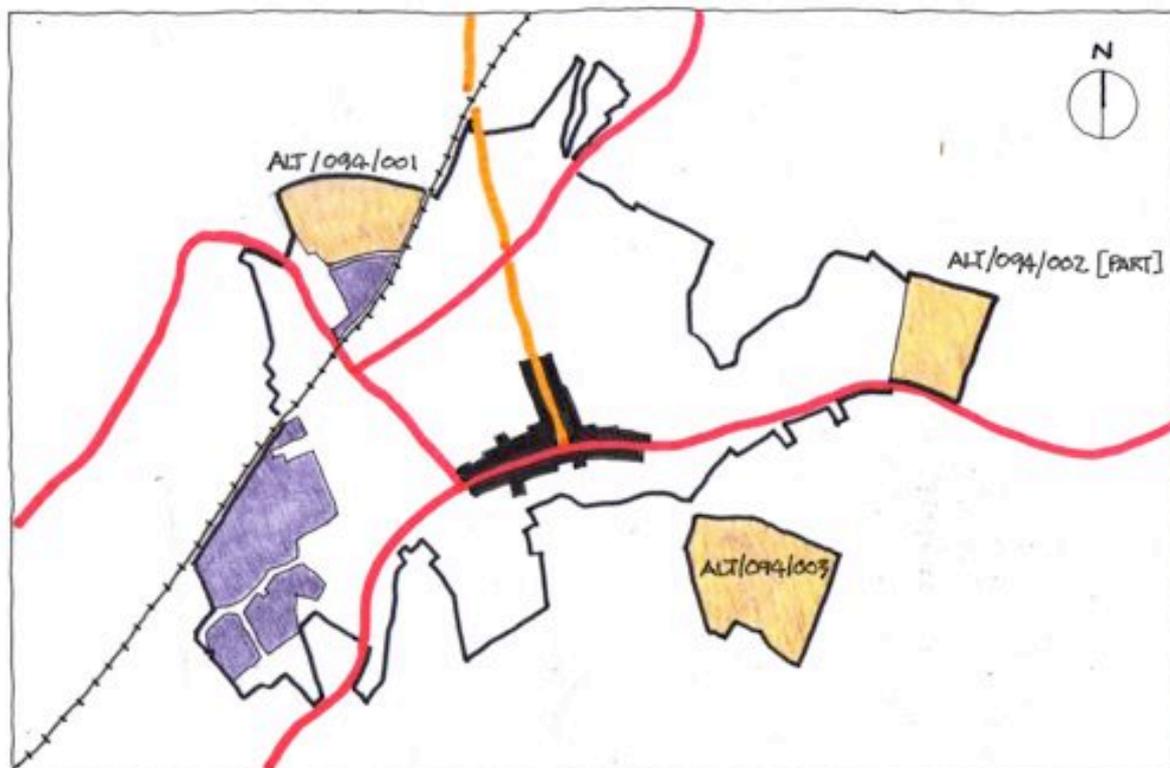
Equally important, the planning and design of what would still be substantial new neighbourhoods must respect the character of the town. An enlargement of this magnitude will mean change but it need not, and should not cause its identity to be swamped.

However, if the current housing land allocation is confirmed in the Adopted LDP, and if planning application E/26681 is approved, a large, anonymous suburban estate will rise on the eastern edge of the town. A development that is likely to add to the vulnerability of the town to flooding can't be said to be sustainable. Indeed it falls far short of most of the standards set out in the Welsh Government's sustainable development scheme, *'One Wales: One Planet.'*

If this disastrous LDP decision stands it will prove to have been a missed opportunity to revive Llandovery's declining fortunes.

We believe strongly that our alternative proposal demonstrates a realistic way to begin addressing the demographic and economic predicament that faces the town. We urge the Welsh Government and Carmarthenshire County Council to give urgent consideration to our proposal and to amend the housing allocation for Llandovery accordingly, before the LDP is examined.

Plan 11. Deposit LDP: Proposed amendments



- Key**
- Development Boundary
 - Residential land allocations
 - Industrial land allocations
 - Town Centre

This map shows the changes we believe should be made to the allocation of residential land

The Brecon Road land:

T2/3/ha1 [Alt/904/002] Allocation to be reduced in size from 7.94ha to approx 3,5ha. Housing capacity of 38 units. Remainder to remain in agricultural use.

T2/3/h2 [ALT/094/004] Allocation removed. Land to remain in agricultural use.

Maes y Felin land:

ALT/094/003 To be allocated residential and related uses. Housing capacity of 70 units.

Tywi Avenue land:

ALT/094/001 to be allocated residential and related uses. Housing capacity of 40 units.

1 'Climate: Observations, Projections and Impacts' from the Meteorological Office's Hadley Centre, 2011, p.2; 'Extreme rainfall in UK 'increasing' by Roger Harrabin, BBC News/Science and environment, January 3rd 2013; UK must prepare for extreme weather and ageing population,' news from Durham University's Institute of Hazard, Risk and Resilience, October 11th, 2013

2 See 'Flooding and Groundwater' for the risk of run-off flooding on clay soils, www.climatechangeandyourhome.org.uk, English Heritage

3 The electoral ward profile published by Carmarthenshire County Council gives birth and death data for 2010.

4 See 'One Wales: One Planet – the sustainable development scheme of the Welsh Assembly Government', published in May 2009. The scheme makes sustainable development, based on using only Wales' fair share of Earth's resources, the overarching strategic aim of all policies and programmes, across all Ministerial portfolios, and the central organising principle of the Welsh Government and the public sector in Wales.