

# PLANNING STATEMENT

**Proposed Residential Development, Vehicular Access and  
Infrastructure**

**Land Adj Dolgwenith & Tan Y Bryn**

**Llanidloes**

**Powys**

**December 2016**

**Our Ref: R095**

**Pre Application Consultation issued February 2017**



**Summary****Proposal**

Outline planning application for residential development, vehicular access and Infrastructure.

**Location**

Land adj. Dolgwenith and Tan- y- Bryn, Llanidloes, Powys

**Date**

December 2016

**Project**

R095

**Client**

Andrew Thomas

**Product of**

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## Executive Summary

- i. This Planning Statement accompanies an outline planning application for residential development, vehicular access and Infrastructure on the land adjacent to Dolgwenith and Tan- y- Bryn, Llanidloes.
- ii. Part of the site lies within the existing settlement boundary in the Powys County Council Unitary Development Plan (PCC UDP) and also in the emerging Powys County Council Local Development Plan 2016-2026 (PCC LDP).
- iii. In terms of the principle of development, the application must be determined in accordance with the development plan, unless material considerations indicate otherwise. There are significant material considerations which weigh heavily in favour of the grant of planning permission.
- iv. The Council only have 2.2 years of housing land supply and Planning Policy Wales Technical Advice Note 1 (PPW TAN 1) states that the need to increase housing land supply should be given 'considerable' weight in the determination in planning application. As the PCC UDP expired on 30<sup>th</sup> June 2016, the Council is now deemed to have **no housing land supply**.
- v. The UDP 2001-16 allocated sites in Llanidloes were capable of accommodating 155 dwellings, however only 57 (37%) have been delivered to date.  
  
The 2016 JHLAS identified capacity for 203 residential units of which 168 (82%) were yet to be delivered.  
  
This has resulted in a **demonstrable under supply of housing** which is forcing up house prices and pricing young couples and young families out of the market.
- vi. The emerging LDP **fails to address the past shortfall** in housing delivery as it identifies insufficient housing land to serve the town and many of the sites that have been identified are subject to serious concerns regarding their deliverability.
- vii. Based on the latest JHLAS, while there are acknowledged housing commitments within the Llanidloes area, these are based on extant planning permissions which show **no real ambition** to deliver much needed housing within the town over the LDP plan period.

- viii. The application proposes 10% affordable housing which is in line with recent viability studies commissioned by PCC as part of its suite of LDP source documents. **Within the town there is continuing significant unmet need and demand for affordable housing.**
- ix. The application site is not subject to any significant constraints and is available for development immediately upon the grant of any subsequent reserved matters application.
- x. For the above reasons, the Statement concludes that planning permission should be granted for the development proposed.

## Introduction

- 1.1 This Planning Statement accompanies a planning application submitted on behalf of Andrew Thomas for outline planning permission for residential development, vehicular access and infrastructure adjacent to Dolgwenith and Tan- y- Bryn, Llanidloes.
- 1.2 This application is submitted in outline will all matters, apart from access, reserved for future consideration.
- 1.3 The application site comprises an existing builder's yard, an existing two storey dwelling and several field parcels at the south eastern edge of the market town of Llanidloes. Currently, part of the site sits within the settlement boundary for Llanidloes within the PCC UDP and PCC LDP. The remainder sits astride the settlement boundary to both of these development plans. It is interesting to note that historically the site **was included as one whole land parcel** for residential development within the Montgomeryshire Local Plan, October 1995 (MLP) as per Appendix 1.
- 1.4 The application is submitted in response to the current absence of a 5-year housing land supply in Powys and a need to deliver housing in the short to medium term, practically to meet affordable housing requirements.
- 1.5 The planning application comprises the following set of drawings

Drawings title	Drawings No.	Prepared by
Proposed Site Layout	R095 1.0.02 Rev B	DHA

- 1.6 In addition, the application is accompanied by the following supporting documents:

Document Title	Document Ref / Date	Prepared by
Design and Access	Document to follow	DHA
Arboricultural Report	Document to follow	Future Arbor
Landscape & Visual Appraisal	Document to follow	Lingard Styles
Ecological Assessment	November 2016	Mid Wales Ecology Ecological Consultants
Transport Statement	Document to follow	Entran
Topographical Survey	December 2016	Invar Mapping
Drainage Report	Document to follow	CES

- 1.7 The purpose of this Planning Statement is to provide additional and complementary information to the planning submission.

## **Site Description**

### **General location and context**

- 2.1 The application site lies at the south-eastern edge of the historic market town of Llanidloes
- 2.2 Llanidloes is a town and electoral ward in the County of Powys, situated within the historic boundary of Montgomeryshire in Mid Wales. The town is acknowledged to be the first town on the River Severn. The town serves a large outline agricultural community and was historically the focus for the wool and textile industries. This early role evolved with the manufacture of mining and other machinery, which widened its economic base further and maintained the central position of the town in relation to the surrounding villages. Today with its full range of community services and facilities, Llanidloes has a wide focus for a hinterland of large and small villages. In the latest census the town had a population of 2,929.

### **The Site**

- 2.3 The application site comprises a builder's yard, a dwelling and its curtilage as well as several agricultural field parcels. The site amounts to 4.1 hectares. It is located on grid reference co-ordinated E:295551; N:283741. The site lies to the south east of the existing mature residential estate at Dolgwenith and Tan- y- Bryn. It is opposite the newly completed Parc Derw estate.
- 2.4 The boundary to Bryn Du Road is taken up by the builder's yard as well as the domestic frontage to Ael Y Bryn. Bryn Du Road climbs in a south easterly direction towards Tylwch. To the South West of the site there is Vaenor Park which is set within established landscaped grounds and is not visible from the application site.
- 2.5 There are 26 no. dwellings at Tan- y- Bryn and 41 no. dwellings at Dolgwenith. Opposite the site at Parc Derw there are 16 no. dwellings.
- 2.6 The general pattern of residential development in the area is of a mix of semi and terraced houses on Dolgwenith and Tan- y- Bryn and attached houses on Parc Derw. In addition there are several bungalows on the aforementioned estate. Adjacent to the application site there is a single width access track which services a small number of more isolated homes which peter out into the open countryside.
- 2.7 The site works well with the existing residential pattern of Llanidloes. Access to the site is currently via the builder's merchants and there is also a vehicular access to Ael Y Bryn as well. Both access points are on to the B4518 Bryn Du Road.

- 2.8 The site slopes from its boundary with the single width access track from a maximum of 200.87 AOD down to the Bryn Du Road at an average of 191.68 AOD. The lowest part of the site is adjacent to the bypass at 184.81 on average across the site frontage. The A470 Llanidloes bypass is on average 3m below this point.
- 2.9 The eastern boundary of the site is marked by a hedge to the single width access road. The boundary to Dolgwenith and Tan- y- Bryn is also marked by a mature hedgerow with some trees. A small watercourse bisects the lower land parcel in a south east to north west direction. .
- 2.10 There is a culvert and chamber to which existing surface water discharges on the upper most part of the site. This is an assumed silt pit which then tracks across the builder's merchants site underneath the building connecting in to the existing surface water system on Bryn Du Road.
- 2.11 The majority of site boundaries are characterised by existing mature hedgerows with trees all of which are to be retained as part of this application.
- 2.12 The builder's merchant building on Bryn Du Road is set on average 188.15 AOD. It is of a haphazard shape and obviously has been added to over time. It is in the main, two storeys in size, and has historically been a worthy commercial attribute for Llanidloes. Over time the town has gradually crept up the Bryn Du Road towards this building now rendering it a curious neighbour to existing residential estates.
- 2.13 The existing house at Ael Y Bryn has floor level at 190.7 AOD. Its ridge level is at 196.88 AOD. The house is set askew to Bryn Du Road and has parking and a domestic garden within its curtilage.
- 2.14 The site is not crossed by any public rights of way.
- 2.15 To the north of the site, Bryn Du Road has a minimum width of 6m. The site currently has no footways either side of the carriageway in the position of the application site. There is a substation further up Tylwch Road but this is not connected to the application site.
- 2.16 Tylwch Road is adjacent the site and the potential point of access is within a 30mph speed limit.
- 2.17 All local roads north west of the application site that serve existing residential estates benefit from footways along their entire length which eventually connect with the town centre of Llanidloes.

## **Local Facilities & Services**

- 2.18 The site lies within reasonable walking distance of facilities and services provided in the town, as illustrated within the Transport Statement supplied with this document. The centre of Llanidloes at Great Oak Street is located within 640 metres walking distance of the site whilst the Primary School is located within 800 metres and the High School 1.29 kilometres.
- 2.19 In terms of accessibility, the submitted Transport Statement illustrates that the site is accessible for cyclists and in terms of specific infrastructure, cycle routes local to Llanidloes and the development site are:
- The National Cycle Network (NCN) **Route 81** – Lon Cambria (Aberystwyth to Shrewsbury running West to East)
  - The National Cycle Network (NCN) **Route 82** – Lon Las Cymru (Holyhead to Cardiff running North to South)
- 2.20 From the town centre, a number of bus services provide services to local towns and beyond. These are summarised in the accompanying Transport Statement but to confirm Routes X75 (Newtown, Welshpool and Shrewsbury), 525 (Aberystwyth), X47 (Llandrindod Wells) and X85 (Newtown) serve the town and provide connections to other regional centres. The submitted Transport Statement provides full details of the available bus services.

## **Planning history**

- 2.21 The site has no recent planning history. The site was zoned in the Montgomeryshire Local Plan 1996 for housing.

## **Application Proposal**

### **The Proposal**

- 3.1 The planning application is proposed to be made in 'outline' with only the means of access to the site considered at this stage. All other matters will be considered at 'reserved matters' stage.
- 3.2 The application is supported by an 'indicative' site layout and a full suite of technical supporting documents which illustrate that the site is capable of accommodating approximately 96 dwellings along with associated car parking and landscaping.

### **Access**

- 3.3 Vehicular access to the site is proposed via a new priority junction with the B4518 Bryn Du Road as illustrated on the application plans. The existing site has a current existing usage as a builder's yard and site to an existing dwelling house both of which communicate with the B4518. The pattern of vehicular usage is as per the attached Transport Statement.
- 3.4 Visibility splays of 2.4 x 90m in either direction can be achieved from the proposed priority junction in to the site. This is in accordance with the Manual for Streets for a 30mph zone.

### **Traffic Calming**

- 3.5 The recorded traffic speeds from February 15 2013 – February 25 2013 are as per the Transport Statement attached. It is noted that the 85<sup>th</sup> percentile speeds are 40.7 mph which is very much in excess of the regulatory speed limit in the south bound direction. To the north bound direction speeds are slightly less but still the 85<sup>th</sup> percentile is at 36mph again in excess of the regulatory speed limit. As part of this application it has been considered that the location of the existing 30mph / 60mph speed limit change should be relocated further up the Bryn Du Road to bring the proposed development wholly within the 30mph speed limit. Although the requisite visibility can be achieved via the proposed access to accord with Manual for Streets standards it is essential that a form of traffic calming can be implemented. In this regard an entry feature is proposed that will reduce speeds entering the 30 mph zone to protect all existing and proposed road users along the Tylwch Road in this location. Details of the proposed relocation of the speed limit are included within the Transport Statement.

- 3.6 In addition to the above it is proposed to extend the existing footway to link the proposed development with the adjacent Dolgwenith / Tan- y- Bryn Estate. This will then provide a continuous footway all the way to local facilities and amenities located close to and within the town centre of Llanidloes.

### Mix

- 3.7 Details concerning layout, scale, appearance and landscaping will all be reserved for approval via any subsequent reserved matters application. Notwithstanding this, the illustrative layout (Drawing No. R095 1.0.02B submitted in support of the application shows a development of approximately 96 dwellings with an indicative mix of development as indicated in the table below.

Dwelling Type	No. of Units
2 bed bungalow	14 (of which 2 affordable)
2 bed terraced house	10 (of which 1 affordable)
2 bed semi-detached house	16 (of which 2 affordable)
3 bed terraced house	14 (of which 2 affordable)
3 bed semi-detached house	14 (of which 2 affordable)
3 bed detached house	22 (of which 1 affordable)
4 bed detached house (6p)	4
4 bed detached house (7p)	2

- 3.8 The above mix has been developed to provide a variety of house types and sizes and in direct response to localised market demand. By speaking with Local Agents it has been confirmed that there is a strong demand for smaller starter homes and family houses in the town.

### Layout

- 3.9 The alignment and design of the internal access road and the design and layout of the proposed houses will be subject to detailed design as part of any subsequent reserved matters application, however, the submitted indicative layout provides an indication of how the development *could* be laid out.
- 3.10 The internal access of the site is proposed, for the majority, as a 6m wide adoptable highway widening at bends to accommodate the swept path of large vehicles, such as refuse vehicles and delivery lorries, which may need to serve the development.

- 3.11 Off the main spine road, the illustrative layout shows a number of further access roads, some adopted and some designed as private drives to serve the proposed dwellings. All access roads are designed to accommodate turning facilities to allow vehicles to enter and exit the site in a forward gear. There is an opportunity for shared surfaces or shared spaces throughout the development but this will be a reserved matter.

### **Parking**

- 3.12 Vehicle and cycle parking provision will be a matter to be considered in any subsequent reserved matters application. However, the indicative layout illustrates car parking provided in accordance with CSS Wales Parking standards, i.e. 1 space per bedroom up to a maximum of 3 spaces per dwelling / in respect of visitor parking, this must be provided at a rate of 1 space per 5 dwellings. The internal road layout had been designed to be 5.5m wide which, in accordance with Manual of Streets (Ref. Figure 7.1), is wide enough for a car and a large vehicle such as a refuse vehicle or delivery lorry to pass. On this basis, visitor parking can be accommodated on-street. In terms of cycle parking, each proposed dwelling is provided with ample parking amenity space which can accommodate either garages or garden sheds which will provide space for secure storage of bicycles.
- 3.13 It is acknowledged that on street parking on Bryn Du Road after 1800 is an issue. As a contribution to the community it is proposed to offer off road parking for existing residents within the application site to overcome this problem.
- 3.14 In terms of pedestrian provision, 2m wide footway will be included on one or both sides of the internal access road for its entire length. Where appropriate a number of shared use private drives, where the needs of pedestrians and cyclists supersede the vehicle will feed into the main spine road.
- 3.15 Walking and cycling connectivity will be from a single point of access onto Tylwch Road where the existing verge shall be converted into a metalled footway to an adoptable standard to provide a physical link to the rest of the town. This is proposed so as to provide a continuous traffic free link into Llanidloes (and its associated amenities). This shall keep vehicle intimidation to a minimum with the aim to encourage and prioritise walking and cycling.

## **Density**

- 3.16 Whilst density is not a matter to be considered at outline stage, the scheme as presented in the illustrative layout represents a medium density housing development of 22.33 dwellings per hectare (dph). This seeks to strike a balance between making the best use of available land whilst also encouraging the sufficient land is set aside to provide strategic landscaping and to reflect the prevailing scale and grain of development nearby.

## **Trees & Landscaping**

- 3.17 Whilst landscaping is a Reserved Matter, the application is also supported by a proposed Landscape drawing from our practice. In addition to this a Landscape and Visual Appraisal (LVA) is appended to this application pack. We have proposed strategic landscaping to mitigate any negative effects of development over the long term. The retention of the existing trees and hedgerows as well as strengthening boundaries with native landscaping is seen as vitally important in order to mitigate any visual impact of the development on the immediate and wider landscape. This also provides screening of the development from nearby residential properties along the shared access road. The proposed development on the site will therefore not result in any significant loss of any trees or hedgerows.

## **Summary of supporting document**

- 4.1 The following section intends to provide a brief overview of the supporting documents which have been prepared to accompany the planning statement for the proposed development.

## **Design and Access Statement**

- 4.2 A Design and Access statement shall be prepared by Hughes Architects to accompany the application. The DAS considers the context and characteristic of the site and appraises the development against the relevant design and access policies contained within the development plan.

## **Transport Statement**

- 4.3 Early pre-application consultation with Powys County Council Highways Authority and with the North and Mid Wales Trunk Road Agency has established that the proposed development needs to be supported by a Transport Statement. Entran have produced such a document which shall detail the transport characteristics of the proposed development and its potential impact on the surrounding transport networks and is included within the application pack.
- 4.4 In addition, an automatic traffic count was undertaken on Bryn Du Road during the period 13<sup>th</sup> – 25<sup>th</sup> February 2013. The counters recorded both the volume and speed of traffic past the application site. The 85<sup>th</sup> percentile 'wet weather' speeds of vehicles travelling along Bryn Du Road past the application site were recorded as 40.7 mph in a north bound direction and 36mph in the south direction. This does show that vehicles are travelling above that of the enforceable 30mph speed limit.
- 4.5 The Transport Statement considers the capacity of the local and wider highway network to accommodate traffic generated with the development. Based on an approximate development of 101 dwellings the Transport Statement concludes that the development could generate up to 56 vehicle trips (two-way) in the morning peak period and up to 60 vehicle trips (two-way) in the afternoon peak period. In respects of possible impact of the development on the road network it is confirmed that the increase in traffic will not be detrimental to the local highway network.

## **Drainage Strategy Report**

- 4.6 Given the position of the application site outside of any flood risk areas and within the general confines of a location which is adequately served by mains utility infrastructure there is no Flood Consequence Assessment accompanying this application. A strategic drainage strategy report shall be provided by CES.
- 4.7 Soakaway tests shall be carried out as well as a surface water drainage strategy appraisal.

## **Landscape and Visual Assessment**

- 4.8 The application is supported by a Landscape & Visual Appraisal prepared by Lingard Styles. This shall provide a specific assessment of the potential landscape and visual impact of the proposed development. Detailed desktop surveys were carried out of published material on the landscape of the site and its wider context. Fieldwork enabled the recording of various landscape elements such as topography, land use and vegetation. From the analysis of the combination of material, it was possible to carry out an evaluation of landscape character and assess the predicted effect of the proposed development.
- 4.9 The report concludes that the development proposal complies with the raft of applicable national, regional and local planning policies related to the landscape and that the overall effects on the surrounding landscape will not be significant.
- 4.10 The protection, retention and enhancement of existing mature landscape features is a key feature of the landscape and visual mitigation which once established will result in no significant visual impact on residential receptors or on users of the road network.
- 4.11 A Preliminary Ecological Appraisal has been undertaken by Mid Wales Ecological consultants dated November 2016 and is appended to this application. This has assessed whether the proposed development impacts on any protected species and habitats. The report found that the site comprises existing improved grassland, amenity grassland, ephemeral/short perennial, and introduce shrub.
- 4.12 The report concludes that habitat loss will be restricted to within the boundary area of site and with mitigation measures and biodiversity enhancements the proposed development will not have a significant impact upon the sites, species and habitats.

- 4.13 The site is not designated for wildlife interest at an international, national or local level and there are no legally protected plants or species identified hence the impact of the development upon such is low. The report concludes that there are no ecological reasons why this site cannot be developed for residential purposes.

#### **Arboricultural Survey**

- 4.14 An Arboricultural has been commissioned by the applicant.

#### **Summary**

- 4.15 Given all of the conclusions in the reports referred to above there are no technical obstacles to the granting of planning approval for residential development on this site.

## **Planning Policy Framework**

- 5.1 The planning policy framework for the determination of this application is provided by national planning guidance, together with the statutory 'development plan'.
- 5.2 National planning policy is contained within the ninth edition of Planning Policy Wales (PPW), published in November 2016. PPW is supported by 21 topic-based Technical Advice Notes (TANs), which are also relevant.
- 5.3 The statutory 'development plan' for this site is currently provided by Powys County Council's Unitary Development Plan (UDP) which was adopted on 1st March 2010.

## **Planning Policy Wales (PPW)**

- 5.4 PPW is the principal planning policy document of Welsh Government that should be taken into account in the preparation of development plans and in the determination of planning applications and appeals. The main thrust of PPW is to promote sustainable development by ensuring that the planning system provides for an adequate and continuous supply of land available and suitable for development. It dictates that available land must meet society's needs in a way that is consistent with overall sustainability principles.
- 5.5 PPW identifies the overall basis on which the planning system is to operate. It confirms at paragraph 1.2.2 that:

*"The planning system must provide for an adequate and continuous supply of land, available and suitable for development to meet society's needs".*

- 5.6 Paragraph 4.7.7 of PPW relates specifically to opportunities for reducing car use within rural areas and increasing the use of public transport, walking and cycling, advising.

"In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole."

- 5.7 Chapter 9 of PPW relates specifically to Housing. The Welsh Government's approach, as set out in the National Housing Strategy is to:
  - *"provide more housing of the right type and offer more choice;*
  - *improve homes and communities, including the energy efficiency of new and existing homes; and*
  - *improve housing-related services and support, particularly for vulnerable people and people from minority groups."*

5.8 In regard to housing development, chapter 9 of PPW states that LPA's should:

'...promote sustainable residential environments, avoid large housing areas of monotonous character and make appropriate provision for affordable housing...Local planning authorities should promote:

- mixed tenure communities;
- development that is easily accessible by public transport, cycling and walking, ...;
- mixed use development so communities have good access to employment, retail and other services;
- attractive landscapes around dwellings, with usable open space and regard for biodiversity, nature conservation and flood risk;
- greater emphasis on quality, good design and the creation of places to live that are safe and attractive;
- the most efficient use of land;
- well designed living environments, where appropriate at increased densities;
- construction of housing with low environmental impact (see 4.12);
- reducing the carbon emissions generated by maximising energy efficiency and minimizing the use of energy from fossil fuel sources, using local renewable and low carbon energy sources where appropriate; and
- 'barrier free' housing developments, for example built to Lifetime Homes standards."

5.9 Paragraph 9.2.8 within the housing chapter provides specific advice on the search sequence that should be applied to identifying sites for housing. The advice states that:

- identifying sites to be allocated for housing in development plans, local planning authorities should follow a search sequence, starting with the re-use of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links."

5.10 Paragraph 9.2 14 relates to affordable housing and states:

'A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies."

5.11 Paragraph 9.3 states that:

"New housing developments should be well integrated with and connected to the existing pattern of settlements."

5.12 Paragraph 9.2.3 of PPW concerns the requirements of LPA's to maintain a 5-year supply of housing land. This states:

"Local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints,

and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types. For land to be regarded as genuinely available it must be a site included in a Joint Housing Land Availability Study. The Welsh Government will monitor development plans and their implementation to ensure that sufficient housing land is brought forward for development in each local planning authority and that economic development and related job opportunities are not unreasonably constrained.

### **Technical Advice Notes**

- 5.13 PPW is supported by 21 Technical Advice Notes (TAN"s) which provide more detailed guidance on a variety of issues. In respect of this application, the following TAN'S are considered to be of relevance.

*Technical Advice Note 1: Joint Housing Land Availability Studies (January 2015)*

- 5.14 At paragraph 2.1, TAN 1 reiterates the requirement for each LPA to maintain a 5-year housing land supply. This states:

"The requirement to maintain a 5-year supply of readily developable housing land in each local planning authority across Wales remains a key planning policy requirement of the Welsh Government. The planning system, through the LDP process, must provide the land that is needed to allow for new home building and local planning authorities are required to ensure that sufficient land is genuinely available to provide a 5-year supply of land for housing."

- 5.15 Paragraph 12 explains how LPA's must produce Joint Housing Land Availability Assessment Studies (JHLAS) to demonstrate that they have a 5-year housing land supply. This states;

"The Joint Housing Land Availability Study (JHLAS) is the mechanism for local planning authorities to demonstrate that they have a 5-year housing land supply by providing an agreed statement of housing land availability for development planning and development management purposes "

- 5.16 Paragraph 6.2 of the TAN goes on to state:

"The housing land supply figure should also be treated as a material consideration in determining planning applications for housing. Where the current study shows a land supply below the 5-year requirement or where the local planning authority has been unable to undertake a study (see 8.2 below), the need to increase supply should be given considerable weight when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies."

- 5.17 As mentioned earlier in this statement, the current UDP has now expired. The adoption of the LDP is not expected until late 2017. As such, the LPA will have no adopted development plan for at least a year. Paragraph 8.2 of the TAN states that where the LPA has no adopted development plan in place then it will be deemed to not have a housing land supply. It states:

"...local planning authorities that do not have either an adopted LDP or UDP will be unable to demonstrate whether or not they have a 5-year housing land supply and effectively will be considered not to have a 5-year supply. Those LPAs without an adopted development plan will be unable to produce a JHLAS until an adopted LDP is in place."

*Technical Advice Note 12: Design*

- 5.18 TAN 12 (July 2014) provides advice on design considerations and, in relation to housing design, it states that local planning policies and guidance should aim to:

- "create places with the needs of people in mind, which are distinctive and respect local character,
- promote layouts and design features which encourage community safety and accessibility,
- focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles;
- avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building;
- promote environmental sustainability features, such as energy efficiency.. in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards;
- secure the most efficient use of land including appropriate densities; and
- consider and balance potential conflicts between these criteria.

*Technical Advice Note 18: Transport*

- 5.19 TAN 18 offers national guidance on transportation related planning policies and advises that it should be read in conjunction with Manual for Streets. It advocates:

- "the integration of land use planning and transport in order to promote resource and travel efficient settlement patterns;
- ensuring that development is located where there is good accessibility by public transport, cycling and walking. This minimizes the need to travel and promotes social inclusion; and
- managing parking provision."

## Development Plan Policy

### *Powys County Council Unitary Development Plan (2001-2016)*

- 5.20 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the 'development plan' unless material considerations indicate otherwise.
- 5.21 The statutory 'development plan' for this site is currently provided by Powys County Council's Unitary Development Plan (UDP) which was adopted on 1<sup>5</sup> March 2010. However, the UDP has expired on 30 June 2016 and is due to be replaced by the emerging Local Development Plan (LDP) which is now moving towards hearing stage in early 2017.
- 5.22 On the UDP Proposals Map, the application site lies partially within the settlement boundary for Llanidloes. An extract of the UDP Proposals Map for Llanidloes is provided at Appendix 2 of this document.
- 5.23 Part One of the UDP sets out a Sustainable Growth Strategy that seeks to concentrate the majority of housing, economic and retail development in the larger market towns, known as 'area centers' and the largest villages, referred to as 'key settlements and 'large villages'. The town of Llanidloes is identified as an 'Area Centre', and therefore sits at the top of the settlement hierarchy and is therefore considered to be a sustainable settlement capable of supporting necessary housing and employment growth.
- 5.24 In line with this, UDP Policy 5P2 sets out a Strategic Settlement Hierarchy which states:

"Land is allocated for development to reflect the needs of each planning area/community, the capacity of each settlement/community, and the principles of sustainability in accordance with the following settlement hierarchy:

- Area centres
- Key settlements
- Large villages
- Small villages
- Rural settlements
- Countryside"

- 5.25 Policy SP1 of the UDP seeks to ensure that development proposals contribute towards the social, community and cultural sustainability of local communities. This states:

In assessing proposals for new development due regard will be given to the need to sustain and where possible enhance the social, cultural and linguistic characteristics of the area and to the contribution that the proposals can make towards meeting the needs of local communities and residents."

5.26 UDP Policy 5P3 seeks to ensure that development proposals have due regard to natural, historic and built heritage. This states:

- A.** "In order to safeguard the natural heritage of Powys, development proposals will be expected to take account of the need to protect, conserve and wherever possible enhance sites and features of importance for their aesthetic, amenity, biodiversity, ecological, geological, nature conservation, physiographical and scientific value.
- B.** Proposals for development should seek to protect, conserve and wherever possible enhance sites and features of historic and built heritage importance including those of archaeological, architectural, heritage conservation and historic interest."

5.27 UDP Policy SP5 seeks to allocate land for housing development across the County. This states:

"Sufficient land is allocated, including appropriate existing allocations and commitments, to accommodate up to approximately 6140 additional dwellings (410 per annum) between mid 2001 and mid 2016, in accordance with the council's strategic settlement hierarchy."

5.28 Part 2 of the UDP sets out general development control and design policies that apply to all planning applications. The following list of UDP general policies are considered to be of most relevance:

5.29 Policy GP1 is a general development control policy applicable to all applications for development. This states:

"Development proposals will only be permitted if they take into account — where appropriate — the following:

1. The design, layout size, scale, mass and materials of the development shall complement and where possible enhance the character of the surrounding area;
2. The design, layout and lighting of the development shall minimise the potential for crime;
3. The amenities enjoyed by the occupants of nearby or proposed properties shall not be unacceptably affected by levels of noise, light, dust, odour, hours of operation or any other planning matter;
4. Adequate utility services shall exist or be capable of being readily and economically provided without unacceptable adverse effect on the surrounding environment;
5. Important trees, hedgerows, stone walls, open spaces and other local features that contribute significantly to the quality and character of the local environment shall be safeguarded and, where practicable, enhanced;
6. Developments shall be landscaped using appropriate indigenous species or materials which complement and enhance the character of the locality. Additionally, development proposals must take into account:

- a) The needs of all transport users, especially pedestrians and cyclists (policies T4 and T6);
- b) The needs of those with disabilities and mobility impairment (policies T4 and DC1);
- c) Features and designated or proposed sites of natural, historic, archaeological or built heritage interest (policies ENV4, etc.);
- d) The protection of water and soil quality (policies DC9, DC10 and DC11);
- e) The need for adequate drainage (policies DC10, DC11 and DC13);
- f) Flood risk (policies SP14, DC13 and DC14);
- g) Highway access and parking (GP4). H. The development shall incorporate appropriate measures for energy, water and waste efficiency and conservation (GP3)."

5.30 Policy GP4 of the UDP concerns highway and parking requirements

This states:

"Permission for development proposals will be dependent on adequate provision for:

1. Highway access including visibility, turning, passing, dropped kerbs, circulation, and servicing space.
2. Parking in compliance with the county council's guidelines. The standard of parking provision required will be determined by both the nature and location of the development its accessibility to services by public transport walking or cycling, environmental considerations and any transport assessment and travel plan required under UDP policy T3.

In support of the principle of maximum parking standards, planning obligations may be sought for improvements to public transport services and/or facilities for walking and cycling. All parking areas should be well designed in terms of safety, circulation and appearance and assist access by pedestrians, cyclists and the mobility impaired."

5.31 Policy ENV2 seeks to ensure the development proposals have due regard for the landscape. This states:

"Proposals for the development and use of land should take account of the high quality of the landscape throughout Powys and be appropriate and sensitive to the character and surrounding landscape. Where appropriate, account will also need to be taken of the special qualities or reasons for designation of the Brecon Beacons and Snowdonia National Parks. Proposals which are acceptable in principle should:

1. Contain appropriate measures to ensure satisfactory integration into the landscape;

- 2** Not unacceptably adversely affect features of importance for nature conservation or amenity; and
- 3** Not result in significant damage to ancient and semi-natural woodlands and should seek to conserve native woodlands, trees and hedgerows."

5.32 Policy ENV3 seeks to protect safeguarded biodiversity and natural habitats. This states:

"The need to maintain biodiversity and the nature conservation and amenity value of habitats and features that are of importance for wild flora and fauna is recognised. Wherever possible, those interests will be protected against adverse forms of development and they will be maintained within development proposals."

5.33 Policy HP3 reiterates the need for the Council to maintain a 5-year supply of housing land. This states:

"Through the process of monitoring and review, the Council will ensure that there is at least a five-year supply of genuinely available land for housing within the plan area."

5.34 Policy HP4 sets out policy regarding settlement development boundaries and the capacities of settlement to accommodate development. This states:

- A.** 'Allocated housing sites - residential developments complying with UDP Policy HP5 will be permitted on sites allocated for housing development on the proposals map insets where the scale and density of the development would be in line with the guidelines for sites contained in appendix 2. Proposals that would lead to the overall capacity of the settlement being significantly exceeded will be refused.
- B.** Windfall sites - residential development will also be permitted on other suitable sites within development boundaries that comply with UDP Policy HP5 and where the scale and density of the development would not lead to the overall capacity of the settlement being significantly exceeded and the site (s) would be in accordance with the following guidelines:
  - Area centres: sites with a capacity of up to 30 dwellings.
  - Key settlements; sites with a capacity of up to 20 dwellings.
  - Large villages: sites with a capacity of up to 1 □ dwellings.
  - Small villages: sites with a capacity of up to 5 dwellings.
- C.** Outside settlement development boundaries, proposals for new residential development will only be approved where they comply with UDP Policies HP6, HP8 or HP9."

5.35 Policy HP5 referred to with the above policy concerns the development of allocated sites and other sites within settlement boundaries. This states:

"Residential developments proposals for residential development on allocated sites, as shown on the inset maps, and on other appropriate sites within the development limits of settlements will be permitted providing that the development complies with the following criteria:

1. On allocated sites for 5 or more houses, a proportion of affordable housing is provided in accordance with Policy HP7.
2. The proposed development shall be of a scale, form and design and general character, to reflect the overall character and appearance of the settlement and surrounding area.
3. The proposed development would not lead to the loss of land allocated for other purposes within the UDP.
4. The proposal will not create unacceptable safety access, service, environmental or amenity problems."

5.36 Appendix 2 of the LDP provides a schedule of Powys Settlements and Allocated Housing Sites (5 or more dwellings)'. The relevant extract relating to Llanidloes is provided at Appendix 3 of this statement. The allocated site component included within the LDP has reference M163 HA6 entitled Ty Coch Lane OS6582 and had a dwelling capacity of 5. The site area is 0.8 Hectares and when considered under a target dwelling of rate of 25 dwellings per hectare its allocated housing number is woefully under this number.

5.37 Policy T2 concerns the development of traffic management schemes and states:

"Sensitively designed traffic management schemes will be approved which utilize the existing road network and improve opportunities to promote public transport, walking, cycling and horse riding, improve road safety, reduce traffic congestion and improve the local environment in order to reduce the level of unnecessary road traffic and its adverse impact upon the environment'

5.38 Other relevant policies include:

- SP6 - Development and Transport
- Policy GP2 - Planning Obligations
- Policy ENV1 - Agricultural Land
- Policy ENV9 - Woodland Planting
- Policy HP1 - Shire Housing Allocations
- Policy HP10 - Affordability Criteria
- Policy T3 - Transport Assessments and Travel Plans
- Policy T4 - Transport User Hierarchy
- Policy T6 - Walking and Cycling
- Policy T8 - Access by Disabled Persons

- Policy DC1 - Access by Disabled Persons
- Powys County Council Local Development Plan (LDP)

- 5.39 The LDP has reached 'Deposit' stage and in January 2016 it was submitted to the Welsh Government for examination. Consultation on 'Further Focused Changes' ended in November 2016. Hearings will be undertaken in Spring 2017. It is not anticipated that the LDP will be adopted until late 2017 at the earliest. This will be nearly a year and a half after the expiry of the UDP.
- 5.40 If, and when, the LDP is adopted, it will form the Development Plan for Powys (excluding the Brecon Beacons National Park) and will be the basis for decisions on land use planning affecting that area. However until adopted, the LDP will have no status.
- 5.41 Notwithstanding this, it is acknowledged that the LDP is based on a more up to date evidence base and incorporates the provisions of updated national policies, including the new TAN 1' Joint Housing Land Availability Studies.
- 5.42 The revised Deposit version of the LDP continues to show Llanidloes at the top of the settlement hierarchy and identifies it as one of 15 'Towns' which represent the most sustainable settlements in the County and which should be focus for new development over the plan period. Paragraph 3.4,8 of the LDP describes these 'Towns' as:
- "... the principal location for accommodating housing (open market and affordable), employment land, any retail growth (e.g. supermarkets), public services and developments which generate large numbers of trips."
- 5.43 The site which was previously included within the UDP for residential allocation is now regarded as 'white land' within the LDP. However it is acknowledged that this site has no significant technical hurdles to its development.
- 5.44 The remainder of the site lies outside of the settlement boundary of the current UDP and also the Deposit LDP proposals Maps included at Appendix 4. It is not identified as lying within any specific designation such as green wedge, special landscape area, site of interest to nature conservation or site of special scientific interest
- 5.45 It is interesting to note from the previous clause that there are no technical issues to the delivery of the proposed site for residential development. This is proven by the responses from the statutory consultees none of which have denoted any real tangible concerns for the development of the site. The only reason for this site not being included in the LDP was because of its lack of promotion by the agent acting on behalf of the land owner. In our considered opinion the land itself should be included for development as it works well with the settlement pattern of Llanidloes and is truly deliverable over the plan period.

5.46 The following SPG documents are considered to be relevant in the consideration of this application:

- Affordable Housing SPG - Approved September 2010, Updated July 2011
- Residential Design Guide — October 2004
- CSS Wales Parking Standards

5.47 The Council, in its role as the Highways Authority, has adopted the CSS Wales Parking Standards which requires parking to be provided at a rate of 3 parking spaces per bedroom up to a maximum of 3 spaces per dwellings. On this basis, a 2 bedroom dwelling must have 2 off-street spaces whilst 3 and 4 bedroom dwellings must have 3 off-street spaces. Garages may only be counted as parking spaces if they have clear internal dimensions, as suggested by Manual for Streets, for a single garage of 6m x 3m. If disabled access is required, these dimensions must be increased to 6m x 3.8m. All properties with a garage must also have a 6m long driveway which has a width of not less than 3.6m.

## Housing Land Supply & Housing Need

### Housing Land Supply

- 6.1 As noted earlier, Welsh Government, through PPW TAN 1 requires that all Local Planning Authorities must maintain a 5 year supply of housing land. The most recent Joint Housing Land Availability Study (JHLAS) (April 2015) shows that Powys have only 2.2 years' worth of deliverable housing land, which is therefore significantly below the required 5 year supply Furthermore, given that the UDP is time expired in accordance with TAN 1, the Council is now deemed to have 0-year supply. An extract of the JHLAS is provided at Appendix 5 of this Statement.
- 6.2 In Llanidloes itself, the UDP identified allocated residential development sites for up to 155 dwellings to be developed up to 30th June 2016. This is illustrated on the table at Appendix 3 which is adapted from the UDP inset Map M162163 the number of dwellings that have been delivered on these allocated sites.
- 6.3 Table below illustrates that in Llanidloes itself, **only 57 dwellings were delivered out of 155 that were allocated in the UDP**, representing a delivery rate of 37%. To put this in simple terms the LDP forecast at least 15.5 dwellings being constructed in Llanidloes over the plan period. In fact it only delivered 3.7 dwelling per year over the plan period. This is one of the many reasons that Mid Wales towns continue to stall in terms of their growth. The Table below illustrates this in more detail on a site by site specific basis.
- 6.4 The JHLAS 2016 included at Appendix 5 lists all potential development sites within Llanidloes that are either allocated or benefit from planning permission.  
  
This shows that out of 203 units only 35 dwellings (fewer than 18%) have been delivered.
- 6.5 The fact that so little new housing has been provided despite the previous UDP allocation leads us to question the deliverability of many of these sites and others destined to be allocated in the emerging LDP.
- 6.6 In order for the LDP to be adopted, the LPA will need to demonstrate there is a 5-year land supply upon adoption. **For Llanidloes, despite the fact that the UDP has delivered just 57 of the allocated 155 dwellings, the emerging LDP allocates land with a capacity for just 152 dwellings plus two sites of unspecified number.** The number proposed is considered to be grossly insufficient for a settlement the size of Llanidloes which is defined as an 'Area Settlement' at the top of the settlement hierarchy and over a plan period which extends to 2026.

Table 4: Adaption of JHLAS (April 2016)									
Site Ref. And Name	Completed Total	Capacity	Remaining	Area (Ha)	JHLAS Category				
					Within 5 years		5 years+		
					1	2	3	4	5
M162 HA1 - Land opp. Rock Terrace	3	12	9	0.53	0	1	2	3	3
M162 HA2 - R/O Pen Y Borfa, Trefeglwys	0	18	18	1.1	0	0	0	0	0
M162 HA3 - Land East of KTH. Gorn Road, Llanidloes	0	30	30	2.57	0	0	0	0	0
M162 HA4 - Land East of Rhos-Y-Maen Uchaf	1	47	46	2.59	0	10	12	12	12
M161 HA5 - Land North of Dolgwenaiith, Bryn Du Road, Llanidloes	14	14	0						
M163 HA6 - Ty Coch Lane	0	5	5	0.8	0	0	0	0	0
M162 HA7 - Rear of Terwaithen Hotel	14	14	0						
M162 HA8 - Rear Brigdend Mill	0	6	6	0.03	0	1	0	0	0
M162 HA9 - Land Adj Manweb Station	31	31	0	0	0	1	2	3	3
<b>TOTALS of Llanidloes South (Private)</b>	<b>63</b>	<b>177</b>	<b>114</b>	<b>3.39</b>	<b>0</b>	<b>13</b>	<b>16</b>	<b>18</b>	<b>18</b>

6.7 Hughes Architects not only has serious concerns over the lack of housing allocations within the town in the emerging LDP, but serious concerns are also raised over the deliverability of many of the sites which have been allocated.

- 6.8 In relation to the sites included within the UDP, those sites included within the LDP and those sites within the JHLAS the housing picture in relation to Llanidloes is muddled at best. We refer to the adapted JHLAS table above in which there are certain sites that appear within this study but do not appear within the Local Development Plan. The approach to zoning of land suitable for housing in Llanidloes is confusing. The supporting documentation to the consideration of candidate sites includes language which is contradictory and does not give us any confidence that the best land has come forward for development within Llanidloes. We list below those sites that are included within the Local Development Plan as being suitable for housing together with commentary extracted from the LPAs suite of supporting documents to justify the inclusion of those parcels of land within the LDP as well as our opinion in relation to the likelihood of those sites coming forward during the planned period based on anecdotal, historical and local intelligence. These sites need to be cross referenced in relation to our annotated plan of the town at Appendix 8. We have numbered the land parcels ourselves as to include MLP, UDP as LDP numbers will be confusing.

**Site No. 1: Lower Green, Victoria Avenue. (MLP allocated Whiteland, UDP public amenity land, LDP site reference P35 HC1)**

This site benefits from planning application ref: M/2006/0103 (renewal S73 reference P/2013/0391) and this approval seems to have been activated by virtue of laying one foundation for one of the dwellings. This is far from clear though as the LPA office has no documentary evidence to substantiate this.

We are aware that this site is being marketed as the current owner does not have ambitions within this development plan for building out. The site is flat and lies within the Llanidloes character area of the Clywedog Valley Registered Historic Landscape. It works well with the settlement pattern of Llanidloes but we have it on good authority that there is no ambition to build this site out to completion in the immediate future.

So while this is a commitment to starting development there is no commitment to finishing development. Therefore in our opinion this does little to deliver upon the need for housing within Llanidloes over the plan period.

It is our view that this site *will not bring forward any dwellings* (31 forecast) in the plan period so should be discounted from further consideration towards housing numbers in Llanidloes.

**Site No. 2: Land at Hafren Furnishers. (MLP committed residential site, UDP white land within the settlement, LDP ref P35 HC2)**

The site that was not promoted at candidate site stage. It does however benefit from planning approval in outline for 23 dwellings (P/2008/0406). This was a re-submission following a previous refusal in 2004 on the grounds of flood risk on site.

The site is currently occupied by a number of agricultural style industrial buildings some are currently used for furniture manufacture and storage and others have been empty for 10 years. The site appears generally run down with areas to the rear and sides becoming overgrown. The River Severn bounds the south of the site and part of the site therefore lies within the C2 Flood zone as identified in TAN 15.

Like P35 HC1 above this approval has been activated but there is no documentary evidence to substantiate this. Unlike P35 HC1 however this application is in outline and no application for Reserved Matters seems to have been made so any activation of the development is unauthorised.

In addition the attention of the LPA is brought to the fact this application was approved without any form of affordable housing provision. It is our view that this site *will not bring forward any dwellings* (23 forecast) in the plan period so should be discounted from further consideration towards housing numbers in Llanidloes.

**Site No 3: Land at Dolhafren Cemetery. (MLP allocated site, UDP ref M162 HA9, LDP ref P35 HC3)**

This is one of the few sites to have been delivered over the plan period. This benefits from planning approval ref: P/2010/1330 and 31 dwellings have now been completed. While this is an acknowledged achievement of the UDP we see little merit including this as a committed development site within the LDP as it distorts numbers.

This site is complete and we are of the opinion this should not be included within the LDP plan period. There are a considerable number of households requiring housing in Llanidloes (124 no. alone on the Local Authority list) and the inclusion of completed sites does little to service this need.

The development brought forward 100% affordable housing for rent and shared ownership but no open market dwellings. This is a completed UDP site and consequently site *will not bring forward any dwellings* (31 forecast) in the LDP plan period so should be discounted from further consideration towards housing numbers in Llanidloes.

**Site No 4: Land at Pen y Borfa (MLP allocated site, UDP ref M62 HA2, LDP ref P35 HA1.)**

This site has been included within Llanidloes local plans for over 20 years and shows no sign of being developed. We see little merit in continuing to promote this site when it is clear the owner will not be developing over the plan period. This site has been reduced in size since its inclusion within the Montgomeryshire Local Plan 1995 because of flooding issues. The inclusion of this long dormant site does little to give us confidence that it will be built out during the plan period.

We make the point that the continued inclusion of several land parcels such as this within the settlement boundary of Llanidloes under the LDP is the best of a bad lot. This should not be a reason to include a parcel of land which has remained within 3 different development plans over a generation. If the LPA is serious about the ability of the LDP to deliver housing over the plan period this site should not be included within the plan. It is simply not a viable site and history has shown this to be true.

In the Site Status Update there is concern that this site 'would affect the siting of the formal burial ground.

Additional commentary centres on the fact that 'the foul water drainage could impact on the downstream pumping station and that there is no connection to foul or combined water sewers from this site. It shall also need to be subject to hydraulic modelling in order to ensure that it is truly deliverable'.

We therefore question as to whether the site is technically deliverable over the plan period and its inclusion within the LDP and JHLAS as being deliverable over the plan period distorts figures. It is our view that this site *will not bring forward any dwellings* (18 forecast) in the plan period so should be discounted from further consideration towards housing numbers in Llanidloes.

**Site No 5: Chapel Farm Gorn Road, Llanidloes (MLP outside of the settlement boundary, UDP ref M162 HA3m LDP P35 HA2)**

Notwithstanding the commentary in relation to the site above this site was not included within the Montgomeryshire Local Plan but has been zoned for housing since 2001.

The very fact that it has not been developed in 16 years is testimony to the fact that it is highly unlikely to be coming forward during the next plan period. There are too many technical obstacles to its development and the site has never been formally marketed for housing.

The LPA is reminded of the fact that the site was available during some of the most buoyant housing development the UK has ever experienced and did not come forward.

According to the JHLAS it has a delivery target of 30 dwellings. According to the Powys County Council Assessment of Site Allocations matrix it has a delivery target of 42 dwellings. This is a considerable difference. This is indicative of the haphazard way in which dwelling numbers for Llanidloes have been considered.

The site was promoted as part of the candidate site register and had reference CSR 1031. During the candidate site selection process there were no comments received by the Town and Community Council. There were concerns expressed by other consultees. Bearing in mind the elevated nature of this particular parcel of land Powys County Council expressed concerns that 'the development would have an adverse impact upon the Historic landscape. It goes on to describe the northern half of the site as being in a 'prominent location at the gate way to Llanidloes and is part of the Llanidloes Cutting which requires protection from development'. Of critical note is the fact the planners describe the site as being 'divorced from the settlement and would result in an intern encroachment into the open countryside'.

Given such a damning conclusion we find it very difficult to understand as to why this site had been included for development. Historically this site has never come forward for development. We see little to suggest this changing.

It is our view that this site *will not bring forward any dwellings* (30 forecast) in the plan period so should be discounted from further consideration towards housing numbers in Llanidloes.

**Site No 6: Enclosure 0816,0909 and 0792 opp. Rock Terrace, Van Road (MLP allocated site, UDP ref M162 HA3, LDP its unallocated but it is within the settlement boundary)**

This site according to the JHLAS has a capacity of 12 no. dwellings. 3 no. dwellings have been built since the site was allocated in 1995. If 3 houses have been built over the last 21 years we would propose that at a build rate of a house every 7 years it shall be complete by 2079. Without wishing to be too gleb about the slow build out rate of site in Llanidloes this is one of several parcels of land which have been commenced but not undertaken with any great degree of enthusiasm to complete.

The slow build outs of this site as well as UDP parcel M162 HA8 are indicative of the control of the development market in the town. We would encourage the LDP to use its endeavours in order to complete the sites in order that they can make a demonstrable difference to the need for housing in Llanidloes.

According to the JHLAS site completion is due for 2018 but it is obvious from a site visit this week this is not going to be achieved. With the above in mind this is yet another site which will not be contributing to the need for housing within Llanidloes over the plan period.

It is our view that this site *will not bring forward any dwellings* (9 forecast) in the plan period so should be discounted from further consideration towards housing numbers in Llanidloes.

**Site No 7: Land East of Rhos-Y-Maen Uchaf. MLP outside of the settlement boundary, UDP ref M163 HA4, LDP partial allocation for 4.no houses as white land)**

This site is a bit of a quandary. It was promoted during the candidate site register phase of the LDP and had reference CSR 332. In the Site Status Master the LPA reports that it is questioning the 'deliverability as the site 'has not come forward during plan period'. One would argue that this question could be asked of several other sites within Llanidloes but the LPA has not been consistent in its approach.

We specifically refer to land parcels UDP M162 HA2 and M162 HA3 which likewise have not come forward during the plan period.

The LPA goes on to note that there are 'concerns regarding obtaining suitable access to the site.... significant improvements including road widening sufficiently to serve the scale of development proposed would be required. Sewerage infrastructure improvements may be required'.

The LPA concludes that this 'site is not needed. Included 4 units for planning permission within development boundary'. With this in mind the LPA has allocated only that part of the site for 4 no houses (P/2013/0266 and updated P/2016/0472) within the development boundary. It is understood that this site now has planning permission for 51 no. houses (P/2015/1186).

This shows the site owners commitment to developing out this particular site. This is contrary to other land parcels in the town. It is very easy and cost effective to promote a site for inclusion with development plans. The real commitment is where the land owner is prepared to commit funds to undertaking a planning application in order to move a site forward. This site is included within the JHLAS as potentially delivering 46 houses over the plan period. This is one of the few sites in Llanidloes that shows signs of being built out.

Nevertheless its allocation will not go anywhere near the number of houses which are currently required but households on the Powys County Councils housing waiting list.

**Site No 8: Ty Coch Lane (MLP included as entirely deliverable; UDP ref M163 HA6, LDP white land within the settlement boundary(partial))**

This site is the subject of this application. Historically the entire land parcel including that land fronting the bypass was included within the Montgomeryshire Local Plan and this is illustrated at Appendix 1. We again refer to the preamble to this inset map and confirm at the time 'the majority of future growth will be located on suitable land which lies to the south (of the town) this area is relatively free of the physical constraints that hinder development elsewhere in the town.... this area represents the town's largest housing development opportunity and will supply a range of house types'.

There was an allocation as well adjacent to Garden Suburb which shows the direction of travel of the settlement of Llanidloes at the time. The UDP backed developments to

the North of the town and these have failed to deliver. We would therefore argue that now is the opportunity to consider land to the South of the settlement as these are free of constraints and entirely deliverable during the plan period.

This particular site relates strongly to the settlement pattern of Llanidloes, it is not divorced from the town and is not elevated in a gateway position. It has all the attributes that the other sites in the town that have been allocated within the LDP do not have. With this in mind we are of the opinion that this particular site is entirely suitable for residential development and should attract the support of the LPA and will go a considerable way to accommodating the numbers of dwellings in Llanidloes over the plan period.

**Site No 9: Adj, Bridge End Mill, Short Bridge Street (Allocated within the MLP, UDP ref M162 HA8 and in the LDP the site is unallocated but within the settlement boundary)**

There is no evidence of any planning activity on this site. It does not apparently benefit from any planning approvals and is included within the last 3 development plans as white land. It had the capacity to accommodate up to 6 no. dwellings. It is obvious that this number of dwellings will only contribute on a very small scale towards the actual number of dwellings required in Llanidloes over the plan period.

- 6.9 Whilst we have anecdotal information suggesting that one or more schemes may possibly come forward it must be kept in mind that several schemes have been allocated in local plans for many years without being developed,

### **Housing Need**

- 6.10 In terms of housing need and specifically affordable housing, Powys' Local Housing Market Assessment Update 2014 (LHMA) (extract provided at Appendix 9), identifies a need for 765 affordable dwellings over the first 5 years of the LDP period which equates to 153 dwellings per year. The LHMA identifies that the **Newtown and Llanidloes area have an annual affordable need of 23 social rented and 7 intermediate dwellings per year in order to keep up with demand.**
- 6.11 The current Powys Common Housing Register identifies the following households that are in need of housing in Llanidloes:

Table 5: Data from Powys Common Housing Register Need in Llanidloes (source: PCC Housing Management)	
Dwelling Type	Number of Households
1 bed house	5
2 bed house	27
3 bed house	22
4 bed house +	8
1 bed bungalow	24
2 bed bungalow	48
3 bed bungalow +	5
1 bed flat/bedsit etc	46
2 bed flat/bedsit etc	47
3 bed flat/bedsit etc	4

- 6.12 The above data contains an element of double counting due to some applicants requesting more than one type of property. However, Powys County Council housing services confirm a total of 124 household applicants of whom 72 require general needs housing; 50 require sheltered/older persons' housing and 2 require specially adapted property to meet their needs
- 6.13 With the **LDP proposing very few deliverable housing sites** in the short to medium term, **the need for both general and affordable housing** both across the County but more specifically within **Llanidloes is simply not being addressed** and the unmet need with simply worsen unless deliverable sites are brought forward as a matter of urgency.

## Appraisal

7.1 This section appraises the development against the key issues, which are identified as follows:

- The **principle of development** in terms of land use planning policy and sustainable development,
- The impact of the development on the **character and appearance of the surrounding area;**
- The impact of the development on the **residential amenity of surrounding properties;**
- The acceptability of the development in terms of **highways capacity and safety;**
- Any **other material considerations.**

The principle of development in terms of land use planning policy and sustainable development

7.2 The current development plan for Powys is the Unitary Development Plan (UDP) which expired on 30th June 2016. The LDP is currently being considered for adoption and this is scheduled for late 2017.

7.3 In terms of the location for new development, the UDP sets out a settlement hierarchy with six levels of settlement. Llanidloes is defined as one of 12 settlements identified as an Area Centre' and which sit at the top of the settlement hierarchy. Area Centres such as Llanidloes are defined by the UDP as those settlements are:

"the most appropriate locations for accommodating a substantial proportion of future housing and employment development on a scale that is appropriate to the town and relative to the planning area that it serves."

7.4 The emerging LDP continues to show Llanidloes at the top of the settlement hierarchy and identifies it as one of 15 'Towns' which represent the most sustainable settlements in the County and which will be focus for new development over the plan period. It is therefore established beyond doubt that the town is an appropriate location for new development.

- 7.5 The application site partially sits within the settlement boundary of the UDP in which it is defined as Parcel M163 HA6 and the size is 0.8 hectares. The same site is allocated as 'white land' within the PCC LDP. The remainder of the land sits astride the settlement boundary of Llanidloes and the entire red line planning unit was zoned for housing within the Montgomeryshire Local Plan October 1995. It is interesting to note in the transcript to Inset Map 62 of the MLP 1995 in Appendix 1 describes this part of Llanidloes as “**relatively free of the physical constraints that hinder development elsewhere in the town.**”

The residential allocations to the south and east of the Dolgwenith Estate will gain access directly off the Bryn Du Road via an improved unclassified highway. The widening of this highway could provide the opportunity to create a second access for Dolgwenith as well as allowing for access to almost 10 acres of land beyond. **This area represents the town’s largest housing development opportunity that will supply a range of house types.** There are further opportunities to provide an alternative range of housing elsewhere but these are much smaller in scale”. Obviously the MLP was superseded by the UDP. Certain land parcels within the UDP were promoted at the expense of this particular allocation. This was obviously on the premise that these land parcels were deliverable during the UDP Plan Period of 2001 – 2016. As will be seen from both preceding and succeeding conclusions the inclusion of these other land parcels has not borne fruit. These land parcels need to be removed from consideration for the deliverability of housing over the next plan period.

- 7.6 The site lies within a reasonable walking distance to facilities and services provided in the town, as illustrated within Figure 4.2 of the Transport Statement which provides walking distance isochrones from the centre of the application site to local facilities and services. The Chartered Institute of Highways and Transportation (CIHT) guidelines indicate walking distances as follows;

Table 9; Acceptable Walking Distances as adapted from CIHT			
Purpose of Journey	Desirable (m)	Acceptable (m)	Maximum (m)
Commuting	500	1000	2000
School	500	1000	2000
Other	400	800	1200

- 7.7 The approximate centre of the High Street is located within 640m walking distance of the site whilst the Primary School and High School are located within 800m and 1200m respectively. This demonstrates that the various facilities and services within the town are located within a 'desirable' or broadly 'acceptable' walking distance of the site.
- 7.8 In terms of accessibility, the submitted Transport Statement illustrates that the site is accessible for cyclists and in terms of specific infrastructure, cycle routes local to Llanidloes and the development site are:

- **National Cycle Network Route 81** – Lon Cambria (Aberystwyth to Shrewsbury running West to East)
- **National Cycle Network Route 82** – Lon Las Cymru (Holyhead to Cardiff running North to South)

7.9 The site sits astride the settlement boundary of Llanidloes with other sites within the town itself showing no signs of being developed out. We are of the opinion that the proposals for developing out this site comply with the provision of PPW and that the site itself is located in a sustainable location.

7.10 It is acknowledged that at the current time, in terms of the development plan, the development would be contrary to development plan policy. However, 538(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the 'development plan' unless 'material considerations' indicate otherwise. Therefore, in this case, we must consider whether there are any material considerations which weight in favour of the development, and if there are, whether they are of sufficient weight to justify the grant of planning permission contrary to the development plan.

7.11 The following matters are considered to be material considerations which weigh in favour of the principle of development:

- Contribution of the development to addressing 5-year shortfall in housing land supply
- Partial allocation of the site in the emerging LDP
- Contribution of the development to addressing on-going unmet affordable housing need across the County and in the town
- Contribution of the development to overcoming existing problems such as on street parking on Tylwch Road
- The whole of the application site is a deliverable site whereas there is uncertainty over the deliverability of other allocations in the LDP.

The above material considerations are considered in turn below.

### **Contribution of the development to addressing 5-year shortfall in housing land supply**

7.12 As explained earlier in this statement, the provisions of PPW and TAN 1 require that LPAs demonstrate that they have a 5-year supply of land readily available and suitable for development for housing. The number of units required to be provided should be calculated so as to adequately address the housing demands of an area.

- 7.13 The Council's latest agreed Joint Housing Land Availability Study (JHLAS), dated September 2016 (extract at Appendix 5), was published in September 2016. This shows that the Council only have a **2.2 year housing land supply**. Furthermore, now that the UDP has expired the Council will be deemed to have a 0-year housing land supply because they will not have either an adopted LDP or UDP in place.
- 7.14 At a County level, this is an obvious concern, but more significantly, at a local level, the lack of housing delivery is a serious problem. As an 'Area Town' at the top of the settlement hierarchy in both the UDP and the emerging LDP, Llanidloes should be the focus for significant housing growth and development through the plan period. As noted earlier in this statement, the UDP identified housing allocation sites capable of accommodating 155 dwellings. However, as illustrated in Table 5 earlier in this statement, only 57 dwellings were delivered out of the 155 that were allocated in the UDP representing a delivery rate of just 37%. Moreover, in respect of the 203 identified in the 2016 JHLAS, fewer than 20% have been provided with little certainty that the remainder can be delivered within five years.
- 7.15 With regard to Llanidloes, the JHLAS identifies that Llanidloes has capacity within the existing sites that are potentially available for 203 dwellings up to 2021. The JHLAS confirms that there are 160 plots remaining in the system to be built out. We would argue that out of these the allocations at sites 18, 164, 166, 216 and 296 of being delivered given our local knowledge. It is our professional opinion that knowing these sites as we do could lead to a considerable shortfall of housing over the plan period. If these sites do not come forward as predicted by the JHLAS then these amount to in total 108 dwellings. Bearing in mind the JHLAS confirms that there is remaining capacity for 168 dwellings in the system we would suggest only 50 would be delivered over the next 5 years. This is based on current planning applications and knowledge of each site.
- 7.16 TAN 1 that where Authorities cannot demonstrate a 5-year supply of land, **the need to increase housing land supply should be given 'considerable' weight in the determination of planning applications**, provided that all other material considerations are adequately satisfied.
- 7.17 In order to properly contribute to the 5-year housing land supply, PPW (Para. 9.2.3) insists that sites must be 'genuinely available or will become available' for development within 5 years and further that they should be 'free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development.'
- 7.18 As stated above, the UDP allocated housing sites are capable of accommodating 203 dwellings but **only 67 dwellings were delivered over the plan period**. A provision of around 96 no. Dwellings as part of this application will go some way into making sure supply matches up with demand.
- 7.19 The site therefore 'genuinely available' in accordance with PPW. The contribution to meeting the 5 year shortfall would be invaluable to the County and more importantly to the town. It is therefore considered that in light of the

serious lack of housing land supply across the County and more specifically in the town itself, **the delivery of approximately 96 houses on this site over a 5-year period should be afforded considerable weight in its favour.**

- 7.20 As already noted, the UDP has expired on 30<sup>th</sup> June 2016, and will not be replaced by the emerging LDP until it becomes adopted but this is not anticipated to occur until at least the end of 2017 at the very earliest. Furthermore, the UDP covers the period 2001-2016 and as such, it is becoming dated, and, it could be argued, not based upon an up-to-date evidence base or in accordance with PPW which has been updated several times since the UDP was adopted in 2010.
- 7.21 However, the emerging LDP has been prepared with an up-to-date evidence base and in accordance with the general sentiments of PPW. Whilst it does not yet have any significant status, it does provide a good indication of the direction of travel of planning policy and the location of development in Powys up to 2026. In the emerging LDP, the site sits astride the settlement boundary. We are of the opinion that **the application site is an appropriate location for new housing development and this represents a significant material consideration which weighs in favour of the application being granted.**

**The contribution of the development to addressing on-going unmet affordable housing need across the County and in the town.**

- 7.22 Powys' Local Housing Market Assessment Update 2014 (LHMA) (Extract provided in Appendix 9), identifies a need for 765 affordable dwellings over the first 5 years of the LDP period which equates to 153 dwellings per year. The LHMA identifies that Llanidloes and Newtown have an annual affordable need of **30 social rented and intermediate dwelling as per year**. The current Powys Common Housing Register shows that in Llanidloes there are **124 households on the housing waiting list**. With the UDP and emerging LDP proposing almost no deliverable housing site in the short or medium term, the need for affordable housing both across the County but more specifically within Llanidloes will simply not be addressed and the unmet need will simply worsen unless deliverable sites are brought forward.
- 7.23 The application site has the potential to accommodate approximately 96 dwellings over a 5-year period. This application proposes that 10 of the proposed dwellings will be affordable housing in line with the Council's new policy that 10% of homes in North Powys are provided as affordable. Whilst it is accepted that this will not in any way resolve the broader unmet housing need for this area, it will go some way to meeting the 30 dwellings of affordable housing that are required per year in the area. **This represents a significant material consideration.**

**The whole of the application site is a deliverable site where as there is uncertainty over the deliverability of the other allocations in the LDP.**

- 7.24 In the plan period, in Llanidloes, the UDP delivered only 57 out of 155 dwellings and the LDP allocates sites capable of accommodating just 152 dwellings. Although large by local standards this site does not even cover the shortfall in dwellings which were not delivered by the UDP. Across the combined UDP and LDP plan periods (2001-2026) just over 200 new properties are allowed for by the LPA. Even if all of the emerging LDP allocations are delivered over the plan period, **this would appear to be inadequate for an Area Centre.**
- 7.25 Notwithstanding the serious concern about the lack of allocated housing sites in the town, there is uncertainty surrounding the deliverability of the emerging allocated sites. The Council's own Joint Housing Land Availability Study 2015 (JHLAS) (extract provided at Appendix 7) confirms that **very few, if any, dwellings are proposed to be constructed in the town within the next 5 years.** Aside from the partial allocation of the application site, the emerging LDP does not seek to allocate any 'new' sites which have not previously been available to the market. There is therefore grave concern that the LDP is not identifying deliverable housing land for development over a plan period.
- 7.26 In contrast, the **whole of the application site is available for development immediately** upon the grant of planning permission and approval of a subsequent reserved matters application. The application is supported by a comprehensive suite of technical supporting documents which demonstrate that the site is not subject to any significant constraints which cannot be reasonably overcome. **The deliverability of the site set against the uncertainty surrounding the deliverability of other sites in the town is a significant material consideration which weighs heavily in favour of the application.**
- 7.27 By way of conclusion in respect of the principle of development, the application must be considered in accordance with the development plan unless material considerations indicate otherwise. It is acknowledged that some of the application sites currently lies outside of the settlement boundary in terms of the development plan. However, there are a significant number of material considerations which weigh heavily in favour of the application. It is clear that there exists a **serious shortfall in the Councils required 5-year housing land supply** both across the County and at a local level. In accordance with PPW TAN1, **the LPA must give serious consideration to applications such as this proposed which will increase the supply of housing land.**
- 7.28 A further significant material consideration is that **the development will also deliver approximately 10 affordable dwellings** in an area with a significant unmet demand for affordable housing and assist some of the 124 households on the housing waiting list.
- 7.29 The **site is deliverable** within the next 5 years whereas there are serious doubts concerning the deliverability of the existing UDP and emerging LDP allocations in the short to medium term.

**The impact of the development on the character and appearance of the surrounding area.**

- 7.30 The site is located at the south eastern edge of the settlement boundary of Llanidloes. Part of the site is included within the previously adopted development plan and the entire site was included within the plan prior to that i.e. the MLP 1995. We echo what has been said previously in this document within the MLP preamble to Inset Map 62. "This area is relatively free of the physical constraints that hinder development elsewhere in the town.... This area represents the town's largest housing development opportunity and will supply a range of house types". We are of the opinion that the site is very well related to the existing settlement.
- 7.31 This application is supported by a Landscape & Visual Appraisal prepared by Lingard Styles. This provides a specific assessment of the potential landscape and visual impact of the proposed development.
- 7.32 The Assessment recommends that the protection, retention and enhancement of existing mature landscape features is a key feature of the landscape and visual mitigation.
- 7.33 The application is also supported by an Outline Landscape Mitigation Plan included within the LVA reference above. This will reinforce the existing mature landscape framework of hedgerows which will visually contain the development within the local and wider landscape as well as providing attractive well-functioning external spaces for the residents of the development.
- 7.34 The Assessment concludes as follows:
- That the overall effects on the surrounding landscape will not be significant;
  - There will be some moderate but localised changes to topography to accommodate the new access;
  - Residential receptors are amongst the most sensitive to visual effects but no significant visual effects have been identified when mitigation planting has become established;
  - There would be no significant visual effects on the amenity of the users of the local footpath network or areas of Open Access Land at any stage of the development;
  - No designated landscaped have been identified as being affected by the proposed development;
  - The overall conclusion is that this development proposal, complies with the raft of applicable nation, regional and local planning policies related to the landscape and the development would be acceptable in landscape and visual terms.
- 7.35 It is also necessary to consider not only the landscape and visual impact of the proposed development, but also the degree to which the development in the immediate locality. Although layout, amount, scale and landscaping are all matters which are reserved for consideration in any subsequent reserved matters application, the indicative layout which accompanies the application provides an indication of the amount of development which could be provided by the development of the application site.

- 7.36 In terms of planning policy, PPW (para. 9.1.2) advocates that LPA's should promote *"the most efficient use of land"* whilst paragraphs 4.7.2 and 9.3.4 encourage higher density development in accessible locations and to help conserve land. Whilst ensuring due regard for nature conservation, residential amenity and open space, there is therefore a duty on the LPA to secure the most efficient density of their sites which are identified for development in emerging LDP. The UDP does not stipulate a specific minimum density of development, however, for the allocated sites in order to calculate site capacities.
- 7.37 In the emerging LDP, Policy H3, Housing Density states that in towns and large villages, development density should be above 25dph in order to *"ensure the best and most efficient use of land, maximising the development potential of sites whilst conserving land resources for other uses."* By encouraging higher density, the Policy also seeks to *"promote the development of smaller homes to meet housing needs generated by decreasing household size"*.
- 7.38 The general scale and density of the development is in general accord with nearby residential development. The table below compares the density of development of the proposed development with nearby estates:

Table 11: Density Comparison	
Housing Estate	
Proposed development	22.33 (dph)
Dolgwenith	23.5 dph
Tan- y- Bryn	27.5 dph
Parc Derw	15 dph

- 7.39 As illustrated in Table 11 above, the indicative layout provides a density of 22.33 dph over 4.3 hectares of the site. Whilst it acknowledged that this falls below the guideline 25dph suggested by the UDP and the 25+dph advocated by the emerging LDP Policy H3, this relatively low density is a reflection of the fact that the site is sloping and that the indicative layout shows significant areas of landscape planting in accordance with the Outline Landscape Mitigation Plan which seeks to provide landscape mitigation to limit visual impact of the development on nearby residential properties and the wider landscape.
- 7.40 In comparison to the adjacent estates, the application site is in alignment with the density of housing in the area and so is entirely suitable for approval.

- 7.41 On this basis, it is considered that although layout, amount, scale and landscaping are all matters which are reserved for consideration in any subsequent reserved matters application, the indicative layout demonstrates that the potential density of this site and its form, scale, massing and urban grain are generally reflective of the existing nearby development in Dolgwenith.
- 7.42 Taking all of the above into consideration, the density of development as illustrated on the indicative site layout is therefore considered to strike the correct balance between securing the most efficient use of the site in accordance with PPW, the development plan and emerging LDP policy and whilst also seeking to minimise the impact on the character of the landscape and to accord with the prevailing density of existing nearby development.
- 7.43 On this basis, it is considered that **the proposed development will not have an unacceptably detrimental impact upon the character and appearance of the surrounding landscape area nor on the adjacent areas of existing residential development.**

#### **The impact of the development on the residential amenity of surrounding properties**

- 7.44 The application site adjoins the rear gardens of between 6 and 7 properties to down one flank and the same number to Dolgwenith. In relation to Tan- y- Bryn there is a green buffer strip which provides for considerable distance between those existing properties and the site in question. The southern boundary of Dolgwenith such as the application site but it is separated from such by mature landscaping. The remaining houses within the residential estates do not have any physical connection to the application site.
- 7.45 When considering whether proposed development will have an impact on residential amenity of existing properties, the LPA must consider whether there will be any impact by the way of overshadowing and overbearing and whether there will be any reduction in privacy due to facing habitable room windows. In case of privacy, it is generally accepted that facing habitable room windows between existing and proposed dwellings should be separated by at least 21m. In this case, although the exact location of the proposed dwellings will be determined in any subsequent reserved matters application, the indicative layout illustrates that there will be **significant separation distances well in excess of 21m** to existing dwellings at Tan- y- Bryn and Dolgwenith lies some 70m from the site boundary.
- 7.46 In addition, the indicative layout and the Outline Landscape Mitigation Plan both indicate the retention and reinforcement of existing trees and landscaping along the boundary with Tan- y- Bryn and Dolgwenith. The existing landscaping of the single width access track to the sporadically placed dwellings to the south east of the application site will be maintained and reinforced in order to minimise visual impact on these other more isolated properties. The indicative layout and Outline Landscape Mitigation Plan also illustrate significant areas of new strategic landscaping so as to minimise wider landscape impact and to minimise the visual impact of the development on properties along Tylwch Road.
- 7.47 Internally, the layout has been designed to achieve appropriate amenity standards with each dwelling provided with ample external amenity areas and

parking provision which is well related to the relationship, both internally and externally on the neighbouring residential context.

### **The acceptability of the development in terms of highways capacity and safety**

7.48 The application is made in outline with means of access to be considered at this stage rather than reserved matters. The application is therefore accompanied by the following plans and documents:

Transport Statement - Entran

7.49 The Transport Statement considers the capacity of the local and wider highway network to accommodate traffic generated with the development. Based on an approximate development of 96 dwellings the Transport Statement concludes that the development could generate up to 56 vehicle trips (two-way) in the morning peak period and up to 60 vehicle trips (two-way) in the afternoon peak period.

7.50 The capacity analysis indicates that **the existing and proposed transport network has sufficient capacity** to accommodate the anticipated level of demand generated by approximately 96 no. dwellings.

7.51 There can therefore be **no objection to the development in terms of impact on the highways network.**

7.52 Vehicle and cycle parking provision will be a matter to be considered in any subsequent reserved matters application. However, the indicative layout illustrates car parking provided in accordance with CSS Wales Parking standards, i.e. 1 space per bedroom up to a maximum of 3 spaces per dwelling. In respect of visitor parking, this must be provided at a rate of 1 space per 5 dwellings. The internal road layout has been designed to be 6m wide which, in accordance with Manual for Streets (ref. Figure 7.1), is wide enough for a car and a large vehicle such as a refuse vehicle or delivery lorry to pass. On this basis, visitor parking can be accommodated on-street. In terms of cycle parking, each proposed dwelling is provided with ample private amenity space which can accommodate either garages or garden sheds which will provide space for secure storage of bicycles.

### **Other material considerations**

#### **Foul and surface Water Drainage**

7.53 Pre-application consultation with Severn Trent Water has established that there is **sufficient capacity in the foul sewerage system to accommodate the proposed development.**

7.54 In regards to surface drainage, it is envisaged that surface water will be attenuated on-site before being discharged at a controlled rate into various watercourses. Surface water from the current undeveloped site flows off the site at an uncontrolled rate, whereas once developed, surface water flows from the site will be controlled. On this basis, the development will likely reduce the risk of flooding downstream of the site.

## Flood Risk

- 7.55 Appendix 10 includes an extract of the Development Advice Map of Planning Policy Wales Technical Advice Note 15: Development & Flood Risk which demonstrates that the whole of the application site lies within Zone A: Considered to be at little or no risk of fluvial or coastal/tidal flooding.

## Trees

- 7.56 The application is supported by an Arboricultural Report from Future Arbor. The indicative site layout has been prepared to take into account the root protection areas of all existing trees within the application site so that those that are in good health are retained as part of the development. In the main all existing hedgerows will be retained. The retention of the existing trees and hedgerows is seen important in order to mitigate any visual impact of the development on the immediate and wider landscape and to provide screening of the development from nearby residential properties. **The proposed development of the site will not therefore result in the any significant loss of any trees or hedgerows.**

## Ecology

- 7.57 The application is supported by a Preliminary Ecological Assessment undertaken by Mid Wales Ecology. The report concludes that the 'Potential for breeding amphibians is considered to be low; reptiles, foraging badger within the work area is considered to be moderate; presence of otter and dormouse is considered to be low; potential for roosting bats and nesting birds is considered high. Avoidance, mitigation measures and biodiversity enhancements are set out.' Given the above there is **no ecological reason why the site cannot be developed for residential purposes.**

## Conclusion

- 8.1 This Planning Statement accompanies an outline planning application for residential development and associated works on for residential development, vehicular access and Infrastructure on the land adjacent to Dolgwenith and Tan- y- Bryn, Llanidloes.
- 8.2 The site, which lies partially within and partially without the settlement boundary of the LDP works well with the existing settlement pattern of Llanidloes. Given this we are of the opinion that the site is an appropriate location for housing development given that it is a logical extension to the settlement pattern.
- 8.3 In terms of the principle of development, the application must be determined in accordance with the development plan, unless material consideration indicate otherwise. In this case, **there are significant material considerations which weigh heavily in favour of the grant of planning permission** as follows:
- **The Council only have 2.2 years of housing land supply** and PPW TAN1 states that **the need to increase housing land supply should be given ‘considerable’ weight in the determination of planning application**, provided that all other material considerations are adequately satisfied.
  - Upon expiry of the UDP on 30<sup>th</sup> June 2016, the Council now has **no housing land supply**.
  - **The UDP has singularly failed to deliver any significant housing development over the plan period** leading to a demonstrable **under supply of housing** which is forcing up house prices and pricing young couple and young families out of the market.
  - The application proposes **10% affordable housing** in an area with a significant unmet need and demand for affordable housing.
  - The LPA has failed to address the past shortfall in housing delivery in the emerging LDP as it has failed to identify sufficient housing land to serve the needs of the ‘Area Centre’ and **many of the sites that have been identified are subject to serious concerns regarding their deliverability**.
  - Based upon a review of the latest JHLAS and a review of the UDP sites, **without planning permission being granted it is feasible that no new houses will be constructed in the town over the next 5 years**.
  - **The application site is deliverable as it is not subject to any significant constraints** and is **available for development immediately** upon the grant of any subsequent reserved matters application.
- 8.4 The application is supported by a comprehensive set of supporting plans and documents which all demonstrate that there are no significant constraints which would prevent the development of the site for residential use.

- 8.5 In particular, access to the site can be achieved without detriment to the existing highway network or on highway safety. All other matters are reserved for consideration in any subsequent reserved matters application, but not withstanding this, the illustrative layout indicates that the site can accommodate approximately 96 dwellings at a density of development that is respectful of nearby residential development and the need to make the best use of development land.
- 8.6 It is for these reasons that Powys County Council is respectfully requested to grant consent for the development proposed.