

Carmarthenshire County Council

Local Development Plan 2018 – 2033

Second Deposit

Candidate Site Supporting Statement

**Land between 26 and 54 Parklands Road,
Penybanc, Ammanford**

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1. Introduction

This document is provided in support of our submission that seeks the allocation of land in our ownership for residential development in the new, Revised Local Development Plan (Revised LDP).

The detailed appraisal that has been prepared in accordance with our understanding of the relevant national and local planning policies and guidance seeks to demonstrate that the subject land meets all of the relevant criteria for inclusion as an allocated site within the new Revised LDP.

2. Planning Policy and Guidance

The national land use policies for Wales are set out in the Welsh Government publication Planning Policy Wales, Edition 11 (PPW) that principally requires that planning policies, proposals and decisions must promote sustainable development and support the well-being of people within their communities. New development has to be sustainable and improve the social, economic, environmental and cultural well-being of Wales.

PPW, that is supported by a series of focussed, topic based Technical Advice Notes (TANs) and other key legislation such as the Planning (Wales) Act 2015, and the Well-being of Future Generations (Wales) Act 2015, conveys that *'Local Development Plans should set out a vision for how places are expected to change in land-use terms to accommodate development needs over the plan period'*; that *'Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities'* and that *'The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all.'*

Detailed guidance with regard to the preparation of development plans is provided in the Development Plans Manual, Edition 3, (DPM) March 2020. The DPM identifies the key requirements in the consideration of a candidate site. These are set out as the candidate site must:

- be at a sustainable location;
 - be readily available;
 - be free from physical constraints such as access, ground condition; biodiversity or flooding issues
 - whether the site has any relevant planning history; and,
-
- if there are any barriers to the delivery of the site the candidature must include a detailed summary as to how the barriers shall be overcome.

Locally, the current Carmarthenshire Local Development Plan (LDP), adopted in December 2014, advocates a hierarchical approach to new residential development, namely, Growth Areas, Service Centres, Local Service Centres and Sustainable Communities.

The principal status of the Growth Area settlements reflects their high population levels and that these settlements are well served by the necessary facilities, services and public transport provision extending beyond their localised catchments that are vital to supporting the principles of sustainability and are capable of accommodating a proportionally high level of growth.

The LDP identifies three Growth Areas centred on the principal towns of Carmarthen, Llanelli and Ammanford respectively. The Ammanford/Cross Hands Growth Area, referenced GA3 within the LDP, is described as performing a key role within the area due to its strategic location on the M4 corridor and at its role at the hub of the Amman and Gwendraeth Valleys. The Ammanford/Cross Hands Growth Area is the second largest settlement in population terms within the LDP.

The LDP conveys that the topographical characteristic of GA3, comprising of two centres, Ammanford and Cross Hands, along with a number of interrelated, smaller settlements of varying scale and function, has a direct bearing on the suitability for growth with a balanced decision having to be taken on the ability of any particular settlement to accommodate new growth, without resulting in harm to the character of the area or community.

LDP polices AH1 – AH3 detail the need for new residential development to contribute towards affordable housing in the locality. New developments comprising 5 or more dwellings are required to provide an on-site accommodation, while smaller developments require a relevant financial contribution towards the provision of affordable housing in the area.

The Council's intention to locate new development primarily within the identified growth areas reflects the national land use planning aim for sustainable development in well serviced areas to improve the well-being of the local population.

The Second Deposit Revised LDP, while continuing to identify a settlement hierarchy offers a new spatial strategy, with a strategic approach aimed at locating new development at locations that are both deliverable and sustainable. The Revised LDP again identifies key strategic growth areas focused on six key areas or 'defined clusters', three of which are again centred at Carmarthen, Llanelli and Ammanford/Cross Hands.

The continued approach in the Revised LDP again clearly reflects the national theme of 'place making' embedded within PPW that new residential development should seek to sustain and enhance existing communities. This guiding principal shall ensure that the future growth of communities shall result in built and natural environments where people can sustainably live, work and spend their leisure time.

Proposed Strategic Policy SP3 aims to secure that key place-making responsibility through the provision of new homes at sustainable locations through the allocation of sites at established settlements in a hierarchical framework of Principal Centres, Service Centres, Sustainable Villages and Rural Villages.

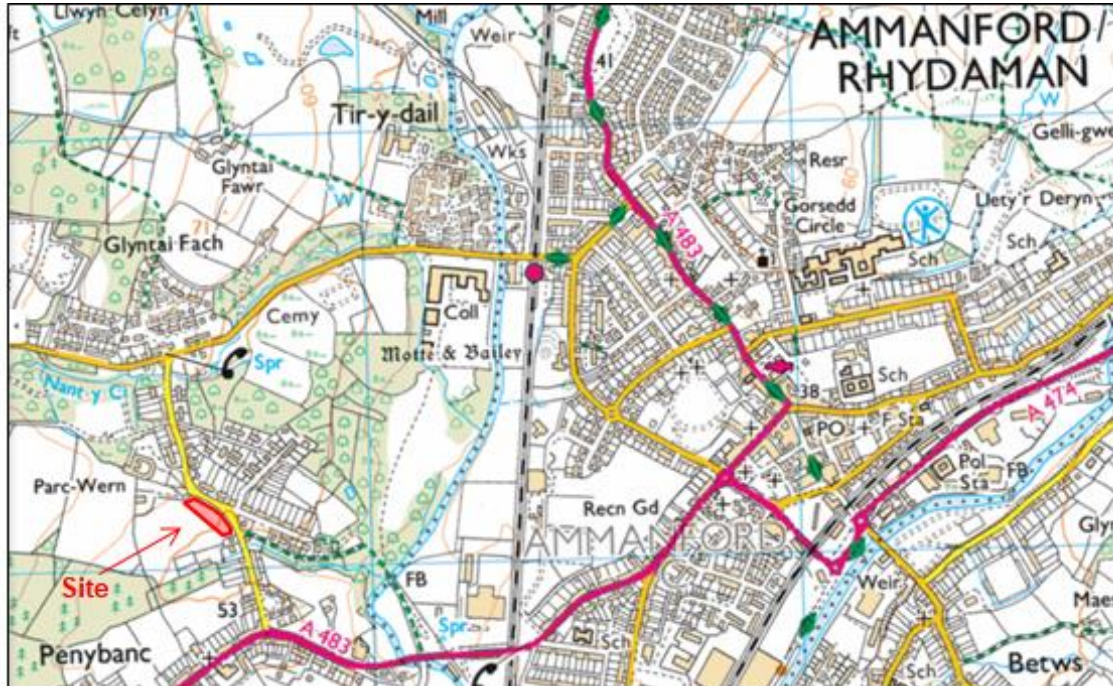
Strategic Policy SP4 further conveys the Plan's strategic aim of providing new homes in a sustainable manner through the allocation of sites in established settlements; supporting windfall residential development on appropriate sites within settlements; and the provision of appropriate affordable housing opportunities to meet an identified local need.

Proposed policy AHOM1 maintains the Council's commitment to the provision of affordable housing as part of any new residential development.

3. Candidate Site

3.1 Location and Description

Our candidate site is located along the western flank of Parklands Road, Penybanc, Ammanford as shown on the location plan below.



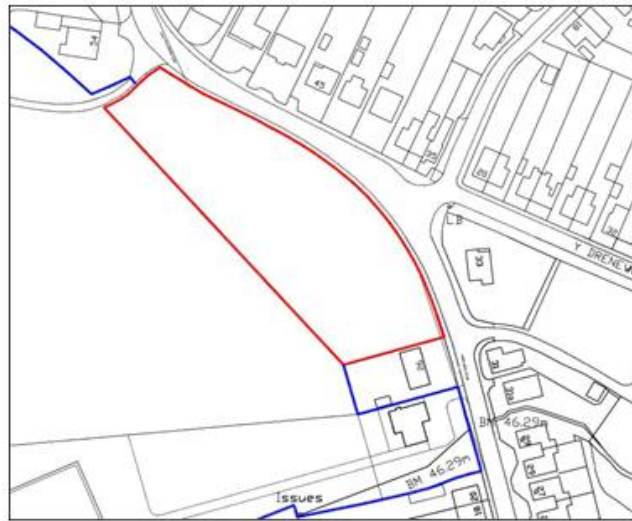
The site is located a short walk (250 metres) from the social, retail, commercial and recreational facilities of the community located in close proximity to the junction of Parklands Road with Penybanc Road (A483). The site is also within walking distance of Parcyrhun Primary School, Amman Valley Comprehensive School and higher education at Coleg Sir Gar, Ammanford Campus.

Bus-stops at the A483 junction provide a regular, every 30 minutes, service to Ammanford, Llandeilo and Swansea. Similarly, bus stops at the junction of Parklands Road with Dyffryn Road (at the telephone kiosk symbol on the plan), again within convenient walking distance (350 metres) provide regular services to Ammanford, Carmarthen, Cross Hands and the communities of the Gwendreath Valley.

Directly opposite the south-eastern corner of the site is a public footpath (51/21) that provides for a pleasant, woodland walk to Ammanford.

The convenient public transport, walking and cycling connectivity to Ammanford and the wider area significantly increases the range of services, amenities and facilities readily available for Penybanc residents.

The candidate site lies between the bungalow, number 26, to the south and our agricultural field access immediately adjacent to the house number 54 to the north, with a mix of houses (35 – 37) and bungalows (33, 41 – 51) opposite.



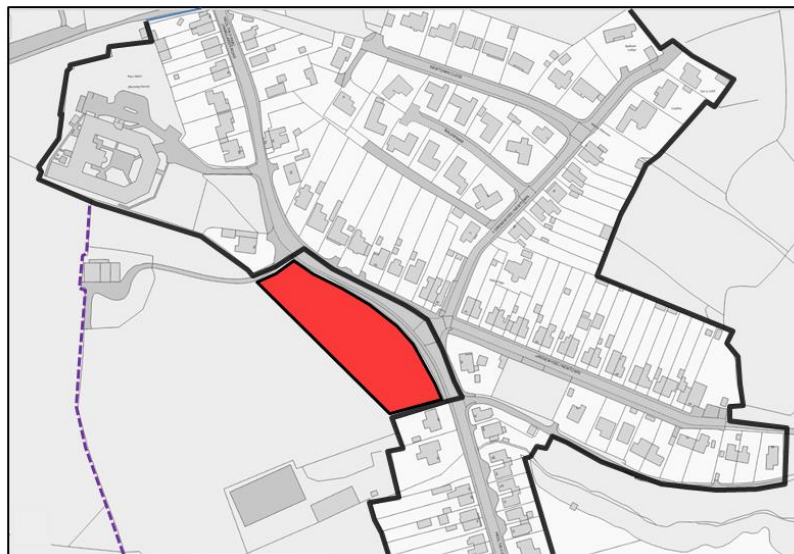
The land that is laid to grass slopes gently downward from north to south with the road frontage, northern and southern boundaries clearly delineated by stock proof fencing.



3.2 Context

Penybanc principally extends in a linear form along the A483 Penybanc Road and Parklands Road with an established group of housing directly opposite the candidate site at Newtown, Newtown Close, Waunfawr and Park Mill Road.

As indicated in red on the Revised LDP extract plan below, our candidate site is bounded on three sides by the residential development limits as delineated in both the current LDP and the proposed Revised LDP.



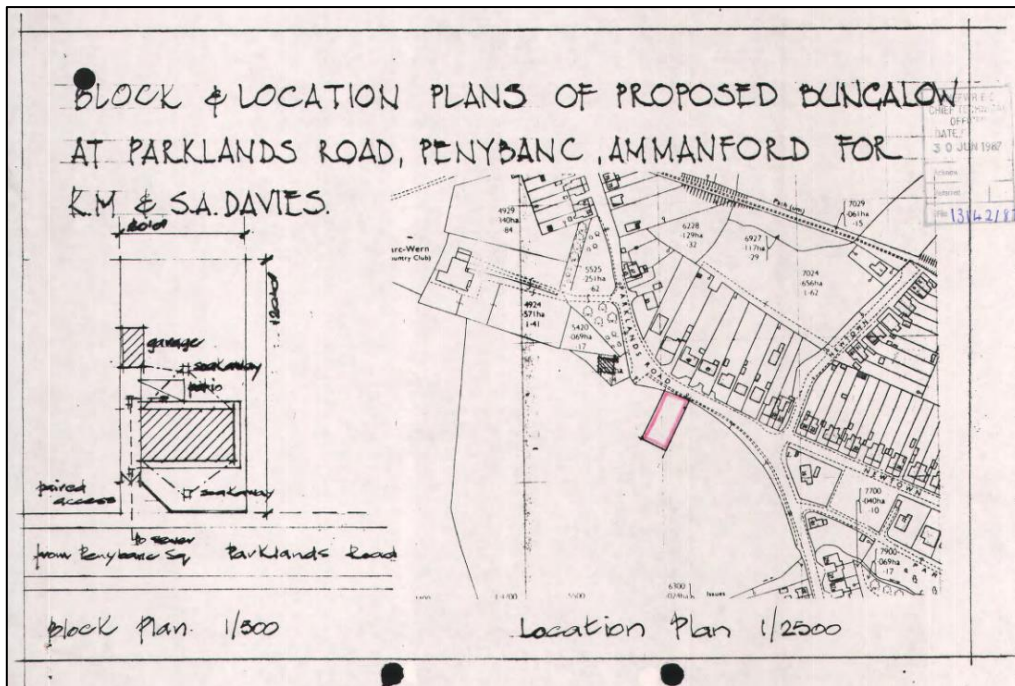
The site lies outside of the area within which a financial contribution would be required towards funding the implementation of specific marsh fritillary butterfly habitat management initiatives, the boundary of which is indicated by the dashed purple line in the plan above.

With established residential development immediately to the north, south and east, the candidate site represents a logical location for infill, residential development.

3.3 Planning History

During the 1960s and 1970s a substantial acoustic bund associated with the historic opencast mining of the area existed along the entirety of the candidate site. That bund resulted in a significant sense of enclosure along the street scene.

Full planning permission (P6/13142/87) was granted in July 1987 for a bungalow and garage. An extract of the approved block and location plan is provided below.



3.4 Residential Development Proposal

We anticipate that the site would be developed in a linear arrangement of bungalows or dormer bungalows that would positively respond to both the site and the surroundings. To ensure that the new development is sympathetic to the character of the existing housing, the alignment, design and massing shall reflect the form of the existing nearby properties.

The illustrative plan below indicates how the site could potentially be developed for a maximum of 9 detached residential dwellings.



The proposed development shall provide for south/south west facing gardens that shall seek to maximise the potential for solar energy and contribute positively to the well-being of the future occupants in that the dwellings shall have private outdoor amenity areas that shall be available for the maximum periods of time throughout the year.

With the exception of the southernmost plot that would be served by an individual private drive, vehicular access would be achieved by means of paired private drives, directly off Parklands Road.

Although unclassified, Parklands Road where it fronts the site has a carriageway width of 7m, with a grassed verge and 1.7 m wide footway along the site frontage. At the opposite side of the carriageway the footway fronting the existing bungalows is 1.9m in width.

The alignment of the highway, together with the wide footway along the site frontage, shall duly facilitate the required visibility splay for each new vehicular access.

We understand that given the limited scale of the proposal along with the proximity to existing facilities there shall be no requirement for an area of on-site, formal open recreational space. To meet the Council's requirements in terms of affordable housing we understand that whereas the current LDP requires that one affordable dwelling (10%) would have to be made available and secured by planning obligation for occupation by an eligible household whose needs are not met by the open market, the Revised LDP requires the relevant financial contribution towards affordable housing shall have to be provided, that again would be secured by planning obligation.

While the schematic layout proposes what is considered to be a sympathetic form and density of development, we acknowledge that the final number, design and layout shall be established through the submission of a full planning application.

3.5 Infrastructure

The candidate site is at a location well served by mains water, gas, electricity, public sewerage and fast fibre broadband to the home.

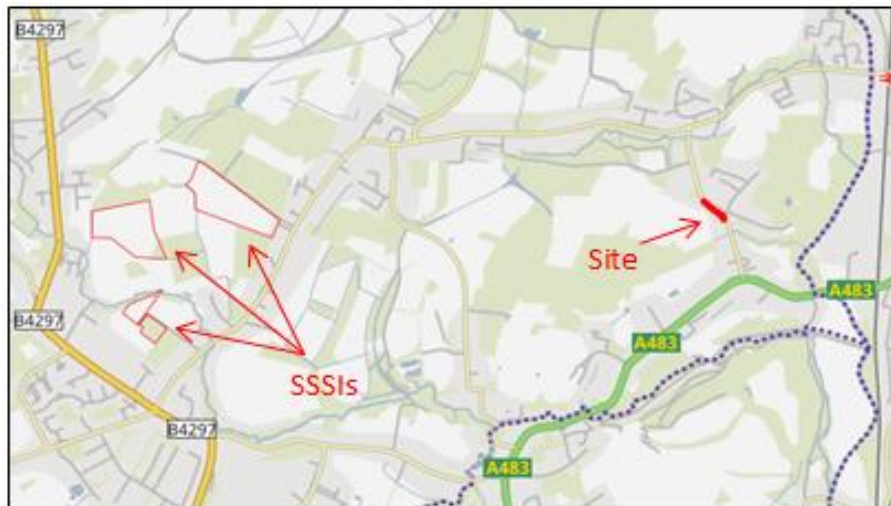
Having due regard to disposal of surface water, there are a number of options available to facilitate the provision of a sustainable urban drainage system.

3.6 Ecology

As evident in the photographs provided at 3.1 Location and Description above, the candidate site is actively used and managed for the purposes of agriculture. The site is part of a larger enclosure of improved grassland, subject to the usual nutrient practices with the road frontage defined by a timber post and rail fence.

Other than a very small part in the south-eastern corner being designated grade 3b, 'moderate quality agricultural land', the majority of the land is grade 5, 'very poor quality agricultural land'.

The candidate site does not form part of any local or national nature conservation designation, with the nearest Sites of Special Scientific Interest (SSSI), being the group of fields known as Caeau Blaenau Mawr and Caeau Capel Hendre located 2km to the west.



Having due regard to the above, it is considered that the site has a very low biodiversity value and that the residential development of the site shall have no detrimental impact upon any SSSI.

3.7 Environmental Considerations

The candidate site is not located within an area where residential development would cause concern with regard to river phosphate levels or within any of the categorised flood risk areas detailed in the Development Advice Maps published by National Resources Wales. The residential development of the land shall therefore not be at any risk of flooding.

Being in agricultural use the greenfield land has no ground contamination issues.

3.8 Historical Assets

There are no listed buildings or scheduled ancient monuments within or adjoining the candidate site. Similarly, there are no listed buildings within the community of Penybanc or a designated conservation area within either Penybanc or Ammanford. The residential development of the candidate site shall therefore not have any detrimental impact on any historical asset or the setting of any such asset.

3.9 General

It is noted that the sequential numbering system adopted by the Council allows for 9 properties between the bungalow, 26 Parklands Road and the house number 54 at the southern and northern boundaries of the site.

4. Viability and Deliverability

4.1 Financial Viability

National planning policy requires that all land use allocations are both financially viable and deliverable to ensure that plan making and decision making viability strikes a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission.

Though a detailed analysis of the financial viability is difficult at this initial stage due to the absence of such things as a comprehensive site survey and full engineering details, the following high level appraisals with due regard to both the current LDP and Revised LDP have been undertaken. The submitted data has been informed by discussion with established agents and professionals to ensure that the figures accurately reflect the local market benchmark land and property values at the present time.

The costs are based upon:

- Three bedroom dwelling – 130m²
- New three bedroom dwelling - £280,000
- Construction cost of £1,500 per square metre
- Utility Connections to include water, electric, gas and foul water
- Professional Fees (including Design, Planning, Building Regulations, Estate Agents, SAB & LABC warranty) at 8% of the construction fee
- Developer's profit based upon the RICS guideline of 15%

Current LDP - 9 Dwellings inclusive of 1 on-site Affordable Dwelling

Costs	<i>No. of dwellings</i>	<i>Cost per dwelling/m²</i>	<i>Total</i>
3 bed dwellings	8	1500	1,560,000
Affordable Dwelling	1	Built to 'break even'	0
Utility Connections		5000	40,000
Professional Fees		-	124,800
		Total	1,724,800
Sales	<i>No of dwellings</i>	<i>Value</i>	<i>Total</i>
3 bed dwellings	8	280,000	2,240,000
Affordable Dwelling	1	Built to 'break even'	0
		Total	2,240,000
Developer's profit			336,000
		Residual Land Value	179,200

Revised LDP - 9 Dwellings with the relevant Affordable Housing financial contribution

Costs	<i>No of dwellings</i>	<i>Cost per dwelling/m²</i>	<i>Total</i>
3 bed dwellings	9	1500	1,755,000
Affordable Housing	-	41.98	49,117
Utility Connections		5000	40,000
Professional Fees		-	140,400
		Total	1,984,517
Sales	<i>No of dwellings</i>	<i>Value</i>	<i>Total</i>
3 bed dwellings	9	280,000	2,520,000
		Total	2,520,000
Developer's profit			378,000
		Residual Land Value	157,483

Both of the in-principle scenarios above demonstrate that the residential development of our candidate site would be financially viable, while also capable of providing the relevant contribution towards affordable housing in the community.

4.2 Deliverability

With the proposed residential development being financially viable, there are no ownership or physical constraints to prevent the delivery of the candidate site.

The site would, on adoption of the Revised LDP, be immediately available for development with its delivery, including the community affordable housing benefit, anticipated to be completed in the short term, within the first 5 years following adoption of the Plan.

5. Comment on the Previous Concerns of the Council

Although the Council previously (SR/004/009) considered the candidate site to be acceptable in terms of the location of future growth presented in its preferred strategy, both the initial and detailed site assessment, sustainability appraisal and habitat regulation assessment, the site was not recommended to be taken forward at that time due to two concerns, namely that it was considered that there is more suitable land available for residential development and that the development of the site would be likely to result in ribbon development.

5.1 'More suitable land available'

It is reasonably assumed that the land referred to is that at Tirychen Farm, Dyffryn Road, Ammanford, Revised LDP reference PrC3/h4, an allocation rolled over from the previous development plan, where Outline planning permission (P6/16576/89) in respect of the residential development of the land was initially granted in April 1990, having expired three years later.

Full planning permission (P6/305/95) was granted for 141 houses and bungalows in February 2008 that expired in February 2013.

Outline planning permission (E/21663) was granted in October 2014, renewed by means of the Variation of Condition consent (E/38686) approved October 2019. It would seem that this most recent permission that proposed 289 dwellings expired in October 2021 and as such there is no current planning permission for the development of that land.

Aside from the key question whether there is a valid consent in place, the deliverability of the site allocated for 250 dwellings in the LDP and 150 dwellings in the Revised LDP is extremely doubtful.

Each permission that has been granted has been subject to numerous conditions and a planning obligation. The number and requirement of the conditions such as significant highway improvements including a new bus layby, along with the financial and physical requirements of the planning obligation (affordable housing, cemetery car park extension, six-figure highways and education contributions, detailed woodland management scheme) render the development beyond the realm of local building contractors while the national, volume housebuilders have not shown any interest in the site during the 33 years since permission was first granted, instead focussing their attention on the M4/A48 corridor, more specifically at sites in and around Cross Hands.

An online search reveals that the land at Tirychen is not presently being marketed which would indicate that the site was merely being land-banked.

The Council has expressed its own concern with regard to the deliverability of the allocation in the report to Full Council in January 2018 that adopted a traffic light system in respect of the viability and deliverability of the proposed residential land allocations within the Revised LDP. The land at Tirychen Farm was categorised as red, *'no indication of progress towards delivery'*.

In the absence of a valid planning permission, it would seem extremely questionable whether a new submission at what is a large scale, rural, natural landscape would be considered acceptable in the context of the current biodiversity objectives.

The potential delivery of the land at Tirychen, that would appear to require a new planning permission, is markedly uncertain.

5.2 'The development of the candidate site would be likely to result in ribbon development'

In the absence of any specific reasoning why the allocation of our land would be 'likely' to [not 'shall'] result in ribbon development, we understand that ribbon development is usually deemed to be unacceptable as such linear development along highways can result in urban sprawl or an unacceptable intrusion into the countryside; the inefficient use of resources; hinder access to and/or the development/use of the land to the rear; and/or result in the coalescence of settlements.

The candidate site lies within a well-established area of housing with the most recent residential development within Penybanc being the bungalows at Waunfawr and the houses at Newtown Close. As such the residential development of the site shall not result in an urban sprawl or an unacceptable intrusion into the open countryside and would be more appropriately characterised as an infill development within the established built fabric of the community. The site is well served by the necessary services infrastructure and as such shall not therefore result in the inefficient use of resources.

Residential development of the site shall not hinder or impede in any way the continued access to the land to the rear that is served by an existing access immediately to the north of the site and also from the rear of our home to the south.

Being located within a residential area between two houses the provision of housing at the site shall not result in the coalescence of any neighbouring settlements.

Should the Council's concern relate to the loss of an area of a natural landscape within the local built environment, the woodland adjacent to 54 Parklands Road to the north, only 10 metres from the candidate site, is the subject of a Tree Preservation Order (CCC TPO E20). That TPO fronting Parcwrn Care Home shall ensure that a formally safeguarded natural interruption to the street scene is permanently maintained.



Having due regard to the above, it is considered that the residential development of the site shall not result in ribbon development.

6. Conclusion

Our candidate site that has housing on three sides and all mains services including fast fibre broadband readily available represents a logical form of infill development at a sustainable location, being only a short walking distance to the community social, retail, commercial, and recreational facilities and also to public transport that regularly links Penybanc with the neighbouring hub of Ammanford and the wider area, further increasing the range of services and facilities available to future occupants.

The land that has in part previously benefited from the grant of a residential planning permission is free from any constraint in terms of access, biodiversity, ground condition or flooding.

In terms of its sustainability credentials, the simple, efficient layout of the development shall require minimal road construction; prioritise the solar orientation of houses and gardens; provide for a sustainable urban drainage system with features such as permeable surfaces where possible, together with a landscaping scheme that would significantly improve and enhance the existing biodiversity through the planting of indigenous species. The location of the site encourages sustainable transport use through convenient, close access to the local bus and train service along with direct access opposite the site to an attractive public footpath that affords easy walking connectivity to the town of Ammanford, and also to the established local cycle path network.

With significant doubt around the deliverability of the only, longstanding allocation in the locality our candidate site would be immediately available, with no uncertainty in terms of its viability or deliverability. Although modest in scale, the allocation of our site for residential development would represent both a sound option to address the likely deficit in provision and offer a significant contribution to the housing growth strategy of the area.

We respectfully contend that the robust information provided in this appraisal demonstrates that the designation of the land for residential development would be consistent with the key objectives of both national and local guidance and policy objectives in that the candidate site is at a sustainable location, viable, readily available and free from any physical or environmental constraints.