



**ALTERNATIVE SITE SUPPORTING STATEMENT**  
**FOR**  
**REPLACEMENT CARMARTHENSHIRE LOCAL DEVELOPMENT**  
**PLAN 2018-2033**

**LAND OFF WATERLOO ROAD, PENYGROES, CARMARTHENSHIRE**

On behalf of  
Mrs K Fakes, Mr D James, Mr E Roberts and Mr G Jones

**Our Ref:** 1199.a  
**Date:** March 2023  
**Prepared by:** JDE

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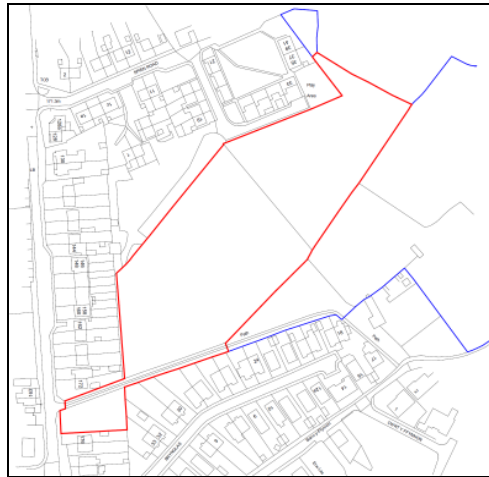
## 1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd has been instructed by Mrs K Fakes, Mr D James, Mr E Roberts and Mr G Jones (the Land Owners) to prepare and submit an Alternative Site Report for the allocation of land off Waterloo Road, Penygroes for the purposes of residential development in the forthcoming replacement *Carmarthenshire Local Development Plan*.
- 1.2 This report has been prepared in line with the Authority's published site assessment and selection documents. The contents of this report therefore address each point raised within these documents as well as ensuring that it complies with regards to the guidance and requirements of *Planning Policy Wales (Edition 11)* when it comes to the preparation of development plans and the allocation of land for residential purposes as part of them.
- 1.3 The contents of this report therefore provide a comprehensive case for the allocation of the land for residential development purposes, and it should also be read in conjunction with the accompanying information and indicative drawing package, as well as a sustainability assessment undertaken in-line with the Authority's requirements.

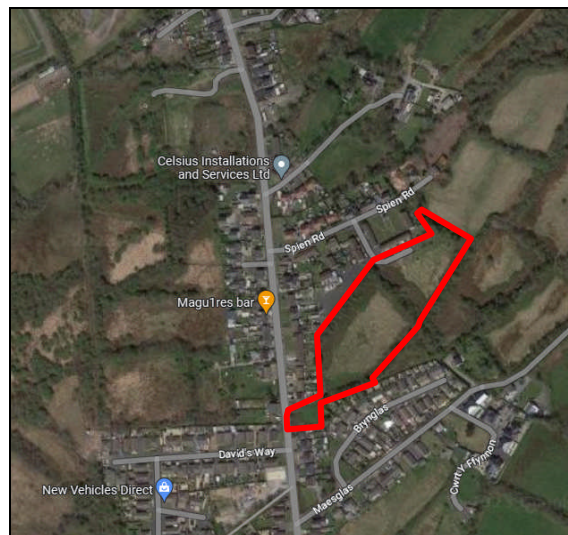
## 2.0 SITE CONTEXT

### 2.1 THE SITE

2.1.1 The Alternative Site relates to a parcel of land measuring just over 1.7ha, edged in red on the plan and photograph below.



**Plan A**



**Photograph 1**

2.1.2 The Site consists of three undeveloped enclosures that are in part laid to rough grass, as illustrated in the photographs below.



**Photograph 2**

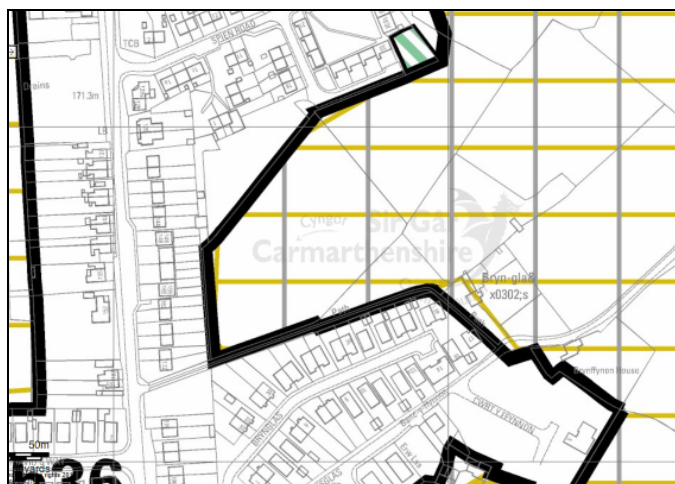


**Photograph 3**

2.1.3 As can be seen, the Site is gently sloping in nature and undeveloped. All of its boundary features are well defined, consisting of a mix of hedgerows, stock proof fencing and residential boundary treatments. The Site contains no water features within it and ground composition we understand has good drainage qualities.

2.1.4 In terms of access, the Site can be accessed via two points. The first is directly off Waterloo Road at the south western corner of the Site, which is also where a Public Footpath dissects part of the proposed Site. The second then is directly off Spien Road, which runs along the Site's northern edge.

2.1.5 Under the provisions of the current Carmarthenshire Local Development Plan, the site adjoins the Development Limits for the settlement of Penygroes, as illustrated in the plan below.



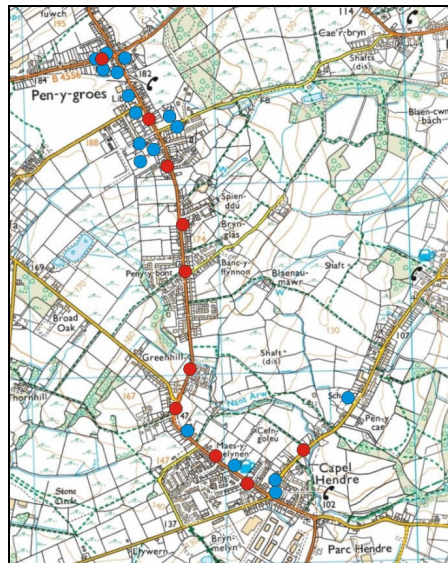
**Plan B**

2.1.6 As can be seen, a small part of the Site lies within the existing defined Development Limits, with the remainder in essence being almost completely encapsulated by them. Its position and proposed use therefore represents a natural and logical location for the settlement's expansion.

## **2.2 THE ADJOINING SETTLEMENT**

2.2.1 As detailed above, the Alternative Site adjoins the existing settlement and form of Penygroes. The existing built form and pattern of the settlement follows key access routes, with then further development leading off these in depth, such as the development of Spein Road to the north of the Site and that of Brynglas to the south. The larger town of Ammanford is then located a short distance to Penygroes' south east and Cross Hands to the north west.

2.2.2 The Site is also located a short distance from the settlement's core and within walking distance of all of its community facilities and local services, as well as those offered by the nearby settlement of Capel Hendre, all of which are marked by the blue circles on the map below.



**Plan C**

2.2.3 Access to further facilities in the larger towns of Ammanford, Llanelli and Cross Hands can then be gained by regular bus services (including numbers 128 and 129), a number of stops for which are within a short walk of the Alternative Site (marked by the red circles on Plan C). The strong sustainable position of Penygroes should therefore be given full consideration when considering potential future growth options.

2.2.4 In terms of planned growth put forward by 2<sup>nd</sup> Deposit LDP currently under consultation, the settlement of Penygroes forms part one of the 3 identified Principal Centres within the 2<sup>nd</sup> Deposit LDP. Within these areas, the majority of the County's growth (particularly with regards to housing) is expected to be accommodated within the Plan period. However, having undertaken a comprehensive review of the proposed allocations put forward by the 2<sup>nd</sup> Deposit LDP for the Principal Centre in question, it has been identified that a number have significant questions over their ability to be delivered within the Plan period, including the following:

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<b>Ref. No.</b>	<b>Site Name</b>	<b>Units</b>
PrC3/h4	Tirychen Farm	150
PrC3/h36	Betws Colliery	60
PrC3/h14	Nantydderwen, Tumble	33
PrC3/h22	Adj. to Pant y Blodau, Penygroes	79
PrC3/h2	Heol Gelynen, Brynamman	8

**Table 1**

2.2.5 As a result of the above, separate objections have been made in relation to the above allocations and it is therefore important that alternative more deliverable sites should be identified, to ensure the Plan can be regarded as being 'sound'.



## 3.0 THE PROPOSAL

3.0.1 As part of the requirements for the promotion of sites for residential development, this Report is accompanied by an indicative layout for a potential residential scheme that could be developed on the site. It should be emphasised that the accompanying layout is for illustrative purposes and that other design solutions for the site could also be reached. Notwithstanding this, the accompanying layout drawing has taken account of all the potential assets and constraints of the site and demonstrates that it is capable of delivering 33 units in a deliverable and sustainable manner. The following information therefore expands on this principle.

### 3.1 DEVELOPMENT OVERVIEW

3.1.1 It is proposed that the Alternative Site be allocated in the forthcoming replacement LDP for the purposes of 33 residential units. As detailed above, the accompanying illustrative layout (reproduced below) demonstrates that the site is capable of accommodating this number in a deliverable and sustainable manner.



Plan D

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- 3.1.2 As illustrated above, the site is also capable of accommodating a mix of unit sizes and types, with the associated density – 33 units – having therefore taken into consideration this potential mix, as well as striking a balance of being reflective of the existing form and density of residential development in the immediate locality.
- 3.1.3 With regards then to access, it is proposed that the Alternative Site would be served by two points of access off the existing local highway network – one off Waterloo Road and one off Spien Road. The proposals would make provision for the existing Public Footpath without the need for a diversion, as well as accommodating a speed table (or similar) as illustrated to act as a form of natural traffic calming.
- 3.1.4 It is also envisaged that a small area of the site (as shown) could be used to extend the existing equipped area of play located at the north eastern corner of the site. It is also recognised and supported that an element of the proposed units would be affordable in nature, which under the provisions of the current LDP would be in the region of 12%.

## **3.2 INFRASTRUCTURE CONSIDERATIONS**

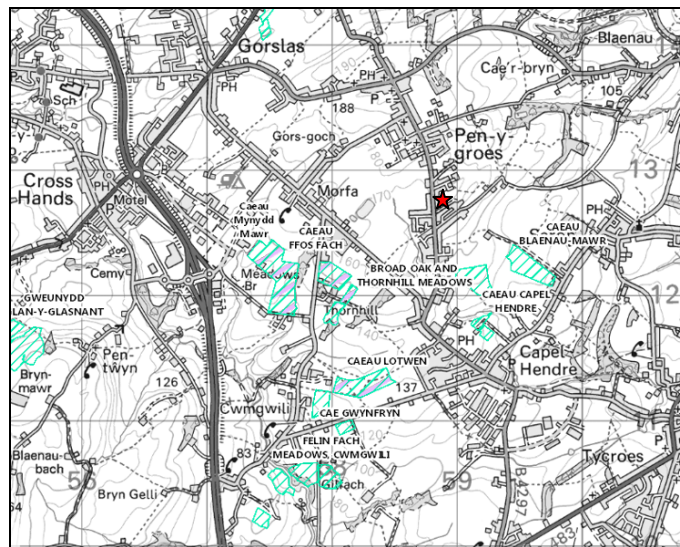
- 3.2.1 Any development of the Alternative Site for residential units would be served by mains water, public sewer and electricity, connections to which either lie within the site or in the adjoining stretch of aforementioned newly constructed estate road serving the adjoining residential development.
- 3.2.2 With regards then to surface water, it is considered that as a result of on-site features, there would be a number of options available to any development of the site in terms of its disposal.

## 4.0 ENVIRONMENTAL CONSIDERATIONS

### 4.1 ECOLOGICAL ATTRIBUTES

4.1.1 Any potential biodiversity assets the Site may include have been given full consideration with regards to exploring its potential for residential development. This has included the proposed retention and management of existing hedgerow features forming part of the Land Owners wider ownership.

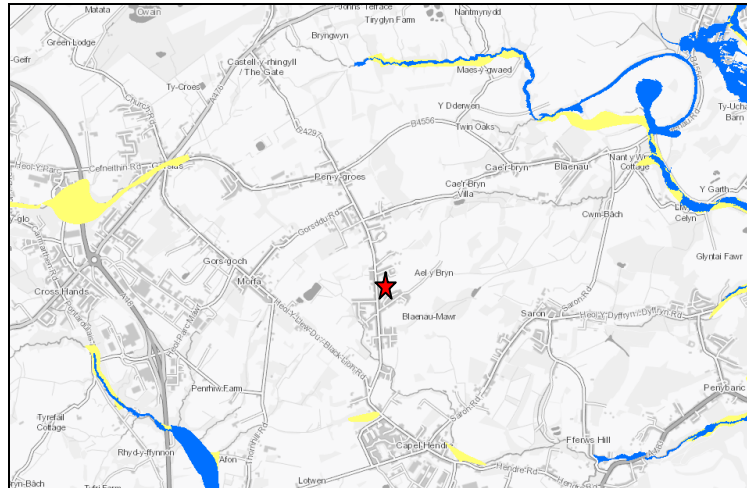
4.1.2 The site does not form part of any local or national nature conservation designation. In the wider content, there are then 8 further SSSI designations and 1 SAC designation within 3km of the Alternative Site (red star on Plan E), who's locations are illustrated on the plan below.



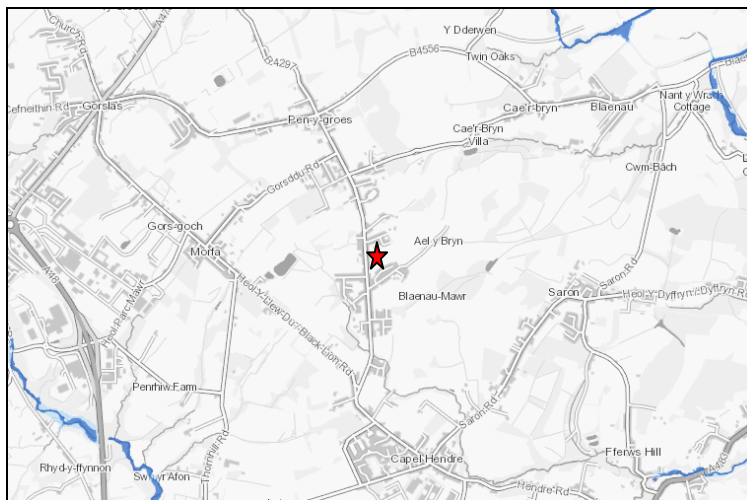
Plan E

4.1.3 In view of the above, it is considered that due to the separation distance from these designations and the Alternative Site, together with intervening topography (including existing residential development) that these factors will ensure that its development would have no detrimental impact on any local or national designation.





**Plan G**  
**(Development Advice Maps)**



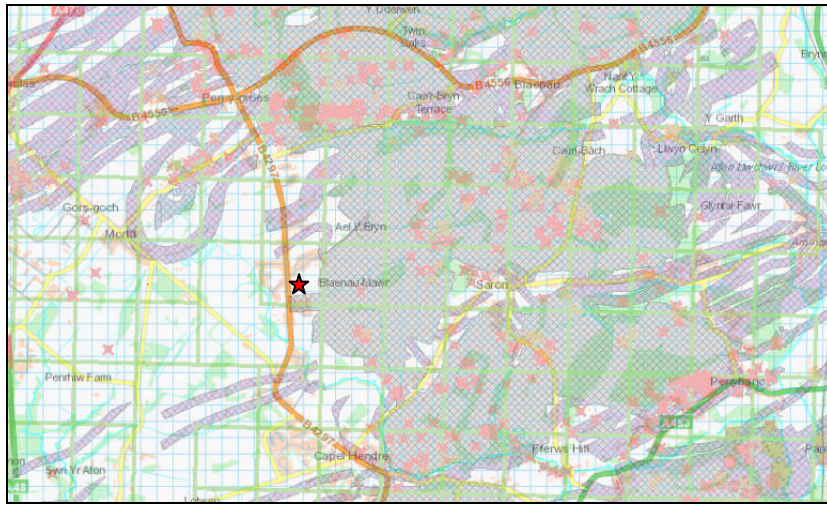
**Plan H**  
**(Flood Maps for Planning)**

4.3.2 Due to its greenfield nature and agricultural use, the Alternative Site has no ground contamination related constraints.

4.3.3 Whilst many areas in the locality have been the subject of mining in the past, Plan F below (obtained from the Coal Authority) shows that the Alternative Site (marked with



a red star) has no known surface or underground workings, or mine entries or associated ventilation shafts within it.



**Plan I**

4.3.4 As a result, the Site has no ground stability related constraints to its proposed development

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## 5.0 VIABILITY

5.0.1 As part of the preparation of any development plan, it is vital to ensure that allocations within it are both viable and deliverable. To not make efforts to explore both these aspects is to then risk that the Plan may be unsound and so in turn fail to meet its own targets or objectives.

5.0.2 Although detailed viability appraisals are difficult to prepare at this stage of the Plan's preparation due to the absence of, for example, such things as full engineering details, it is possible to undertake such appraisals at a strategic or in-principle level. The following therefore represents such a process and is fit-for-purpose in providing confidence with regards to both the viability and deliverability of the Alternative Site at this stage, but it should be noted, that more detailed analysis at a planning application stage may result in some variance.

### 5.1 VIABILITY APPRAISAL

5.1.1 The following provides an indication of the viability of delivering the proposed 6 units on the Alternative Site in question. It is based very much on its greenfield status and uses figures and costings previously accepted by the local authority through its determination of planning applications and other works. The following appraisal is therefore based on the assumptions set out below in order to provide a residual value for the scheme, prior to ascertaining an indicative land value.

#### Costs

- Dwelling construction costs are based on £1,150 per metre
- Adoptable road construction cost based on £1200 per metre
- Connections for all utilities include water, foul water and electric
- Developer's Profit based on RICS guidelines (18%)
- Professional Fees include planning application fee, associated professional fees, estate agency fees (1%) and LABC Warranty fee.

## **Sales**

- Sale Prices based on LPAs Affordable Housing SPG, market research and ACG figures where relevant.

5.1.2 Using the above, the following represents a strategic viability appraisal for the proposed 33 units, with 4 units being made available on an affordable basis (based on 4 three bed units).

<b>Costs</b>	<b>Cost Per Unit/Metre</b>	<b>No. Units/Metres</b>	<b>Total</b>
Four Bed Dwelling	239200	8	1913600
Three Bed Dwellings	161805	17	2750685
Three Bed Bungalow	131963	8	1055704
Shared Drive Construction	400	134	53600
Road Construction	1200	300	360000
Utility Connections	5000	33	165000
Professional Fees	-	-	184355
Sprinklers	3500	33	115500
Parks and Education Cont.	5000	33	165000
<b>Total</b>			<b>6598444</b>
<b>Sales</b>			
Four Bed Dwelling (Open Market)	320000	8	2560000
Three Bed Dwellings (Open Market)	280000	13	3640000
Three Bed Bungalow (Open Market)	300000	8	2400000
Three Bed Dwelling (Affordable)	79,380	4	317520
<b>Total</b>			<b>8917520</b>
Developers Profit	<b>Total</b>		<b>1337628</b>
<b>Residual Land Value</b>			<b>981448</b>

**Table 2**

5.1.1 Based on the above figures, it is considered that in-principle, the development of the site would be financially viable.



## **5.2 DELIVERABILITY**

- 5.2.1 In terms of deliverability, it should be firstly noted, as illustrated above, that the site is viable. Furthermore, there are no ownership or physical constraints preventing the Site's delivery.
- 5.2.2 In terms of a delivery timescale, with a developer secured, it is envisaged that the site could be capable of being completed within 3-4 years from the adoption of the replacement LDP, as well as in a phased manner within this time period.

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## 6.0 NATIONAL PLANNING POLICY CONSIDERATIONS

6.0.1 In the preparation of any development plan, consideration must be given to national policy and guidance. At present, this takes the form of *Planning Policy Wales* (PPW) (Edition 11) and a series of Technical Advice Notes (TAN) that deal with a range of topic areas.

### 6.1 HOUSING SUPPLY

6.1.1 With regards to the provision of housing, Paragraph 4.2.2 of PPW gives the following requirements the planning system must fulfil:

- *Identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;*
- *Enable the provision of a range of well designed, energy efficient, good quality market and affordable housing that will contribute to the creations of sustainable places; and*
- *Focus on the delivery of the identified housing requirement and the related land supply*

6.1.2 In addition to the above, Paragraph 4.2.10 of PPW states “*the supply of land to meet the housing requirement proposed in a development plan must be deliverable*”. As detailed previously, it is considered that the LPA has to date failed to accomplish this requirement under the provisions of the current LDP and will continue to do so under the provisions of the proposed allocations of the 2<sup>nd</sup> Deposit LDP.

6.1.3 In order therefore to re-dress this deficiency in provision, and provide a more robust approach to housing provision through a mixed site-scale approach, there is an urgent need to identify alternative deliverable housing allocations in the replacement Plan. Based on the accompanying information, it is clear that the Alternative Site represents one such example.

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## 7.0 CONCLUSION

- 7.1.1 Although currently undeveloped, the Alternative Site forms a logical extension to the existing settlement, being well related to and encapsulated by it, as well as being positioned at a location within the wider landscape to not form a prominent or logical part of the surrounding open countryside.
- 7.1.2 In addition to the above, the Site lies within close proximity and walking distance of the existing community services and local facilities of the adjoining settlement, which will ensure it makes a positive contribution to both national and local sustainable development objectives.
- 7.1.3 From a wider sense, the Site also benefits from well served excellent public transport links to the nearby settlements, the larger towns of Ammanford and Cross Hands, together with other locations within and adjoining the County, further increasing the facilities and services available to future residents of the Site via sustainable transport means. In tandem to this, the development of the Site will in turn ensure a deliverable source of future housing for the settlement and Principal Centre in which it lies, which has seen a dangerous level of under supply prior to and since the adoption of the current LDP. The development of the Site will help to redress this imbalance and it is strongly suggested that the Authority closely scrutinises those sites currently allocated in the LDP in terms of their suitability and deliverability if it is to continue to allocate them. National planning policy however would suggest that in view of the uncertainty in relation to their delivery, such sites should not form part of the replacement LDP.
- 7.1.4 With the Alternative Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable candidate for future housing development.

7.1.5 In view of the above it is considered that in its current form, the 2<sup>nd</sup> Deposit LDP fails to adhere to the Tests of Soundness as a number of the currently proposed residential allocations will fail to be delivered. In contrast, the Alternative Site presented herein does satisfy all Tests, and so it is respectfully requested that the Alternative Site in question be allocated for residential development.