



ALTERNATIVE ALLOCATION REPORT
FOR
REPLACEMENT CARMARTHENSHIRE LOCAL DEVELOPMENT
PLAN 2018-2033

LAND OFF PARC Y DELYN, CARMARTHEN

on behalf of
Omicorp Ltd

Our Ref: 1108.a
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Prepared by: JDE

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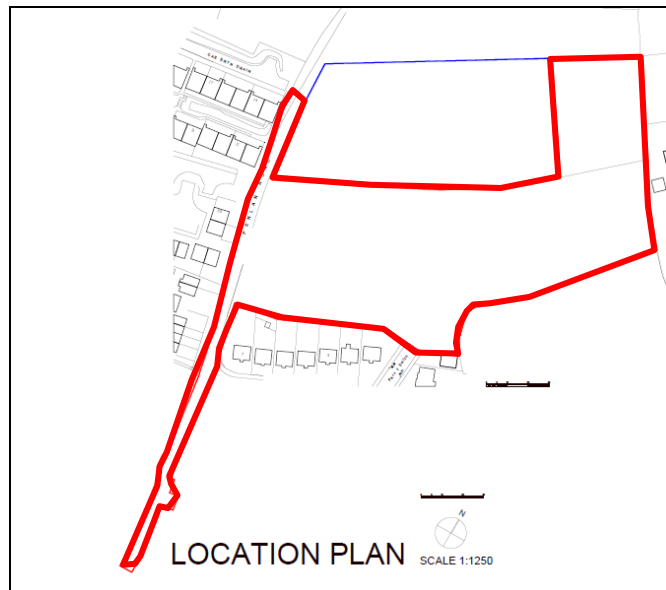
1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. has been instructed by Omnicorp Ltd to prepare and submit an Alternative Allocation Report for the allocation of land off Parc y Delyn, Carmarthen for the purposes of residential development in the forthcoming replacement *Carmarthenshire Local Development Plan (LDP)*.
- 1.2 This statement has been prepared in line with the Authority's published site assessment and selection documents. The contents of this Statement 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 Statement 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 AND CURRENT CONTEXT

2.1.1 The Alternative Allocation relates to the parcel of land edged red on the plan and image below.



Plan A



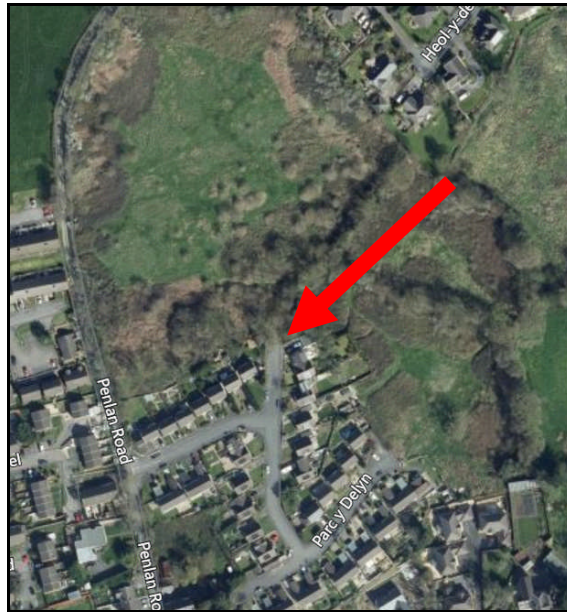
Photograph 1

- 2.1.2 The majority of the Site is made up of a single field enclosure that is dominated by semi-improved grassland (see photograph below) with large areas of scrub and slopes downwards in a north to south direction:



Photograph 1

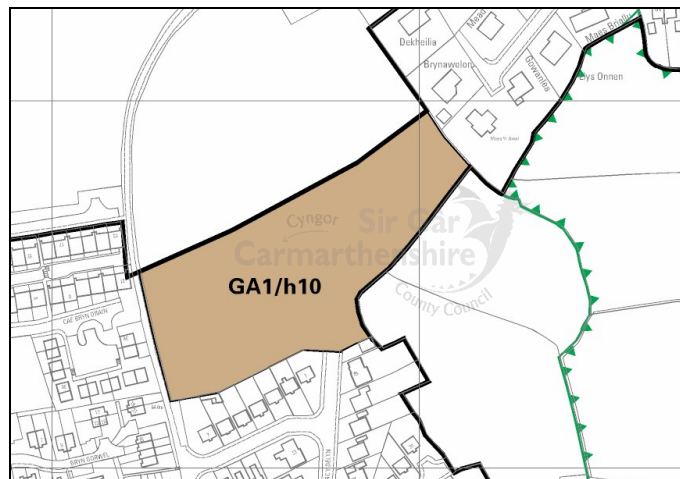
- 2.1.3 The boundaries of the Site are well defined by a mix of hedgerows, trees and stock proof fencing. Further trees of varying states of health can be found throughout a number of areas of the application site, as detailed in the accompanying Tree Survey Report.
- 2.1.4 The remaining elements of the Site then relate to small strips of land (all in the control of the Applicant or forming part of the public highway) along the eastern edge of Penlan Road, which will be utilised as part of the proposed development to widen the exiting carriageway and improve pedestrian linkages. Pedestrian access to the application site is at present via Parc y Delyn through informal vegetation. The access is identified by the red arrow on the aerial image below:



Photograph 2

2.1.5 Although this is the existing access to the site, a new vehicular and pedestrian access is proposed as part of this development along Penlan Road.

2.1.6 Under the provisions of the current Carmarthenshire LDP, the core of the Site is currently allocated for residential development, as illustrated by Plan B below.



Plan B

2.1.7 In response to the above allocation, a planning application for 20 units is currently being finalised to be submitted to the LPA for its consideration and determination in due course. However, as will be noted, the total area of the proposed Alternative Allocation is greater than the above allocation to allow for highway improvements and biodiversity mitigation and gain measures.

2.2 THE ADJOINING SETTLEMENT

2.2.1 In the immediate sense, the land to the north of the site currently forms part of a wider enclosure that includes the application site. The land to the south and west is then dominated by existing residential development, forming part of the greater urban area of Carmarthen.

2.2.2 As detailed above, the Alternative Allocation forms part of the greater urban area of Carmarthen with its associated community facilities and local services. The application site is within walking distance from the town centre. The strong sustainable position of the Alternative Allocation should therefore be given full consideration when considering potential future growth options.

2.2.3 In terms of planned growth, the proposed Alternative Site forms part of one of the 3 identified Principal Centres within the 2nd 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 2nd 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:

Ref. No.	Site Name	Units
PrC1/h4	Land off Parc y Delyn	17
PrC1/MU1	West Carmarthen	700
PrC1/MU2	Pibwrlwyd	247
SeC1/h4	Cae Canfas, Heol Llanelli, Pontyates	8
SuV4/h1	Adjacent Fron Heulog, Cynwyl Elfed	6
SuV12/h1	Adj. Gwyn Villa, Llanpumpsaint	20

Table 1

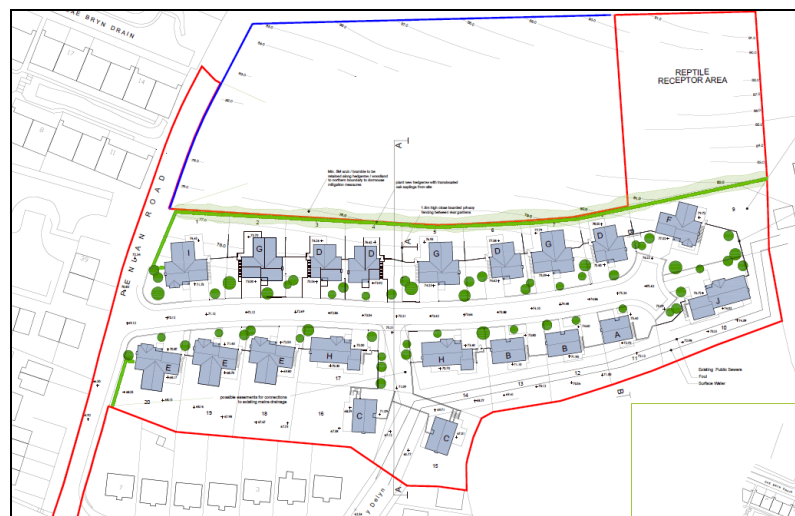
2.2.4 As a result of the above, separate objections have been made in relation to the above allocations and it is therefore important that alternative more deliverable sites should be identified, to ensure the Plan can be regarded as being 'sound'.

3.0 THE PROPOSAL

3.0.1 As part of the requirements for the promotion of sites for residential development, this Statement is accompanied by a layout for the residential scheme that will be part of the soon to be submitted planning application. The scheme has been fully worked up and takes account of all the Site's assets and constraints, as well as current Authority design guidance. As a result, it demonstrates that the Site is capable of delivering 20 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 Allocation be allocated in the forthcoming replacement LDP for the purposes of 20 residential units. As detailed above, the accompanying layout (reproduced below) demonstrates that the site is capable of accommodating this number in a deliverable and sustainable manner.



Plan C

3.1.2 As illustrated above, the site is capable of accommodating a mix of unit sizes and types, with the associated density – 20 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. The positioning of the proposed units has also taken into account the topography of the site.

- 3.1.3 With regards then to access, the Alternative Site will be served by a new point of access via its western boundary, via Penlan Road where a new estate road is proposed. All new units will then be positioned around a principle new adoptable estate road with each dwelling gaining access either directly off this or via short private shared drives. Each unit will then be served by generous private rear gardens, with smaller grass forecourts to their front. New rear boundaries serving each unit will then be defined by fencing or hedgerows.
- 3.1.4 In addition to the above, off-site improvements to the existing adjoining public highway (Penlan Road), as set out in the accompanying Transport Statement, would also be delivered as part of the development of the Alternative Allocation. This will include localised road widening and new footways to improve access and pedestrian linkage to the application site.
- 3.1.5 Any development would also give full regard to current biodiversity levels on the site and so land has been included within the Alternative Allocation to satisfy the recommendations of the accompanying ecological survey reports.
- 3.1.6 It is recognised and supported that an element of the proposed units would be affordable in nature, with the level of provision forming part of the review of the current LDP.

3.2 INFRASTRUCTURE CONSIDERATIONS

- 3.2.1 Any development of the Alternative Allocation for residential units would be served by mains water, public sewer and electricity, connections to which we understand lie within or in close proximity to the Site.

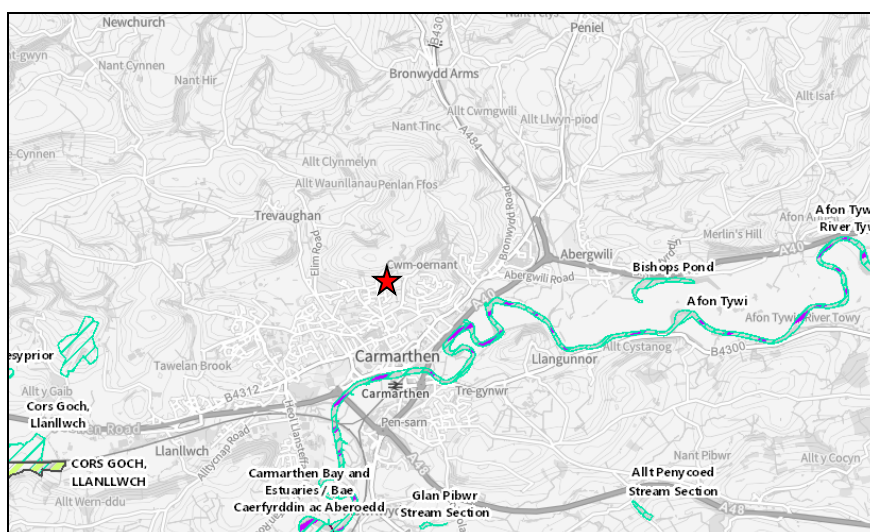
3.2.2 With regards then to surface water, it is considered that as a result of on-site features, there would be a number of options available to any development of the site in terms of its disposal, ensuring its development adheres to current regulatory requirements.

4.0 ENVIRONMENTAL CONSIDERATIONS

4.1 ECOLOGICAL ATTRIBUTES

4.1.1 As detailed above, a series of ecological surveys of the Site have been undertaken and have heavily influenced the form of the proposed development. Therefore, any 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 site boundary features, the creation of new boundary features and areas for enhancement.

4.1.2 The Alternative Site has been assessed against data held on the “Magic” website which details statutory and non-statutory National and Local sites of ecological importance. Plan D below provides an extract of those records applied to the Carmarthen locality. The red star denotes the position of the Alternative Site.



Plan D

4.1.3 As can be seen from the above, the Alternative Site does not form part of and neither is it near any national or local designations. The nearest designation is the River Tywi SSSI/SAC, but due to the intervening distance and topography, the development of the Alternative Site will not have any detrimental impact on this feature.

4.2 HISTORICAL ASSETS

4.2.1 Below is an extract from the 'Archwilio' website that represents a resource for the Historic Environment Records of Wales, with the Alternative Site indicated by a red star.

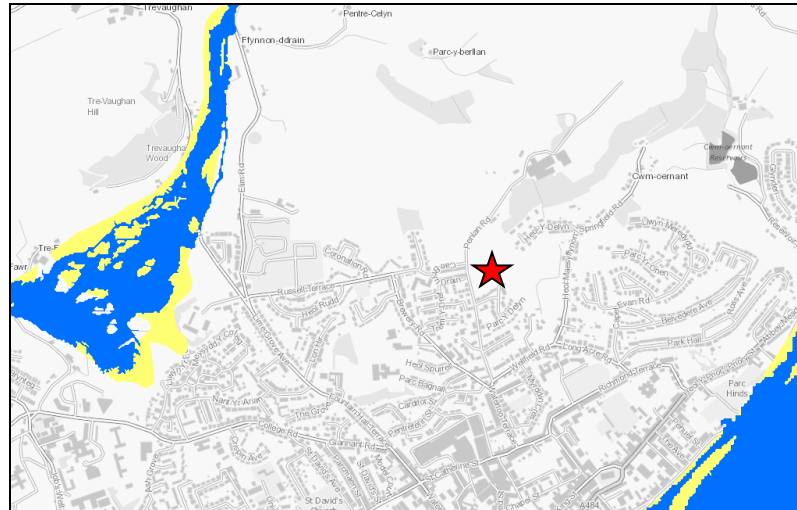


Plan E

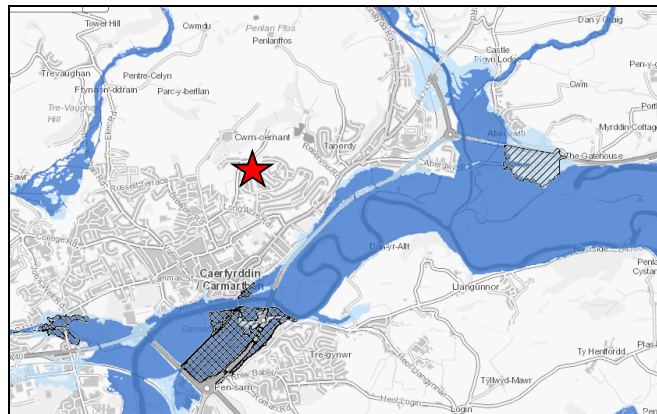
4.2.2 As can be seen, neither the Alternative Allocation nor immediately adjoining element of the settlement includes any Scheduled Ancient Monuments, Listed Buildings or Conservation Area's. As a result, the development of the Site would not have any detrimental impact on the setting or interest of any nearby historical asset.

4.3 ENVIRONMENTAL CONSTRAINTS

4.3.1 The Candidate Site is not categorised as being at risk of flooding in terms of the Development Advice Maps or those produced by Natural Resources Wales, as illustrated by the plans below (Alternative Site indicated by the red star).



Plan F
(Development Advice Maps)



Plan G
(Flood Maps for Planning)

4.3.2 Due to its greenfield nature, the Candidate Site has no ground contamination related constraints.

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 Candidate 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 20 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 £1,250 per metre (to allow for ground levels).
- 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 20 units, with 3 units being made available on an affordable basis (based on 3 three bed units).

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
4 Bed Det. (145 sq m)	181259	13	2356367
3 Ded Det. (120sq m)	150000	7	1050000
Road Construction + Off Site			100000
Utility Connections	5000	20	100000
Professional Fees	-		113698
Sprinklers	3500	20	70000
Parks and Education Cont.	5000	20	100000
		Total	3890065
Sales			
3 Bed Det. (120 sqm) (Aff.)	78286	3	234858
3 Ded Det. (120sq m)	265000	3	795000
4 Bed Det. (145 sq m)	330000	14	4620000
		Total	5649858
Developers Profit		Total	1016974.44
		Residual Land Value	742818.56

Table 2

5.1.3 Although the above figures have not been able to take into account any future changes to construction costs as a result of other external factors (e.g. changes to Building Regulations), 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 financially and physically viable, with no environmental, geo-physical or technical constraints prohibiting immediate development. Furthermore, there are no ownership or third-party interests preventing the Ssite's delivery.
- 5.2.2 In terms of a delivery timescale, it is envisaged that the site could be capable of being completed within 2 years from the adoption of the Replacement Local Development Plan. Parc y Delyn and its immediate environs remains an attractive part of Carmarthen given its panoramic views over the surrounding landscape and good access to nearby schools, shops, services and community facilities.

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 2nd 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.

7.0 CONCLUSION

- 7.1 Although currently undeveloped, the Alternative Site forms a logical extension to an existing settlement, being well related to it and being positioned at a location within the wider landscape to not form a prominent or logical part of the surrounding open countryside.
- 7.2 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.
- 7.3 From a wider sense, the Site will also benefit from well served excellent public transport links to the adjoining larger town of Carmarthen, 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.
- 7.4 In tandem to the above, the development of the Site will in turn ensure a viable and so deliverable source of future housing for the Principal Centre is forms part of, 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.
- 7.5 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.

7.6 In view of the above and information provided in this Statement, it is respectfully requested that the Alternative Site in question be designated for residential development.