



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

LAND ADJOINING PLASNEWYDD, FOELGASTELL

on behalf of
Mr M Jay

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1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. has been instructed by Mr M Jay to prepare and submit an Alternative Allocation Report for the allocation of land adjoining Plasnewydd, Foelgastell for the purposes of residential development in the forthcoming replacement *Carmarthenshire Local Development Plan (LDP)*.
- 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 AND CURRENT CONTEXT

2.1.1 The Alternative Site relates to a parcel of land measuring approximately 1.8 acres in area in total, edged red on the plan and the photograph below.



Plan A



Photograph 1

2.1.2 Following recent land management, the site currently has a clear appearance, as illustrated by the photographs below:



Photograph 2



Photograph 3

2.1.3 As can be seen from the above photographs, the site is generally level. In addition, all its boundaries are clearly and well defined, the majority of which are mature tree lines or hedgerows. The exception is the north-western boundary (Photograph 2), which is more domestic in appearance, being shared with existing residential development beyond.

2.1.4 Access to the site is currently gained via an existing field entrance in the site's south western boundary, leading directly onto the adjoining public highway (Heol y Foel).

The frontage of the site shared with the adjoining highway is particularly straight, providing excellent visibility in both directions, as illustrated below.



Photograph 4



Photograph 5

2.1.5 Under the provisions of the current Carmarthenshire LDP, the Site presently lies at the southern edge of the defined Development Limits of the settlement of Foelgastell. However, as the extract of the Proposals Map below illustrates, the Site (outlined in red) adjoins the current built form of the urban area directly to the north west, with its remaining boundaries presenting a very strong and defensible boundary to the much more open landscape to the east and north east of the site.



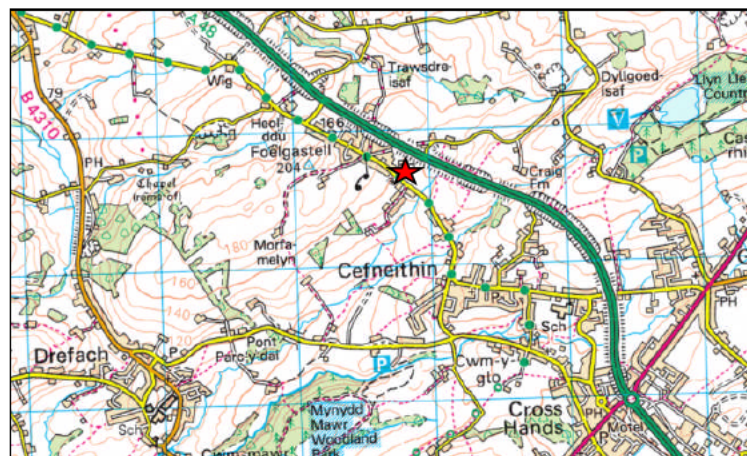
Plan B

2.1.6 As can be seen, the Alternative Site is therefore well related to the existing defined Development Limits for Foelgastell and the settlement's built form as a whole when existing residential development directly to its north west and indeed that to its south east, is taken into consideration. Its position and proposed use therefore represent 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 built form of the settlement of Foelgastell. Foelgastell is a linear style development in form, with the bulk of it being located along Heol y Foel. In more recent times, development has then occurred 'in-depth' off Heol y Foel, with examples being found at Parc y Gelli and Parc Newydd.

2.2.2 In terms of community facilities and local services, the settlement of Foelgastell includes a public house, play area, place of worship, as well as a regularly served bus stop. However, the site (indicated by the red star on Plan C) is in close proximity to the larger wider conurbation of Cross Hands and its outlying settlements to the south east (see Plan C below).



Plan C

- 2.2.3 The strong sustainable position of the Alternative Site should therefore be given full consideration when considering potential future growth options.
- 2.2.4 In terms of planned growth for Foelgastell, the 2nd Deposit LDP currently contains no proposed housing allocations for the Plan period. This in itself is surprising, considering the sustainable qualities of the settlement.
- 2.2.5 Notwithstanding the above, the proposed Alternative Site lies in close proximity and is well related to 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
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

- 2.2.6 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 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, as well as current Authority design guidance, and demonstrates that it is capable of delivering 6 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 Candidate Site be allocated in the forthcoming replacement LDP for the purposes of 6 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

-
- 3.1.2 As illustrated above, the site is potentially capable of accommodating a mix of unit sizes and types, with the associated density – 6 units – having therefore taken into consideration this potential mix. The form of development for the Alternative Site is also capable of following the current development form of existing properties positioned along Heol y Foel.
- 3.1.3 With regards then to access, it is proposed that the Alternative Site would be served either by a single point of access serving a shared access drive, or via individual private drives as illustrated in Plan D. In both situations, as can be seen in the Photographs at Section 2, the required level of visibility is achievable in both directions.
- 3.1.4 The Alternative Site proposal can retain and enhance existing boundary treatments as recommended in the accompanying Ecological Appraisal, as well as accommodating further biodiversity enhancements within a detailed scheme for the site.

3.2 INFRASTRUCTURE CONSIDERATIONS

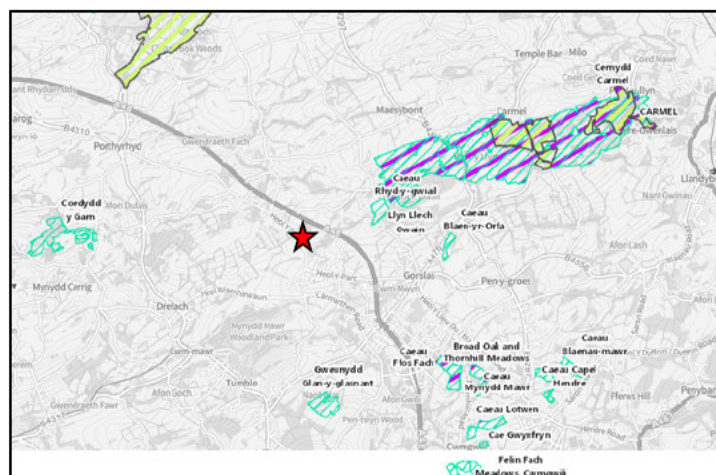
- 3.2.1 Any development of the Alternative Site for residential units would be served by mains water, public sewer and electricity, connections to which we understand lie within or in close proximity to the Site.
- 3.2.2 With regards then to surface water, it is considered that as a result of on-site 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 Accompanying this submission is an Ecological Appraisal for the site. As indicated, the Site does not contain any protected flora or fauna, or signs of their presence. However, and in line with the Appraisal's recommendations, 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 site boundary features.

4.1.2 The Alternative Site has been assessed against data held on the "Magic Map" website which details statutory and non-statutory National and Local sites of ecological importance. Plan E below provides an extract of those records applied to the Foelgastell locality, with the red star denoting the position of the Alternative Site.



Plan E

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. Although a number are within 2-4km of the site, due to the intervening distance and topography, the development of the Alternative Site will not have any detrimental impact on these features.

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.

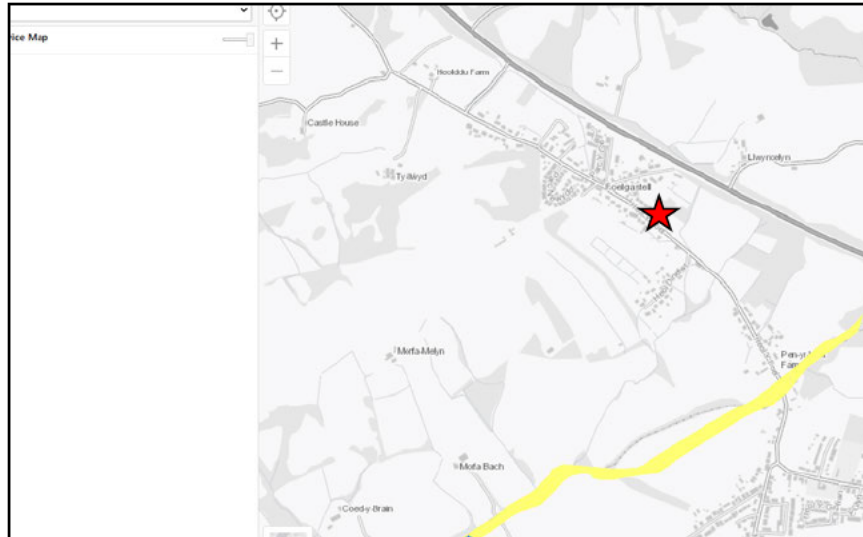


Plan F

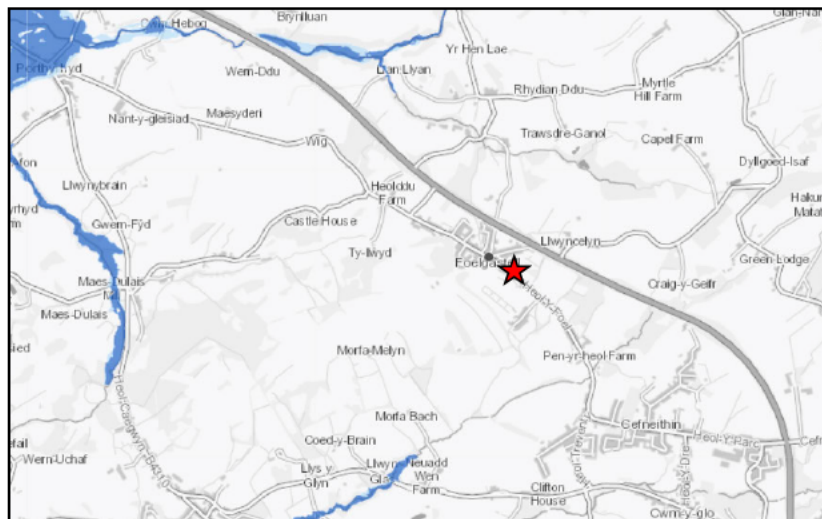
4.2.2 As can be seen, neither the Alternative Site nor immediately adjoining element of the settlement includes any Scheduled Ancient Monuments, Listed Buildings or Conservation Area's. As a result, the development of the Site would not have any detrimental impact on the setting or interest of any nearby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



Plan H
(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 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 £1,300 per metre given that bespoke four bed detached houses (169 sq.m.), with a medium grade of internal finishing.
- 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 6 units, based on an affordable housing level being a financial contribution of £40.42 per square metre of internal floorspace.

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
4 Bed semi(169 sqm)	219700	6	1318200
Utility Connections	5000	6	30000
Professional Fees	-		42600
Sprinklers	3500	6	21000
Affordable Hsng. Cont.			42000
Parks and Education Cont.	5000	6	100000
Total			1553800
Sales			
4 Bed semi(169 sqm)	425000	6	2550000
Total			2550000
Developers Profit		Total	459000
Residual Land Value			537200

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 site'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.

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, as well as an element of the larger conurbation of Cross Hands to the south east. This will then 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 conurbation of Cross Hands and indeed 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 area it 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.