



CANDIDATE SITE SUPPORTING STATEMENT
FOR
REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT
PLAN 2018-2033

LAND OFF COLONEL ROAD, BETWS, CARMARTHENSHIRE

On behalf of
Davies Richards Developments Ltd

Our Ref: 0632.c
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Prepared by: JDE

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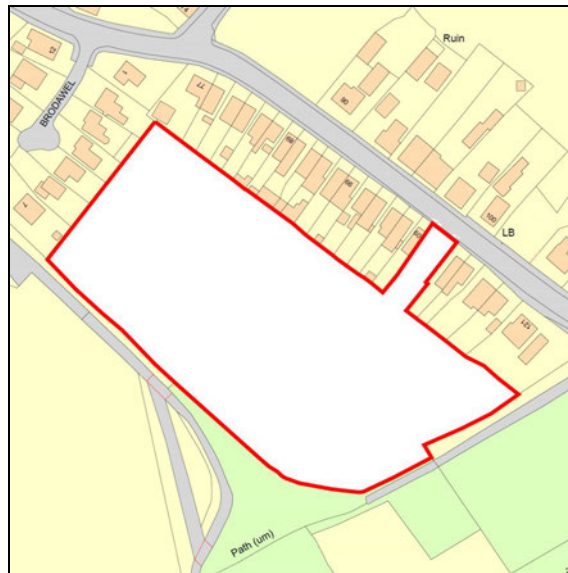
1.0 INTRODUCTION

- 1.1 JCR Planning has been instructed by Davies Richards Developments Ltd in conjunction with the land owners to prepare and submit a Candidate Site Supporting Statement for the allocation of land off Colonel Road, Betws for the purposes of residential development in the forthcoming replacement Carmarthenshire Local Development Plan.
- 1.2 This Statement has been prepared in line with the Authority's published documents entitled *Revised Carmarthenshire Local Development Plan: Guidance Note* and *Revised Carmarthenshire Local Development Plan: Candidate Site Assessment Methodology*. 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 9)* 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 supporting information and indicative site layout drawing.

2.0 SITE CONTEXT

2.1 THE SITE

2.1.1 The Candidate Site relates to a parcel of land measuring just over 1.3ha, edged in red on the plan below.



Plan A

2.1.2 The Site primarily consists of an undeveloped agricultural enclosure, split into separate paddocks and currently laid to grass. Its remaining element then relates to the curtilage of 111 Colonel Road, which includes the existing semi-detached dwelling house (Photograph 1), together then with its associated garden and outbuildings.



Photograph 1

2.1.3 The Site is generally level in nature and all of its boundaries are strongly defined by a mix of hedgerows, stock proof fencing and domestic boundary features.

2.1.4 In terms of access, the Site is currently accessed via the drive of 111 Colonel Road, pictured in Photograph 1. The section of Colonel Road then from which access to the Site is gained, is generally straight with a good level of visibility in each direction, as illustrated in the photographs below.



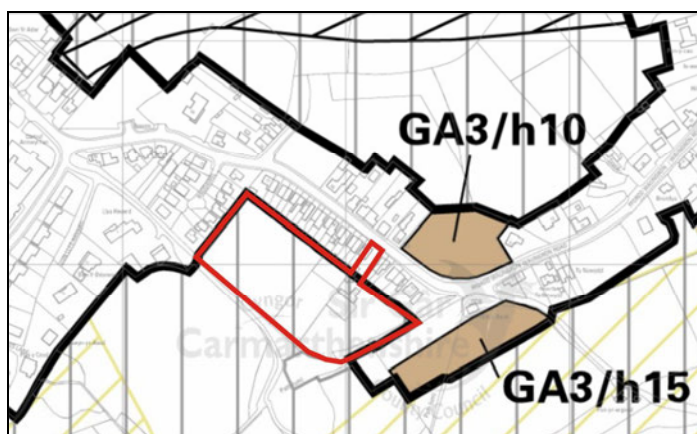
Photograph 2



Photograph 3

2.1.5 As can be seen from the above photographs, Colonel Road is a residential street, which combined with the curvature of the road further south and north of the Candidate Site, ensures that traffic speeds are controlled and low.

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



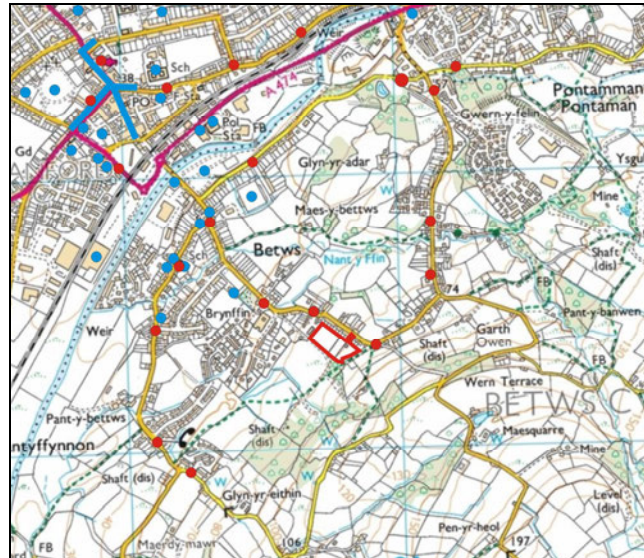
Plan B

2.1.7 As can be seen, the Candidate Site adjoins and is well related to the existing defined Development Limits for Betws and the greater urban area of Ammanford, particularly when existing residential development directly to its north west, north east and south east is taken into consideration. Its position and proposed use therefore represents a natural and logical location for the settlement's expansion, in fact representing an excellent example of 'infill development' within the existing urban form.

2.2 THE ADJOINING SETTLEMENT

2.2.1 As detailed above, the Candidate Site adjoins the existing settlement and form of the greater Ammanford urban area. The existing built form and pattern of the settlement follows key access routes, with then further development leading off these in depth, such as Colonel Road.

2.2.2 The Site is also located a short distance from the settlement's core and within walking distance of a number of its community facilities and local services, all of which are marked by the blue circles and thick blue lines on the map below.



Plan C

2.2.3 Access to further facilities in adjoining settlements and those areas adjoining the County can then be gained by regular bus services (including numbers 63, 124, 127, 145 and 146), a number of stops for which are within a short walk of the Candidate Site. The strong sustainable position of the urban area should therefore be given full consideration when considering potential future growth options.

2.2.4 In terms of planned growth, the proposed Candidate Site forms part of one of the 3 identified Growth Areas (GA3) within the current LDP. Within these areas, the majority of the County's growth (particularly with regards to housing) was expected to be accommodated within the Plan period. However, a significant number of the housing allocations within GA3 have yet to be delivered 3 years since the Plan's adoption, particularly within the Amman Valley, of which the Candidate Site forms part.

2.2.5 We understand that this worrying trend has been identified and acknowledged by the Authority through its own assessment of current allocations. In the report to Full Council in January of this year all allocations were categorised as either being 'Red', 'Yellow' or 'Green' in terms of their ability to be delivered, with Red being those considered to be the least deliverable, or not capable of being delivered at all. Table 1 below therefore provides an indication of those sites categorised as being 'Red' by the Authority.

LDP Ref.	Site Name	Units
GA3/h2	Residential Caravan Park, Parc Henry Lane	9
GA3/h4	North of Church Street	27
GA3/h6	Former police station	12
GA3/h7	Viji Garage, High Street	20
GA3/h8	Lon Ger y Coed/ Wernoleu Road	14
GA3/h17	Tirychen Farm	250
GA3/h25	Delfryn Estate	15
GA3/h26	Land adj Llys Newydd Nursing Home	25
GA3/h30	King's Road	22
GA3/h33	Land adj Penygroes Road	17
GA3/h36	Adj Clos y Cwm	12
GA3/h53	Nantydderwen	33

Table 1

2.2.6 From the above table, it is evident that there is a total of 456 'red' units – those considered unlikely to be delivered by the Authority. Whilst it is recognised that some of the above are the subject of implemented consents, the remaining number of units without the benefit of an implemented planning permission continues to be over 440. Whilst this in itself questions their delivery, it should be noted that almost all of the above sites were previously allocated in the Carmarthenshire Unitary Development Plan and so despite being earmarked for development for over 12 years, almost all of the above allocations have failed to deliver any new housing within the identified Growth Area.

2.2.7 The net result of the above is that despite the Growth Area continuing to have a very strong provision of community facilities, local services and public transport

connections, its ability to grow and capitalise on these sustainable attributes has been prevented through allocations that have made no contribution to the housing stock since the LDP adoption, and indeed some time before this. The deliverability of the remainder of the aforementioned longstanding allocations are clearly in doubt and so in order to readdress this deficit in provision, and capitalise on the sustainability of the Growth Area, more deliverable residential allocations are required.

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 and demonstrates that it is capable of delivering 45 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 45 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 capable of accommodating a mix of unit sizes and types, with the associated density – 45 units – having therefore taken into account that of existing development adjoining it and within nearby more recent developments. In addition and to further reflect the character of the adjoining existing urban form, it is suggested that the proposed dwellings would be two storey in nature, again in the same manner as development adjoining the Site.
- 3.1.3 With regards then to access, it is proposed that the Candidate Site would be served by a new form of access off Colonel Road. This would be facilitated through the removal of the existing dwelling (No. 111 Colonel Road) and the provision of an adoptable estate road. At its new junction with Colonel Road, it is proposed that a new 'build-out' feature would form part of the scheme, as shown on the accompanying drawings. In addition, new provision would be made for additional car parking to serve some of the existing properties on Colonel Road.
- 3.1.4 Within the Site, the proposed dwelling would then be served predominantly by a new adoptable estate road, with a small number then being served by a private access road.
- 3.1.5 Due to the scale of the proposal and the proximity of existing facilities within the settlement, the proposal does not include any formal areas of open space. It is recognised and supported that under the provisions of the current LDP a contribution would be required as part of the proposed development, which in this case would be 10% of the units provided.

3.2 INFRASTRUCTURE CONSIDERATIONS

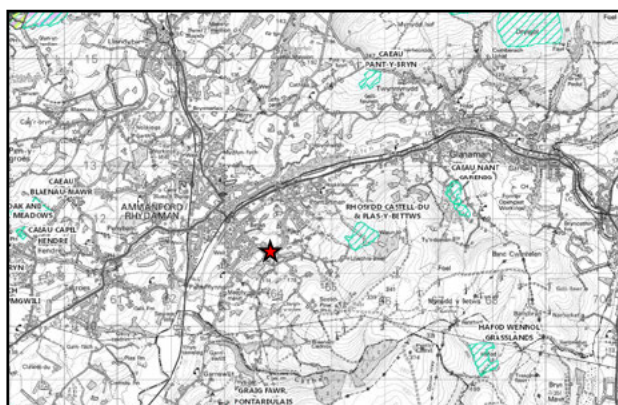
- 3.2.1 Any development of the Candidate Site for residential units would be served by mains water, public sewer and electricity, connections to which either lie within the site or in the adjoining stretch of public highway.

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 site boundary features, together then with the provision of mitigation measures where required as part of any detailed design solution prepared for the Site as part of any future planning application. As the accompanying Ecological Appraisal identifies, the Site does not contain any assets that would prevent the principle of the development of the Site for residential purposes.
- 4.1.2 The site does not form part of any local or national nature conservation designation,. In the wider content, there are 1 SSSI designation and no SAC designations within 3km of the Candidate Site (red star on Plan E), who's locations are illustrated on the plan below.



Plan E

- 4.1.3 Notwithstanding the above, it is considered that due to the separation distance from these designations and the Candidate Site, together with intervening topography (including existing residential development) that these factors will ensure that its development would have no detrimental impact on them.

4.2 HISTORICAL ASSETS

4.2.1 Betws and Ammanford contain a number of Listed Buildings and structures, with the nearest being St David's Parish Church, some 400m to the north west of the Candidate Site. As a result of this separation distance and intervening development, it is not considered that the proposal will have any detrimental impact on the setting or historical interest of this asset.

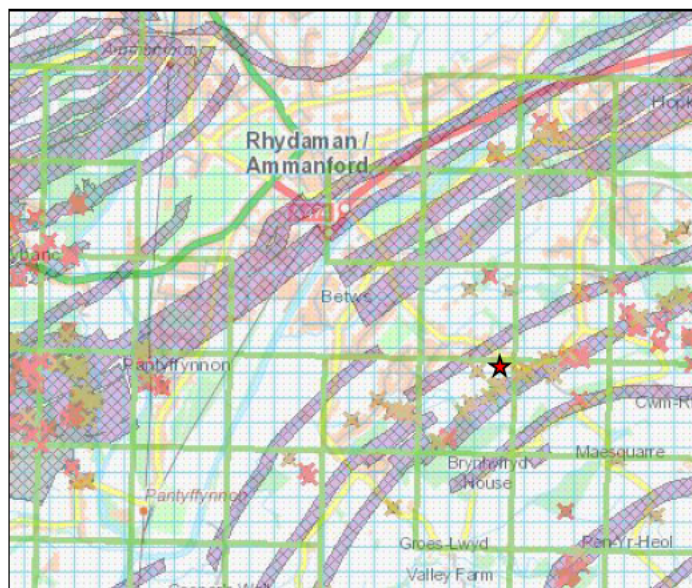
4.2.2 There are then no Scheduled Ancient Monuments (SAM) within or adjoining the Candidate Site. As a result, the development of the Site would not have any detrimental impact on the setting or interest of any nearby historical asset.

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.

4.3.2 Due to its greenfield nature and agricultural use, the Candidate 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 Candidate Site (marked with a red star) has no known surface or underground workings, or mine entries or associated ventilation shafts within its boundaries.



Plan F

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

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 45 units on the Candidate 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 £950 per metre.
- Adoptable road construction cost based on £1200 per metre
- Private shred drive construction cost based on £400 per metre
- Connections for all utilities include water, foul water and electric.
- Developer's Profit based on RICS guidelines (15%)

- 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 45 units, with 4 units classified as affordable (4 three bed units).

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
Two Bed Dwelling	66500	8	532000
Three Bed Dwelling	85500	38	3249000
Road Construction	1200	325	390000
Shared Access Drives	400	50	20000
Utility Connections	5000	45	225000
Professional Fees	-		132175.2
Sprinklers	3500	45	157500
Total			4620175.2
Sales			
Two Bed Dwelling	145000	8	1160000
Three Bed Dwelling	170000	33	5610000
Three Bed (Affordables)	76380	4	305520
Total			7075520
Developers Profit	Total		1061328
Residual Land Value			1394016.8

Table 2

5.1.3 Based on the above figures, it is considered that in-principle, the development of the site would be financially viable, including the provision of a financial contribution towards affordable housing in the area.

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 5 years from the adoption of the replacement LDP.

6.0 NATIONAL PLANNING POLICY CONSIDERATIONS

6.1.1 In the preparation of any development plan, consideration must be given to national planning policy and guidance. At present, this takes the form of *Planning Policy Wales (Edition 9)* and a series of *Technical Advice Notes (TAN)* that deal with a range of topic areas.

6.1.2 With regards to residential development, or housing, the overarching requirements and principle guidance set by national policy can be found at Paragraph 9.2.3, which reads as follows:

“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.”

6.1.3 At present, Carmarthenshire County Council’s housing supply figure is below the required 5 year level and so it is imperative that this is addressed as quickly as possible to avoid further deterioration of communities and the facilities and services they have to offer. The instigation of the review of the LDP will form part of addressing this issue, but only if truly sustainable and deliverable allocations are identified and allocated, to replace many of the failing sites that currently form part of the Authority housing and growth strategy for the County, as set out by the current LDP.

6.1.4 Dealing specifically with the Candidate Site subject of this report, it is evident that its inclusion within the replacement LDP would adhere to the requirements of Paragraph

9.2.3, in that it is free from any planning, physical or ownership constraint. In addition, as shown at Section 5 of this Statement, the site is also economically viable in deliverability terms.

6.1.5 Paragraph 9.2.9 then provides Authorities with more specific guidance in selecting sites for allocation for residential development and in terms of the Candidate Site, it is considered that it satisfies all relevant criteria, including the following:

- The location of the Candidate Site is sustainable in terms of its proximity to a range of community facilities, local services and public transport services.
- The physical and social infrastructure of the settlement is capable of accommodating the proposed development without detriment to any interest.
- The Candidate Site is not subject to any physical constraint such as flood risk, ground instability, ecological interest, historic assets or contamination that would prevent its delivery.
- The development of the site for residential purposes would be compatible with existing adjoining land uses.

6.1.6 In summary therefore, the allocation of the Candidate Site adheres and supports the objective, principles and requirements of national planning policy.

7.0 CONCLUSION

- 7.1.1 Although currently undeveloped, the Candidate Site forms a logical extension to the 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. Its development would also in fact represent an excellent and sustainable form of infill development, that would then in turn represent a clear rounding-off of the developed form of Ammanford at this location.
- 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 wider urban area it forms part of, 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 and other locations within and adjoining the County, further increasing the facilities and services available to future residents of the Site via sustainable transport means.
- 7.1.4 In tandem to this, the development of the Site will in turn ensure a deliverable source of future housing for the settlement and Growth Area 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.
- 7.1.5 With the Candidate 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.

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