



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

LAND OFF BLAENAU ROAD, LLANDYBIE, CARMARTHENSHIRE

On behalf of
Davies Richards Developments Ltd

Our Ref: 0632.a
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Prepared by: JDE

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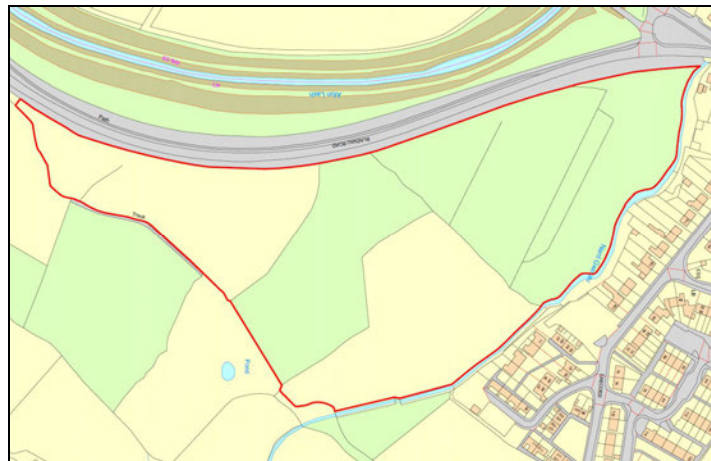
1.0 INTRODUCTION

- 1.1 JCR Planning has been instructed by Davies Richards Development in conjunction with the land owners to prepare and submit a Candidate Site Supporting Statement for the allocation of land off Blaenau Road, Llandybie 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 series of agricultural enclosures measuring just over 7ha in area and is edged red on Plan A below.



Plan A

2.1.2 As can be seen from the photograph contained with the accompanying Ecological Appraisal report, the Site consists of a series of agricultural enclosure of varying form and scale. The land is generally agricultural in nature, but has seen varying degrees of management in recent years. As a result, the land consists predominantly of grazing land of varying qualities.

2.1.3 External and internal field boundaries of the Site are then defined by hedgerows, some of which have become more established and now consist of elements of tree lines. The Site itself is reasonably level, with only a slight slope in an west to east direction away from Blaenau Road. As a result of this, the Site is generally well drained, leading on then to the water course that runs along its eastern boundary.

2.1.4 Access to the Site is currently gained via field gates in its western boundary, leading on to Blaenau Road. There are no Public Footpaths crossing the site or adjoining it.

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

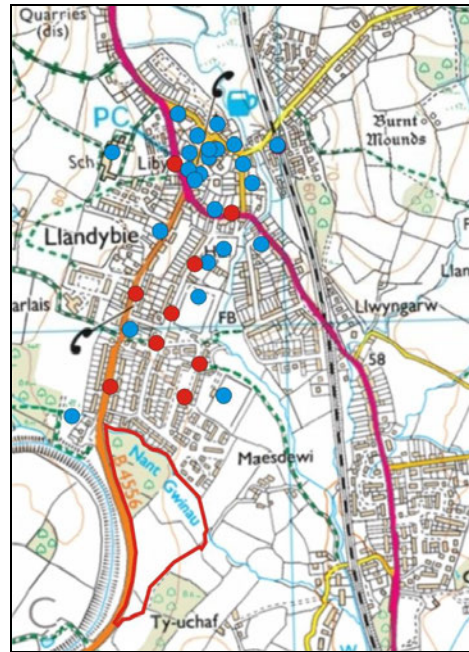


Plan B

2.1.6 As can be seen, the Candidate Site has a close association in the immediate sense with the existing form of the settlement to its north, as well as being located along one of its principle entry routes.

2.2 THE ADJOINING SETTLEMENT

2.2.1 As detailed above, the Candidate Site adjoins the existing settlement and form of Llandybie. As a result, the Site is within walking distance of a number of its community facilities and local services, marked by the blue circles on the map below.



Plan C

2.2.2 From an accessibility perspective, Llandybie has a station on the Heart of Wales line, is located on a main transport artery in the form of the A483, as well as having very well served bus stops (circled red on Plan C). The bus services serving the settlement are numbers 103, 276, 284 and x13, which provide regular access to the following larger settlements, as well as the intervening villages:

- Ammanford
- Llandeilo
- Swansea

2.2.3 The strong sustainable position of Llandybie 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 are 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.

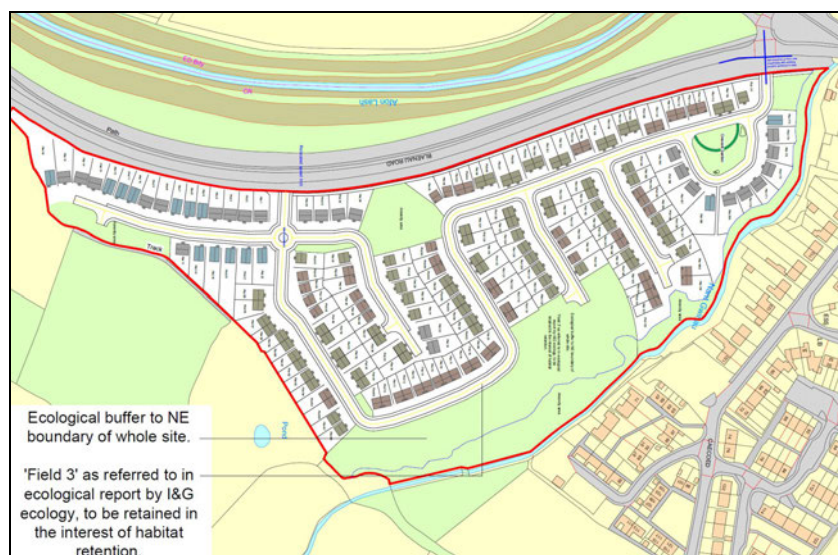
- 2.2.7 The net result of the above is that despite the Growth Area continuing to have a very strong provision of community facilities, local services and public transport connections, its ability to grow and capitalise on these sustainable attributes has been prevented through allocations that have 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 174 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 174 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, taking into account its setting and topography.



Plan D

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- 3.1.2 As illustrated above, the site is capable of accommodating a mix of unit sizes, but in order to maximise the efficient use of this greenfield site, it is suggested that all units would be two storey in nature. In a similar vein, the proposed density has also taken this into consideration, with the proposed number of units for the Site being in the region of 174. The layout of the proposal has then also been influenced by the on-site ecological attributes and the water course running along the eastern edge of the Site. In addition, the proposed development would also incorporate areas of formal amenity space.
- 3.1.3 With regards then to access, (which has been fully considered by the accompanying *Transport Assessment*) it is proposed that the Candidate Site would be accessed off the adjoining Blaenau Road via the points indicated on the accompanying drawing. This would also involve the relocation of the existing 30mph national speed limit further south along Blaenau Road.
- 3.1.4 It is 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 10%.

3.2 INFRASTRUCTURE CONSIDERATIONS

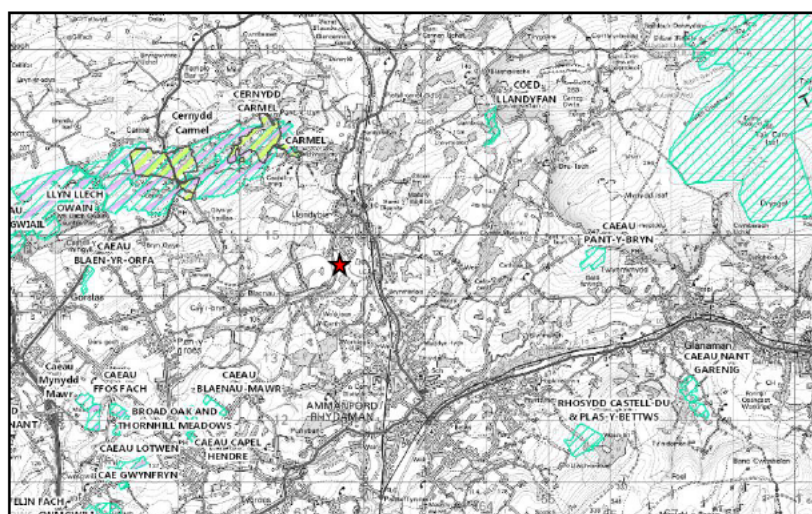
- 3.2.1 Any development of the Candidate Site for residential units would be served by mains water and electricity, connections to which lie within the adjoining stretch of public highway. We understand then that foul water would be dealt with by means of a connection to the public sewer system.
- 3.2.2 With regards to surface water, none of the Candidate Site or adjoining land show evidence of poor drainage conditions (e.g. marshy ground, water settlement etc.) and a water course runs along the eastern edge of the site. As a result, it is considered that there would be a number of options available to any development of the site in terms of the disposal of surface water.

4.0 ENVIRONMENTAL CONSIDERATIONS

4.1 ECOLOGICAL ATTRIBUTES

4.1.1 Accompanying this Statement is a detailed *Ecological Appraisal Report*. Although the Candidate Site does not include or adjoin any national or local nature conservation designation, any biodiversity assets it 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 boundary features where possible, as well as the exclusion of a parcel within the Candidate Site from development, which it is envisaged could be retained and managed further for biodiversity gain.

4.1.2 In the wider context, the site does not adjoin or form part of any local or national nature conservation designation. There are then 1 NNR designation, 2 SSSI designations and 1 SAC 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 However, as can be seen from above, the designations are significantly distant from the site, which will ensure that its development would have no detrimental impact on them.

4.2 HISTORICAL ASSETS

4.2.1 Llandybie contains a small number of Listed Buildings, with the nearest to the Candidate Site being Calvinistic Methodist Chapel, some 800m to its north. As a result, due to its location and intervening topography and features, it is not considered that the development of the Candidate Site would affect its setting or historical interest, or that of any other Listed Building in Llandybie.

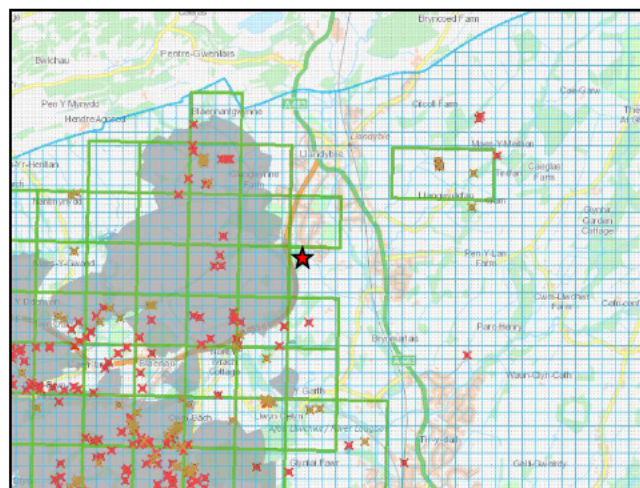
4.2.2 There is no Scheduled Ancient Monuments (SAM) within or adjoining the Candidate Site and only one within 3km of it – group of burnt mounds from the Bronze Age. However and again, due to the intervening distance and topography, the development of the site would not have any detrimental impact on this or any other SAM's setting or historic interest.

4.3 ENVIRONMENTAL CONSTRAINTS

4.3.1 The area of the Candidate Site proposed to be development 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) is some distance from any known surface or underground workings, or mine entries or associated ventilation shafts.



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 174 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.
- 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 174 units, 17 three bedrooms of which will be affordable.

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
House Type 1 (2 Bed)	71500	57	4075500
House Type 2 (3 Bed)	78850	78	6150300
House Type 3 (4 Bed)	114000	25	2850000
House Type 4 (4 Bed)	114000	14	1596000
Road Construction	1200	1095	1314000
Shared Access Drives	400	52	20800
Utility Connections	5000	173	865000
Professional Fees	-	-	768775.6
Sprinklers	3500	173	605500
Total			18245875.6
House Type 1 (2 Bed)	150000	57	8550000
House Type 2 (3 Bed)	175000	61	10675000
House Type 2c (4 Bed)	210000	25	5250000
House Type 3 (4 Bed)	215000	14	3010000
Total			28783460
Developers Profit	Total		4317519
Residual Land Value			6220065.4

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 and also capable of making a financial contribution towards the provision of affordable housing within the locality.

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 development of the Candidate Site for the scale of development proposed 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 represents a sustainable and deliverable opportunity to provide new housing for the settlement of Llandybie in a strategic fashion, as well as the larger Growth Area it forms part of. With the land already capable of being easily served by all services and an adopted means of access by virtue of the adjoining public highway, together with the Site's greenfield and agricultural form, there are no barriers to its delivery within the early stages of the forthcoming Plan.
- 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. In addition, the proposed opportunity for the retention of elements of the site for biodiversity management purposes, would not only provide a wider benefit for the local community, but would also assist in softening the overall wider developed landscape.
- 7.1.3 From a wider sense, the Site will also benefit from well served excellent public transport links to the nearby settlements, the larger town of Ammanford, 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 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.

7.1.4 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.

7.1.5 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.