



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

LAND OFF A484, SARON, NORTH CARMARTHENSHIRE

On behalf of
Dr J Thomas

Our Ref: 0552.a
Date: July 2018
Prepared by: JDE

1.0	INTRODUCTION	3
2.0	SITE CONTEXT	4
2.1	THE SITE	4
2.2	THE ADJOINING SETTLEMENT	6
3.0	THE PROPOSAL.....	10
3.1	DEVELOPMENT OVERVIEW	10
3.2	INFRASTRUCTURE CONSIDERATIONS	11
4.0	ENVIRONMENTAL CONSIDERATIONS.....	13
4.1	ECOLOGICAL ATTRIBUTES	13
4.2	HISTORICAL ASSETS	14
4.3	ENVIRONMENTAL CONSTRAINTS	14
5.0	VIABILITY.....	15
5.1	VIABILITY APPRAISAL	15
5.2	DELIVERABILITY	17
6.0	NATIONAL PLANNING POLICY CONSIDERATIONS	18
7.0	CONCLUSION.....	20

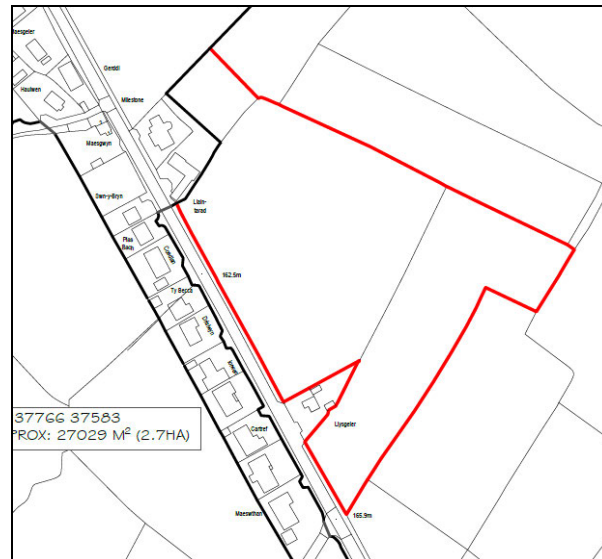
1.0 INTRODUCTION

- 1.1 JCR Planning has been instructed by Dr J Thomas (the Land Owner) to prepare and submit a Candidate Site Supporting Statement for the allocation of land off A484, Saron 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 existing agricultural enclosures measuring 2.7ha in area and is edged red on Plan A below.



Plan A

2.1.2 As the photographs below illustrate, the whole of the Site is currently laid to grass and used for agricultural purposes.



Photograph 1



Photograph 2

2.1.3 All three enclosures of which the Site forms part of are not sloping in nature, with its level being comparable to that of the adjoining public highway (A484). The Site contains no buildings or hardstandings and so is wholly greenfield in nature. All of the Site's boundaries are then currently defined by a mix of hedgerows or stock proof fencing.

2.1.4 Access to the Site is currently gained via a field gate in its western boundary that then leads on directly to the A484. The alignment of the road at this location and indeed continuing to the south and north is particularly straight, resulting in a good level of visibility in both directions, as illustrated in the photograph below.

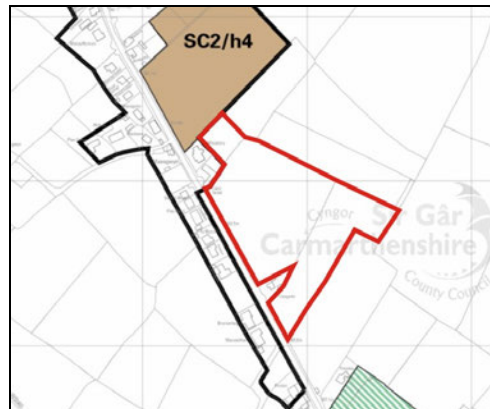


Photograph 3



Photograph 4

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

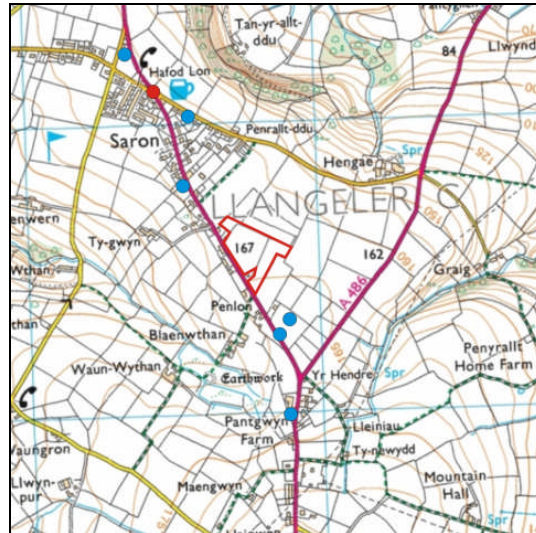


Plan B

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 and west, including an adjoining housing allocation as defined by the current LDP. However, it should be noted that, despite the land owners aspirations to develop the allocation, two previous planning applications submitted to the Authority have shown that the allocation is unable to be accessed in accordance with the local highway authority's requirements via land forming part of the allocation or within the currently defined Development Limits. This fact combined with the position of the Candidate Site, result in the Site therefore representing a logical opportunity for the expansion of the urban form at this location, as well as a facilitator for development within it.

2.2 THE ADJOINING SETTLEMENT

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



Plan C

2.2.2 As can be seen, Saron has a range of community facilities and local services, which include a primary school, post office, chapel, public house, petrol service station, shop and playing field. As a result of these, Saron in fact acts and provides the role of a 'service settlement' for the nearby villages of Rhos, Pentrecwrt and Llangeller, and hamlets of Drefelin and Glyn-teg, serving a much wider geographic area than that covered by Saron itself.

2.2.3 From an accessibility perspective, Saron has a number of very well served bus stop (circled red on Plan C). The bus services serving the settlement are numbers 460 and 613, which provide regular access to the following larger settlements, as well as the intervening villages:

- Carmarthen
- Newcastle Emlyn
- Cardigan

2.2.4 The strong sustainable position of Saron should therefore be given full consideration when considering potential future growth options.

2.2.5 In terms of planned growth, the proposed Candidate Site forms part of one of the Sustainable Communities (SC) as defined by the current LDP's settlement hierarchy. SC have been defined through their interdependence in terms of community facilities and local services, with the current LDP advising that "*Within each SC, land allocations will be identified in the most sustainable settlement or settlements which possess the greater level of essential services and facilities.*".

2.2.6 Notwithstanding the above, the majority of the housing allocations within SC2 (of which Saron represents the principle settlement) have yet to be delivered, 3 years since the Plan's adoption. 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', 'Amber' or 'Green' in terms of their ability to be delivered, with Amber and 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' or 'Amber' by the Authority for Sustainable Community SC2.

LDP Ref.	Site Name	Units
SC2/h2	Land adjoining Brynwawr	14
SC2/h3	Land adjacent to Tyddyn y Celyn	8
SC2/h4	Land adj. Arwynfa	35

Table 1

2.2.7 From the above table, it is evident that there are a total of 57 'amber' units – those whose delivery is considered to be questionable by the Authority. However, it should be noted that in fact, as there is no deliverable means of accessing Allocation SC2/h4 and ecological interests appear to be restricting the delivery of allocation SC2, these allocations should be categorised as Red. As a result, although allocation SC2/h3 is in part delivered, the remaining allocations are highly unlikely to deliver a significant proportion – 49 units - of the planned housing provision for the SC in question.

2.2.8 The net result of the above is that despite the Sustainable Community – and Saron in particular - 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. The deliverability of these longstanding allocations are clearly in doubt and so in order to redress this deficit in provision, and capitalise on the sustainability of the Sustainable Community, 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 21 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 21 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

-
- 3.1.2 As illustrated above, the Site is capable of accommodating a mix of unit sizes, but taking into account the existing form of development adjoining and surrounding the Site, it is suggested that bungalows would be the most appropriate form of unit at this location. The associated density – 21 units – has therefore taken into consideration these design parameters.
- 3.1.3 With regards then to access, it is proposed that the Candidate Site would gain access directly off the public highway running along the western edge of the Site, both in terms of any new estate road or private individual drives. The point of access onto the public highway for the proposed estate road has been chosen by taking into account the Site's existing topography and the level of visibility afforded by this section of the public highway. It should be also noted, that were the adjoining land to continue to be allocated for the purposes of residential development, an acceptable access that met with the LHA requirements could be provided as part of the development of the Candidate Site.
- 3.1.4 Due to the proximity of existing facilities and the Site's scale, the proposal does not include any formal areas of open space. However, it is recognised and supported that an element of the proposal would be expected to contribute towards the provision of affordable housing within the local area, which on the basis of the scale of the development, it is envisaged would be done by means of up to 30% of units on-site.

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, neither the Candidate Site or adjoining land show evidence of poor drainage conditions (e.g. water settlement etc.). As a result, it is

considered that there would be no obstruction 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 The Candidate Site, as illustrated in previous photographs, is largely actively used and managed for the purposes of agriculture and so is subject to the usual nutrient management practices. However, any existing periphery hedgerows would be retained as part of the Site's wider development, ensuring that where possible only those areas with a low biodiversity value are utilised for new residential development.
- 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 SSSI designations and 1 SAC within 3km of the Candidate Site (red star on Plan E), whose 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 Saron contains no Listed Buildings or Conservation Areas. As a result, it is not considered that the development of the Candidate Site would affect the setting or historical interest of either form of designation.
- 4.2.2 There are also no Scheduled Ancient Monuments (SAM) within or adjoining the Candidate Site.

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. Furthermore, due to its historical use – agricultural - 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 21 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 21 units, with 30% being made available on an affordable basis (based on 6 three bed units).

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
Three Bed Bungalow (128sq.m.)	121600	3	364800
Three Bed Bungalow (134 sq.m.)	127300	14	1782200
Four Bed Bungalow (200 sq.m.)	190000	2	380000
Five Bed Bungalow (250 sq.m.)	237500	2	475000
Road Construction	1200	288	345600
Shared Access Drives	400	90	36000
Utility Connections	5000	21	105000
Professional Fees	-		106059.2
Sprinklers	3500	21	73500
Total			3668159.2
Sales			
Three Bed Bungalow (134 sq.m.)	280000	11	3080000
Three Bed Bungalow (Affordable)	71320	6	427920
Four Bed Bungalow (200 sq.m.)	305000	2	610000
Five Bed Bungalow (250 sq.m.)	325000	2	650000
Total			4767920
Developers Profit	Total		715188
Residual Land Value			384572.8

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 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 forms a logical extension to the existing settlement, as well an opportunity to facilitate the delivery of adjoining land previously considered appropriate for development by the Authority. The Site's close association to existing and proposed development to its west and north respectively also result in the ability of the Site being developed without detriment to visual amenity, in either the immediate or wider context.
- 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 will also benefit from well served excellent public transport links to the nearby settlements, the larger town of Carmarthen, Newcastle Emlyn and Cardigan, 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 Sustainable Community in which it lies and forms a core 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.
- 7.1.4 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.