



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

LAND AT FORMER WERNOS WASHERY, PENYBANC,
CARMARTHENSHIRE

On behalf of
Landview Developments Ltd

Our Ref: 0391.a
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Prepared by: JDE

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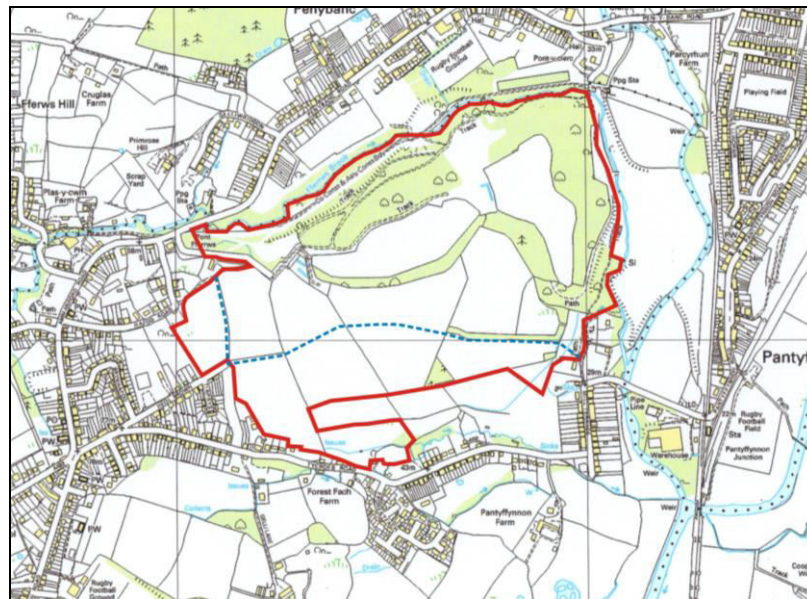
1.0 INTRODUCTION

- 1.1 JCR Planning has been instructed by Landview Developments Ltd (the Land Owner) to prepare and submit a Strategic Candidate Site Supporting Statement for the allocation of land at the former Wernos Washery, Penybanc, Ammanford for the purposes of a mix of uses, including residential, 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 addresses 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 Strategic Candidate Site (SCS) relates to a series of parcels of land amounting in total to just over 60ha and is located at the former Wernos Washery, Penybanc, Ammanford. The extent of the proposed SCS is edged red on the plan below.



Plan A

2.1.2 The Site contains a variety of differing areas, with each influencing the proposal subject of this Statement. At the core of the Site are a series of enclosures that have been determined as the most appropriate area for development. Whilst agricultural in nature, they have a somewhat unmanaged form, although boundary treatments are still well established, as the photographs of this core area below illustrate.



Photograph 1



Photograph 2



Photograph 3



Photograph 4

2.1.3 As can be seen, the majority of this area of the Site is reasonably level, although a gentle slope is present in part of the eastern portion (Photograph 3) of this core area. However, the gradient is not considered significant enough to prevent this area's development, with a further area available for development, should the Authority require it, positioned to the east of the enclosure in question.

2.1.4 To the east and in particular north of the core area can then be found a much higher area of ground, which we understand is a former area of spoil. This area is dominated by wooded slopes with a large level plateau (Photograph 5 and 6) then at its summit.



Photograph 5



Photograph 6

2.1.5 Throughout this area can be found a number of informal tracks, a number of which lead to the area's western boundary that then links up with the former washery area (Photograph 7) and a recently constructed residential development scheme beyond it.



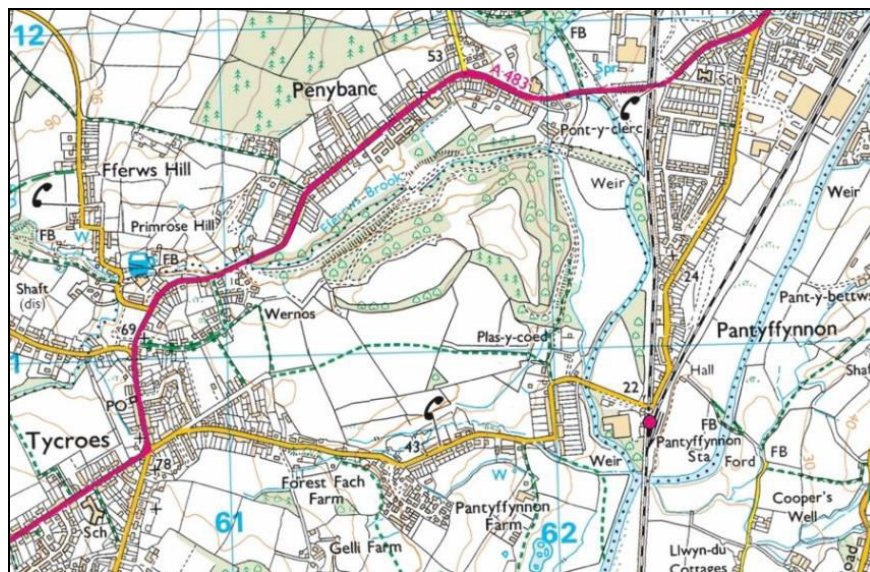
Photograph 7

2.1.6 The final area of the SCS is then located at its western boundary, adjoining the existing built form. This area has historically been used as a formal area of open space by the community (football pitch) – as can be seen below – but this has not seen any maintenance or management for a number of years.



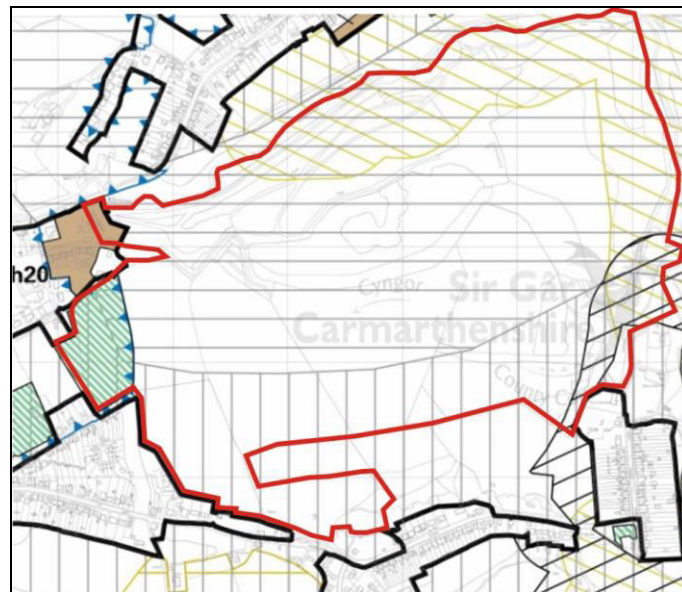
Photograph 8

2.1.7 From an access perspective, the Site is currently accessed for its general management purposes from a vehicular perspective via Heol Brown and from Penybanc Road via the aforementioned recently constructed residential scheme to the north. With regards then to pedestrian means, as Plan B below illustrates, the Site adjoins and is linked to a number of Public Footpaths providing access via foot to the nearby settlements of Tycroes, Penybanc and Pantyffynnon.



Plan B

2.1.8 Under the provisions of the current Carmarthenshire Local Development Plan, the site adjoins the defined Development Limits, as illustrated in the plan below.



Plan C

2.1.9 As can be seen, the Candidate Site adjoins and is well related to the existing defined Development Limits for Tycroes (including an existing housing allocation), but also that of Pantyffynon and Penybanc. Its strategic position therefore means it has an ability to be well related and serve the existing population of three local communities, ensuring therefore it represents a natural and logical location for the expansion of the Growth Area at this location.

2.2 THE ADJOINING SETTLEMENT

2.2.1 As detailed above, the Candidate Site adjoins a number of existing settlements. The existing built form and pattern of the settlements follow key access routes, with then further development leading off those in a typical urban pattern. The larger town of Ammanford is then located a short distance to the north east of the SCS.

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- 2.2.2 Existing residential development is variable in density, but more recent development and that to the east of the Site is of a higher density than some of the older stock found in the locality. It should be noted however, that the SCS due to its historic use is in part brownfield in nature, and so taking into account this factor and its strategic and sustainable position in relation to a number of adjoining communities, a higher density should be secured on the Site.
- 2.2.3 In terms then of the immediate urban area itself, as the accompanying *Transport Assessment* identifies, the Site is located within walking distance of all community facilities and local services present and provided by the adjoining settlement, all of which are within 1km. Access to further facilities in the larger town of Ammanford can then be gained by regular bus services, stops for which are within a short walk of the Candidate Site. The strong sustainable position of the area and the position occupied by the Site within it 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 Master Plan that includes a typical residential density layout for a potential residential led scheme that could be developed on the Site. It should be emphasised that the accompanying drawings are 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 up to 400 residential units (based on the density of that delivered for Phase I) in a deliverable and sustainable manner. Further units could be made available as part of the area marked for a future phase of development, should these be required (Circa. 135). The following information therefore expands on these principles.

3.1 DEVELOPMENT CONSIDERATIONS

3.1.1 A significant level of background research has been undertaken in establishing the suitability of the site in general for development, as well as any potential constraints or obstacles to its delivery. As a result, this Statement and submission is accompanied by the following documentation:

- Preliminary Ecological Appraisal (PEA)
- Stage II Ecological Survey Report (SESR)
- Coal Mining Risk Assessment (Western Area) (CMRA)
- Transport Assessment (TA)

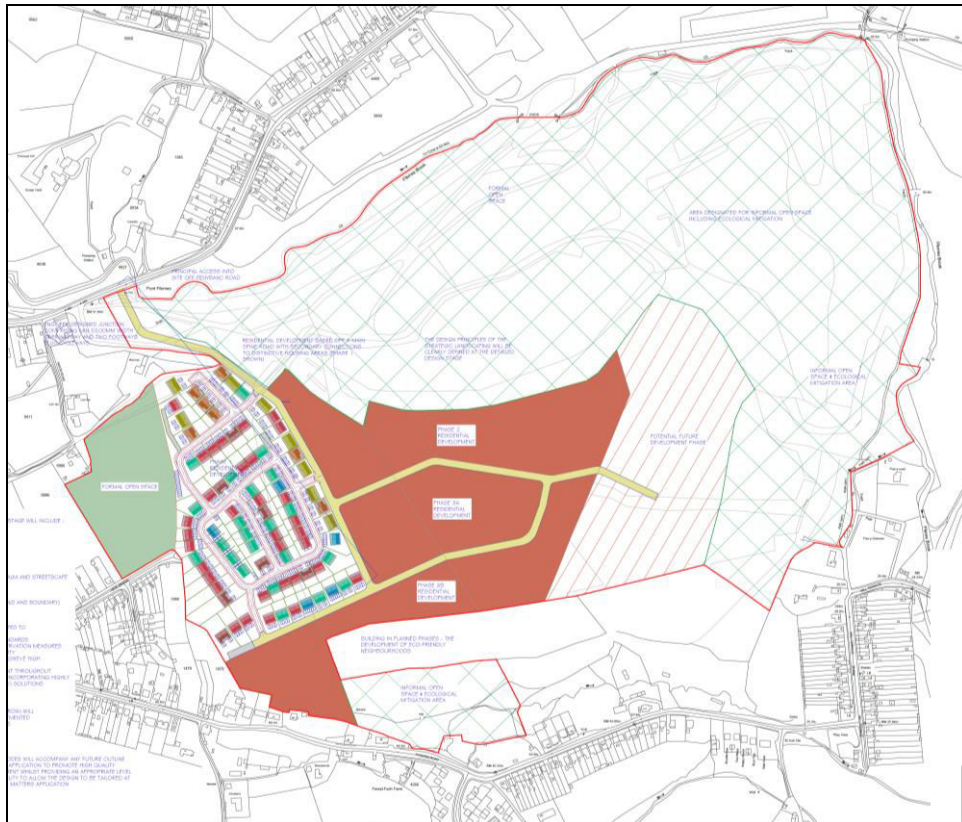
3.1.2 Through the above, a number of key factors have been established. Firstly, a number of areas have been excluded from potential development due to their own ecological value, or their contribution in providing mitigation for the loss of assets elsewhere on the Site. In addition, key assets within the Site that could be retained, whilst still

permitting development within their proximity have also been identified and factored into any strategic development proposals.

- 3.1.3 The work and outcomes of the CMRA have then provided a clearer picture of the Site's historical use pattern, as well as identifying the position of key attributes that would need to be taken into consideration during the Site's development and the level of challenge they would represent. Whilst the work deals primarily with the western portion of the Site, sufficient comfort is given for an element of the eastern portion to also be included as part of the proposed developable area.
- 3.1.4 The final piece of work has then examined all possible highway considerations for the proposal and in particular the likely means of access to serve the scheme. Through this work it has been identified that the principle and only means of access to serve the Site would need to be via the existing residential development at the north of the Site, with any access via Heol Brown being on a pedestrian basis only.
- 3.1.5 The net result of the above and accompanying work therefore has been to steer and inform a strategic layout for the Site that provides a level of comfort to ensure that such proposals are sustainable and deliverable.

3.2 DEVELOPMENT OVERVIEW

- 3.2.1 It is proposed that the Candidate Site be allocated in the forthcoming replacement LDP for a mixed use development, including up to 400 residential units, formal and informal open space, habitat enhancement areas and a possible neighbourhood centre. As detailed above, the accompanying illustrative masterplan (reproduced below) demonstrates that the site is capable of accommodating this mix of uses in a deliverable and sustainable manner.

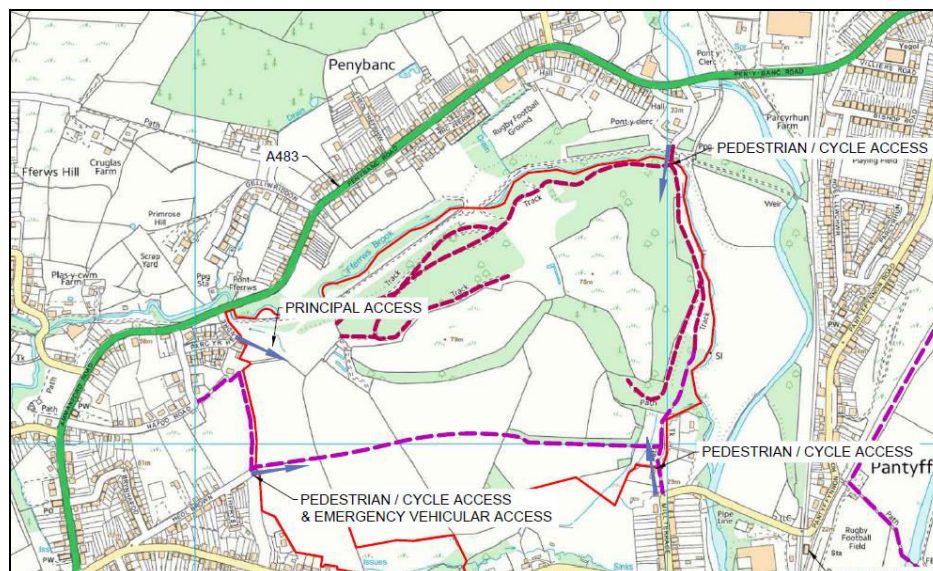


Plan D

3.2.2 As discussed above, the general layout of the Site has been steered by both its assets and constraints. This has then led to its core being the focus of any new development, being accessed via the existing residential scheme to the north. A large area (plateau) to the north and east of this core will remain undeveloped, but will be retained for a mix of informal amenity and biodiversity gain purposes. A small area then to the west of the core will be then be used and developed as an extension to the existing formal open space at the edge of the Site.

3.2.3 As illustrated above, the site is capable of accommodating a mix of unit sizes, as well as those of a single or two storey nature if required. The associated density – 400 units – has therefore taken into consideration this potential mix, as well as recognising the sustainable attributes of the site's position within the existing urban area.

3.2.4 With regards then to access, it is proposed that the SCS would be served in the manner indicated by the drawing at Appendix 4 of the accompanying TA, reproduced below:



Plan E

3.2.5 Within the Site then would run a largely circulatory spine road, off which minor streets would be created. The highway network would link up and connect with the existing Public Footpath running through the Site, as well as create where appropriate links with the existing informal path network adjoining the Site.

3.2.6 As shown in Plan D, the proposal will include the improvement and expansion of the existing formal area of open space within the Site, which will in itself assist in fully integrating the proposed development with the existing urban form. In addition to this, it is recognised and supported that an element of the proposed residential units would be affordable in nature, which under the provisions of the current LDP would be in the region of 10%.

3.3 INFRASTRUCTURE CONSIDERATIONS

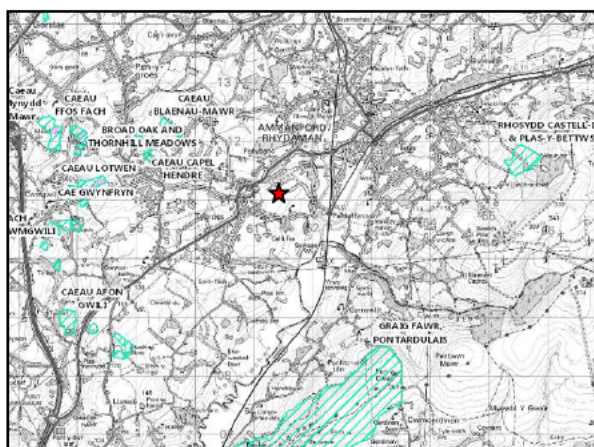
- 3.3.1 Any development of the Candidate Site for residential units would be served by mains water, public sewer and electricity, connections to which either lie within the Site or within the adjoining road network.
- 3.3.2 With regards then to surface water, it is considered that as a result of on-site 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 As detailed above, accompanying this Statement is a *Preliminary Ecological Appraisal* with a follow up *Stage II Ecological Survey Report*. Through these two exercises and their subsequent recommendations, an approach has been outlined as to how an element of the SCS could be developed for the mix of aforementioned uses, whilst also then securing the management and enhancement of other areas for biodiversity gain and the retention of those assets currently present.

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 two designations (hatched green on Plan F) within 3km of the SCS (red star on Plan E), but these are separated by a significant belt of existing urban form.



Plan F

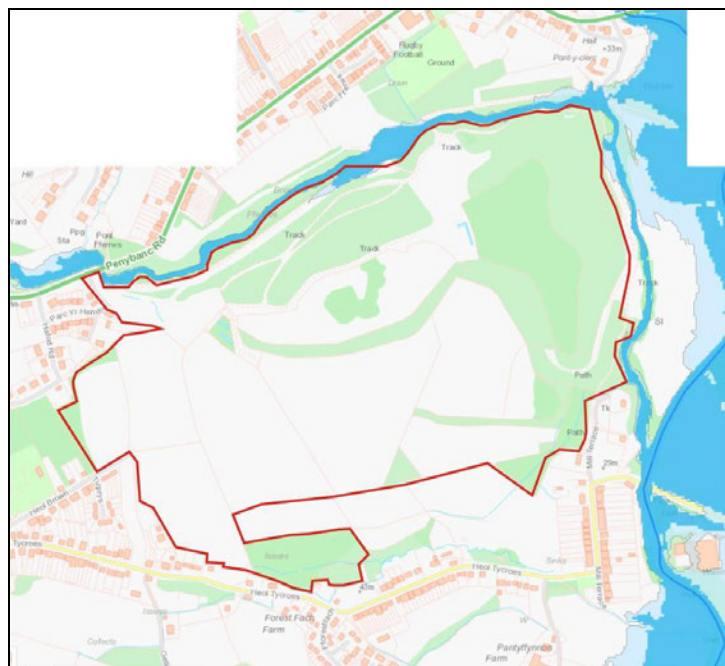
4.1.3 As a result and in view of the above, it is considered that the designations are significantly distant from the site, which will ensure that its development would have no detrimental impact on them.

4.2 HISTORICAL ASSETS

4.2.1 Neither the Strategic Candidate Site or immediate adjoining urban area includes any Listed Buildings or Conservation Areas. The nearest Scheduled Ancient Monument to the SCS is then the Tir-y-Dail Motte and Bailey Castle some 1.5km to its north east. However, due to the separation distance and intervening topography and built form, it is not considered that the proposed development would have any detrimental impact on the setting or interest of this or any other nearby historical asset.

4.3 ENVIRONMENTAL CONSTRAINTS

4.3.1 The developable area of 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 plan below.



Plan G

4.3.2 With regards then to ground conditions, as detailed previously, the matter of the historic use and form of the Site has been fully explored and the results are presented in the accompanying CMRA. Through this document, key areas of

challenge have been identified and whilst could still form part of any development, the viability of any scheme could be enhanced further through avoiding such areas, whilst still delivering the number of units presented in Section 3 of this Statement.

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 Strategic 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 development of the Strategic Candidate Site in question based on an appraisal of its first phase. It is based very much on the Site's current status and uses figures and costings previously accepted by the local authority through its determination of planning applications, as well as those obtained through consultation with developers operating in the locality. The following appraisal is therefore based on the assumptions set out below in order to provide a residual value for the scheme.

Costs

- Dwelling construction costs are based on £850 per metre.
- Adoptable Road construction cost based on £1,200 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 viability appraisal for a detailed indicative layout prepared for Phase I of the SCS (being then typical for the remainder of the SCS), which proposes 157 units, with an affordable housing level of 10% (based on 8 three beds and 8 two beds).

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
2 Bed House (102 sqm)	86700	66	5722200
3 Bed House (110 sqm)	93500	54	5049000
4 Bed House (128 sqm)	108800	14	1523200
4 Bed House (144 sqm)	122400	16	1958400
5 Bed House (246 sqm)	209100	7	1463700
Road Construction	1200	1336	1603200
Shared Access Drives	400	115	46000
Utility Connections	5000	157	785000
Professional Fees	-	-	1235929
Sprinklers	3500	157	549500
Total			19936129
Sales			
2 Bed House (Affordable)	65110	8	520880
3 Bed House (Affordable)	76380	8	611040
2 Bed House (102 sqm)	150000	58	8700000
3 Bed House (110 sqm)	175000	46	8050000
4 Bed House (128 sqm)	210000	14	2940000
4 Bed House (144 sqm)	230000	16	3680000
5 Bed House (246 sqm)	275000	7	1925000
Total			26426920
Developers Profit	Total		3964038
Residual Land Value			2526753

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.

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 5-8 years from the adoption of the replacement LDP, as well as in a phased manner within this time period.

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 SCS, 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 adjoining urban area 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 SCS 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 on three sides and being positioned at a location within the wider landscape to not form a prominent or logical part of the surrounding open countryside.
- 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 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.