



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

LAND OFF WAUNFARLAIS ROAD, LLANDYBIE

on behalf of
Mr J Morris

Our Ref: 1605.a
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1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. has been instructed by Mr J Morris to prepare and submit an Alternative Allocation Report for the allocation of land adjoining Waunfarlais Road, Llandybie for the purposes of residential development in the forthcoming replacement *Carmarthenshire Local Development Plan* (LDP). Submissions for the Site were made at the Candidate Site Stage (LPA ref. No. SR/082/002), but the Council determined to exclude the Site for the following reasons:

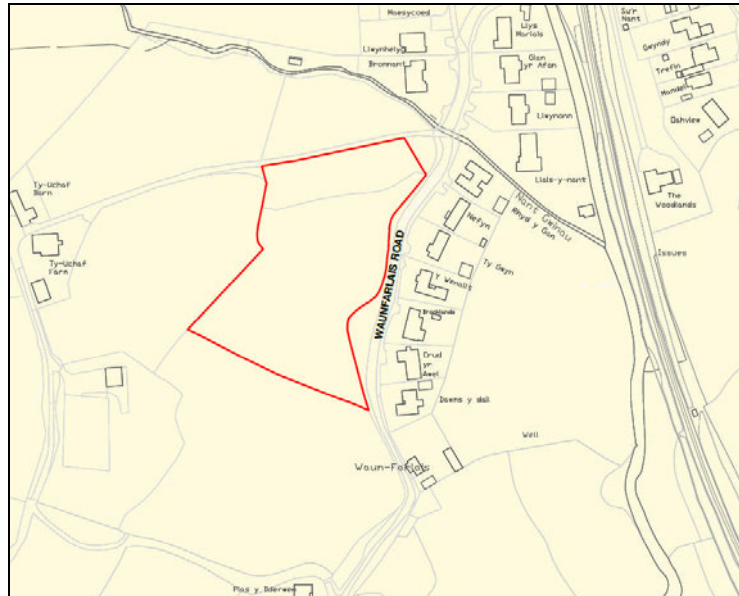
“Development of the site would result in a ribbon pattern of development contrary to general planning principles. Furthermore, the access roads to the site falls within the C2 flood zone as identified in the TAN15 Development Advice Maps.”

- 1.2 This report has therefore been prepared in response to the above and provides further information, highlighting the suitability of the Site for allocation for housing development. It has been prepared in line with the Authority’s published site assessment and selection documents. The contents of this report therefore address each point raised within these documents as well as ensuring that it complies with regards to the guidance and requirements of *Planning Policy Wales (Edition 11)* when it comes to the preparation of development plans and the allocation of land for residential purposes as part of them.
- 1.3 The contents of this report therefore provide a comprehensive case for the allocation of the land for residential development purposes, and it should also be read in conjunction with the accompanying information (submitted at the Candidate Site Stage), as well as a sustainability assessment undertaken in-line with the Authority’s requirements.

2.0 SITE CONTEXT

2.1 THE SITE AND CURRENT CONTEXT

2.1.1 The Alternative Site relates to land measuring approximately 1.1ha in area in total, edged red on the plan and the photograph below.



Plan A



Photograph 1

2.1.2 As can be seen from the aerial photograph above and the accompanying information, the Alternative Site consists of two parcels of semi-improved grassland, each strongly defined by mature hedge lines and trees. In terms of topography, the sites slopes gently downwards in its southern portion, leading then to its more level element in its northern half.

2.1.3 Access to the site is currently gained via an existing farm entrance lane (Photograph 2), but any future development of the Site would gain access directly off Waunfarlais Road, which runs along the Site's eastern boundary.



Photograph 2

2.1.4 Under the provisions of the current Carmarthenshire LDP, the Site presently lies at the southern edge of the defined Development Limits of the settlement of Llandybie. However, as the extract of the Proposals Map below illustrates, the Site (outlined in red) adjoins the current built form of the urban area directly to the north west, with the existing development limits extending along its frontage on the opposite side of the road to the east, and beyond to the south.



Plan B

2.1.5 As can be seen, the Alternative Site is therefore well related to the existing defined Development Limits for Llandybie and the settlement's built form as a whole when existing residential development directly to its north west and east is taken into consideration. Its position and proposed use therefore represent a natural and logical location for the settlement's expansion, as well as an example of natural rounding-off of the existing built form.

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, including the following:

- Primary School
- Village Hall
- Several Retail Units (A1 and A3)
- Several Public Houses (A3)
- Several Places of Worship

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, the nearest of which to the Alternative Site is at the junction of Waunfarlais Road/McKays with Bonllwyn Road to the east. 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 Llandybie forms part of the wider Principal Centre as defined by the 2nd Deposit LDP, where the Council expects much of the planned growth in the County to take place. However, two of the proposed housing allocations (PRC3/h19 and PrC3/h37) have already been constructed or will be near completion by the time the Replacement LDP will be adopted. This is worrying considering the sustainable credentials of Llandybie as a settlement and so further deliverable allocations for the settlement should be considered.

2.2.5 The above is particularly important as having undertaken a comprehensive review of the proposed allocations put forward by the 2nd Deposit LDP for the Principal Centre in question, it has been identified that a number have significant questions over their ability to be delivered within the Plan period, including the following:

Ref. No.	Site Name	Units
PrC3/h4	Tirychen Farm	150
PrC3/h36	Betws Colliery	60
PrC3/h14	Nantydderwen, Tumble	33
PrC3/h22	Adj. to Pant y Blodau, Penygroes	79
PrC3/h2	Heol Gelynen, Brynamman	8

Table 1

2.2.6 As a result of the above, separate objections have been made in relation to the above allocations and it is therefore important that alternative more deliverable sites should be identified, to ensure the Plan can be regarded as being 'sound'.

3.0 THE PROPOSAL

3.0.1 As part of the requirements for the promotion of sites for residential development, an indicative layout drawing was prepared as part of the original Candidate Site Stage submissions. It should be emphasised that the accompanying layout is for illustrative purposes and that other design solutions for the site could also be reached. Notwithstanding this, the accompanying layout drawing has taken account of all the potential assets and constraints of the Site, as well as current Authority design guidance, and demonstrates that it is capable of delivering 7 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 7 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 C

3.1.2 As illustrated above, the site is potentially capable of accommodating a mix of unit sizes and types, with the associated density – 7 units – having therefore taken into consideration this potential mix. The form of development for the Alternative Site is also capable of respecting and retaining its current means of enclosure and natural boundary features both at the edge and within the Site.

3.1.3 With regards then to access, it is proposed that the Alternative Site would be served by a single point of access serving a short section of adopted highway. From this then would be further private shared drives as required.

3.2 INFRASTRUCTURE CONSIDERATIONS

3.2.1 Any development of the Alternative Site for residential units would be served by mains water, public sewer and electricity, connections to which we understand lie within or in close proximity to the Site.

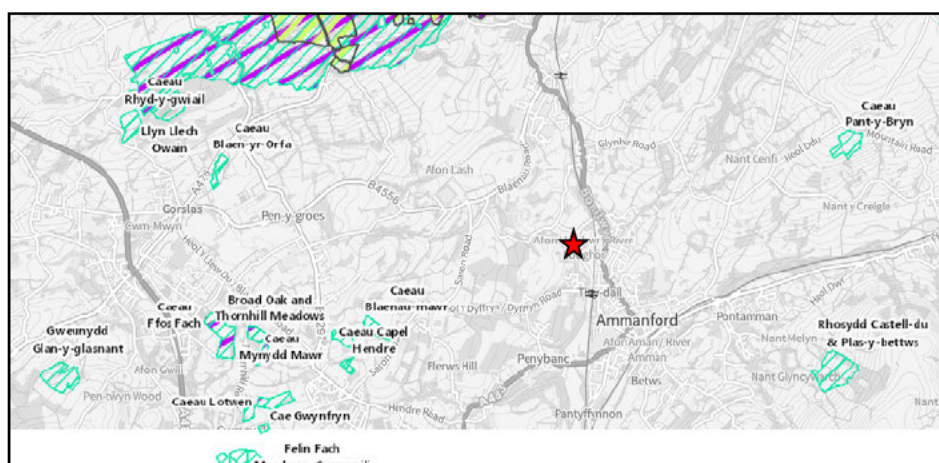
3.2.2 With regards then to surface water, it is considered that as a result of on-site features, there would be a number of options available to any development of the site in terms of its disposal, ensuring its development adheres to current regulatory requirements.

4.0 ENVIRONMENTAL CONSIDERATIONS

4.1 ECOLOGICAL ATTRIBUTES

4.1.1 The Site does not contain any protected flora or fauna, or signs of their presence. Notwithstanding this, any potential biodiversity assets the Site may include have been given full consideration with regards to exploring its potential for residential development. This has included the proposed retention and management of existing site boundary features.

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



Plan D

4.1.3 As can be seen from the above, the Alternative Site does not form part of and neither is it near any national or local designations. Although a number are within 2-4km of the site, due to the intervening distance and topography, the development of the Alternative Site will not have any detrimental impact on these features.

4.2 HISTORICAL ASSETS

4.2.1 Below is an extract from the 'Archwilio' website that represents a resource for the Historic Environment Records of Wales, with the Alternative Site indicated by a red star.



Plan E

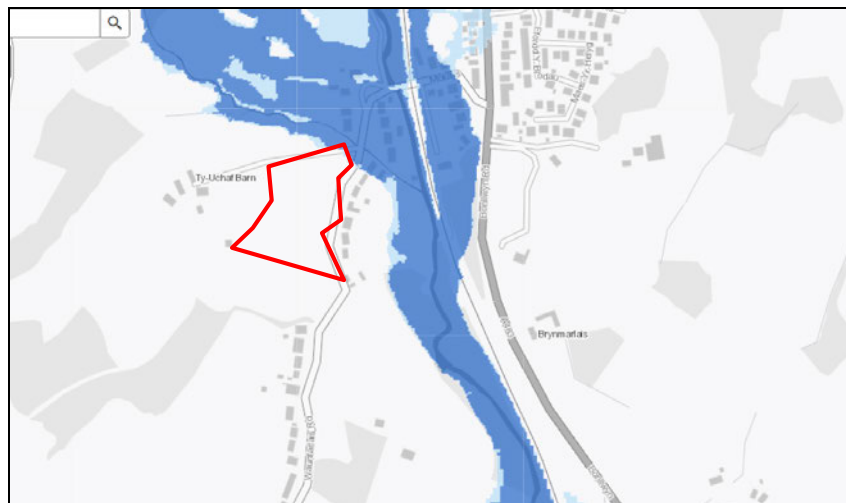
4.2.2 Whilst the Llandybie's core includes a number of Listed Buildings, as can be seen, neither the Alternative Site nor immediately adjoining element of the settlement includes any Scheduled Ancient Monuments, Listed Buildings or Conservation Area's. As a result, the development of the Site would not have any detrimental impact on the setting or interest of any nearby historical asset.

4.3 ENVIRONMENTAL CONSTRAINTS

4.3.1 As detailed above, in their assessment of the Site at the Candidate Site Stage, the Council justified its exclusion of the Site as a housing allocation, in part, due to in its view "...the access roads to the site falls within the C2 flood zone as identified in the TAN15 Development Advice Maps.". Below therefore are extracts of the current Development Advice Maps or those produced by Natural Resources Wales, with the Alternative Site edged red.



Plan F
(Development Advice Maps)



Plan G
(Flood Maps for Planning)

4.3.2 Based on the above plans, the Council's stance is somewhat confusing. As can be seen, no element of the Site – access road or otherwise – lies within any defined flood risk zone in terms of either the DAM or the Flood maps for Planning. On this

basis alone, the Council's assessment of the site is erroneous and quite clearly inconsistent when compared with other allocations it has put forward for the settlement (e.g. PrC3/h21 – Maespiode). In summary, flood risk would not prevent the delivery of the Alternative Site.

- 4.3.3 In terms of ground conditions, due to its greenfield nature, the Candidate Site has no ground contamination related constraints.

5.0 VIABILITY

5.0.1 As part of the preparation of any development plan, it is vital to ensure that allocations within it are both viable and deliverable. To not make efforts to explore both these aspects is to then risk that the Plan may be unsound and so in turn fail to meet its own targets or objectives.

5.0.2 Although detailed viability appraisals are difficult to prepare at this stage of the Plan's preparation due to the absence of, for example, such things as full engineering details, it is possible to undertake such appraisals at a strategic or in-principle level. The following therefore represents such a process and is fit-for-purpose in providing confidence with regards to both the viability and deliverability of the Alternative Site at this stage, but it should be noted, that more detailed analysis at a planning application stage may result in some variance.

5.1 VIABILITY APPRAISAL

5.1.1 The following provides an indication of the viability of delivering the proposed 6 units on the Alternative Site in question. It is based very much on its greenfield status and uses figures and costings previously accepted by the local authority through its determination of planning applications and other works. The following appraisal is therefore based on the assumptions set out below in order to provide a residual value for the scheme, prior to ascertaining an indicative land value.

Costs

- Dwelling construction costs are based on £1,300 per metre given that bespoke four bed detached houses (200 sq.m.), with a medium grade of internal finishing.
- Adoptable road construction cost based on £1200 per metre
- Connections for all utilities include water, foul water and electric
- Developer's Profit based on RICS guidelines (18%)

- Professional Fees include planning application fee, associated professional fees, estate agency fees (1%) and LABC Warranty fee.

Sales

- Sale Prices based on LPAs Affordable Housing SPG, market research and ACG figures where relevant.

5.1.2 Using the above, the following represents a strategic viability appraisal for the proposed 7 units, based on an affordable housing level being a financial contribution of £41.98 per square metre of internal floorspace.

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
5 Bed semi (200 sqm)	270000	7	1890000
Utility Connections	5000	7	35000
Road and Access	1200	50	60000
Professional Fees	-		55020
Sprinklers	3500	7	24500
Affordable Hsng. Cont.			58772
Parks and Education Cont.	5000	7	100000
Total			2223292
Sales			
5 Bed semi(200 sqm)	500000	7	3500000
Total			3500000
Developers Profit	Total		630000
Residual Land Value			646708

Table 2

5.1.3 Although the above figures have not been able to take into account any future changes to construction costs as a result of other external factors (e.g. changes to Building Regulations), it is considered that in-principle, the development of the site would be financially viable.

5.2 DELIVERABILITY

- 5.2.1 In terms of deliverability, it should be firstly noted, as illustrated above, that the site is financially and physically viable, with no environmental, geo-physical or technical constraints prohibiting immediate development. Furthermore, there are no ownership or third-party interests preventing the site's delivery.
- 5.2.2 In terms of a delivery timescale, it is envisaged that the site could be capable of being completed within 2 years from the adoption of the Replacement Local Development Plan.

6.0 NATIONAL PLANNING POLICY CONSIDERATIONS

6.0.1 In the preparation of any development plan, consideration must be given to national policy and guidance. At present, this takes the form of *Planning Policy Wales* (PPW) (Edition 11) and a series of Technical Advice Notes (TAN) that deal with a range of topic areas.

6.1 HOUSING SUPPLY

6.1.1 With regards to the provision of housing, Paragraph 4.2.2 of PPW gives the following requirements the planning system must fulfil:

- *Identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;*
- *Enable the provision of a range of well designed, energy efficient, good quality market and affordable housing that will contribute to the creations of sustainable places; and*
- *Focus on the delivery of the identified housing requirement and the related land supply*

6.1.2 In addition to the above, Paragraph 4.2.10 of PPW states “*the supply of land to meet the housing requirement proposed in a development plan must be deliverable*”. As detailed previously, it is considered that the LPA has to date failed to accomplish this requirement under the provisions of the current LDP and will continue to do so under the provisions of the proposed allocations of the 2nd Deposit LDP.

6.1.3 In order therefore to re-dress this deficiency in provision, and provide a more robust approach to housing provision through a mixed site-scale approach, there is an urgent need to identify alternative deliverable housing allocations in the replacement Plan. Based on the accompanying information, it is clear that the Alternative Site represents one such example.

7.0 CONCLUSION

- 7.1 Although currently undeveloped, the Alternative Site forms a logical extension to an existing settlement, being well related to it and being positioned at a location within the wider landscape to not form a prominent or logical part of the surrounding open countryside. Its inclusion within the development limits would also represent a logical rounding off of the current built form, providing a defensible boundary with respect to the surrounding open countryside beyond the Alternative Site.
- 7.2 In addition to the above, the site lies within close proximity and walking distance of the existing community services and local facilities of the adjoining settlement. From a wider sense, the Site will also benefit from well served excellent public transport links to the adjoining larger conurbation of Ammanford and indeed Cross Hands and Carmarthen, together with other locations within and adjoining the County, further increasing the facilities and services available to future residents of the Site via sustainable transport means.
- 7.3 In tandem to the above, the development of the Site will in turn ensure a viable and so deliverable source of future housing for the area it forms part of, which has seen a dangerous level of under supply prior to and since the adoption of the current LDP. The development of the Site will help to redress this imbalance and it is strongly suggested that the Authority closely scrutinises those sites currently allocated in the LDP in terms of their suitability and deliverability if it is to continue to allocate them. National planning policy however would suggest that in view of the uncertainty in relation to their delivery, such sites should not form part of the replacement LDP.
- 7.4 With the Alternative Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable candidate for future housing development.

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