

### **CANDIDATE SITE SUPPORTING STATEMENT**

# <u>FOR</u>

# REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN 2018-2033

### LAND OFF HEOL CENNEN, FFAIRFACH, CARMARTHENSHIRE

On behalf of Mr and Mrs Green

Our Ref: 0597.a Date: August 2018 Prepared by: JDE

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### **1.0** INTRODUCTION

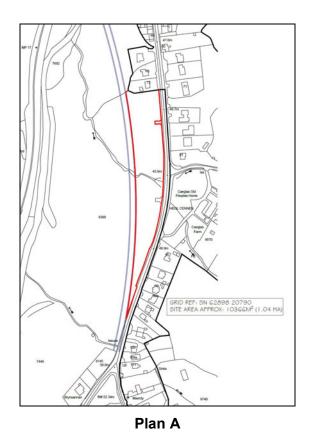
- 1.1 JCR Planning has been instructed by the land owners to prepare and submit a Candidate Site Supporting Statement for the allocation of land off Heol Cennen, Ffairfach for the purposes of residential development in the forthcoming replacement Carmarthenshire Local Development Plan.
- 1.2 This Statement 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 part of two existing agricultural enclosures measuring1.04 hectares in area and is edged red on Plan A below.



2.1.2 As detailed above, the Site consists of two parts, both of which are laid to grass as shown by the photographs below.





Photograph 1

Photograph 2

2.1.3 The two parcels are then split by a small ravine feature, formed by a small stream at its base (Photograph 3).



Photograph 3

- 2.1.4 The Site as a whole contains no buildings or hardstandings and so is wholly greenfield in nature. The Site's northern and eastern boundaries are then currently defined by a mix of hedgerows and stock proof fencing. It's remaining western boundary is then currently undefined, but follows and respects the anticipated line of the proposed Llandeilo Bypass project, as advised by the Welsh Government.
- 2.1.5 Access to the Site is currently gained via field gates in its eastern boundary, leading on to the adjoining A483. The alignment of the road at this location is particularly straight, resulting in a good level of visibility in both directions, as illustrated in the photographs below.

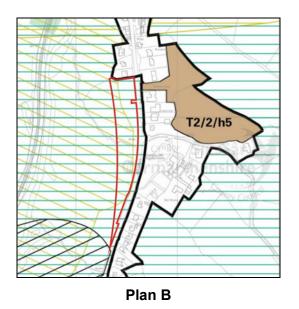




Photograph 4

Photograph 5

2.1.6 Under the provisions of the current *Carmarthenshire Local Development Plan*, the site lies in close proximity to the Development Limits for the settlement of Ffairfach, as illustrated in the plan below.

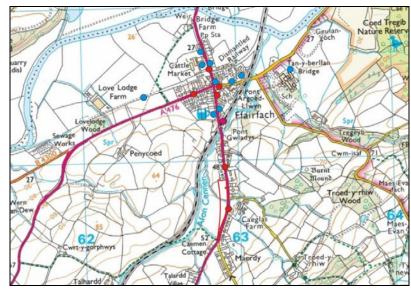


2.1.7 The Candidate Site therefore clearly forms a logical part of the settlement of Ffairfach, particularly when the proposed route of the Llandeilo Bypass is taken into consideration.



#### 2.2 THE ADJOINING SETTLEMENT

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



Plan C

- 2.2.2 From an accessibility perspective, Ffairfach 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) and a train station on the Heart of Wales line. The bus services serving the settlement are numbers 103 and X13, which provide regular access to the following larger settlements, as well as the intervening villages:
  - Carmarthen
  - Llandovery
  - Ammanford
- 2.2.3 The very strong sustainable position of Ffairfach 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 a number of Service Centres identified by the LDP (combined with Llandeilo). Such settlements are designed to support and contribute towards the growth of nearby Growth Areas in this instance Cross Hands and Ammanford and so in themselves include a number of housing allocations to assist with this role during the Plan period. However, none of the housing allocations within T2/2 (Llandeilo including Ffairfach) have as of yet been delivered, 3 years since the Plan's adoption.
- 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 either 'Red' or 'Amber' by the Authority for Service Centre T2/2.

LDP Ref.	Site Name	Units
T2/2/h1	Llandeilo Northern Quarter	215
T2/2/h2	Land opp. Pantglas	6
T2/2/h3	Land north of Pantglas	6
T2/2/h4	Thomas Terrace	5
T2/2/h5	Caeglas, Ffairfach	25
T2/2/h6	The Old Tannery	6

Table	1
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2.2.6 From the above table, there are a total of 31 'red' units – those considered unlikely to be delivered by the Authority – with the remainder then being categorised as 'amber'. Whilst it is recognised that some of the above have been the subject of planning permissions in the past, none of the allocations have delivered any units during the LDP's lifespan, nor indeed when many were allocated as part of the provision of the previous *Carmarthenshire Unitary Development Plan*. As a result, despite being earmarked for development for over 12 years, all of the above allocations have failed to deliver any new housing within the identified Service Centre.



2.2.7 The net result of the above is that despite the Service Centre 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. Whilst we recognise the continued strategic importance of allocation T2/2/h1 to the Town, the deliverability of the remaining longstanding allocations is clearly in doubt and so in order to redress this deficit in provision, and capitalise on the sustainability of the Service Centre, more deliverable and varied residential allocations are required.



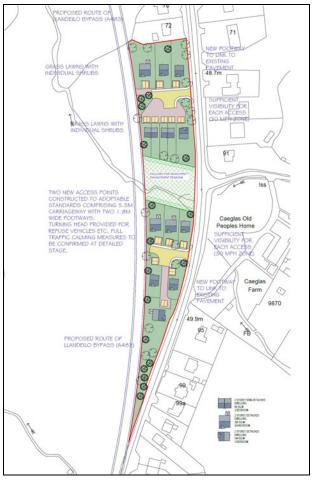
## 3.0 THE PROPOSAL

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 14 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 14 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 immediate setting and topography.







- 3.1.2 As illustrated above, the site is capable of accommodating a mix of unit sizes, but due to its location and the immediate setting, it is suggested that such units would be two storey in scale. The associated density 14 units has therefore taken into consideration this potential mix, as well as striking a balance of being reflective of the existing form and density of residential development in the immediate locality, as well as the shape and form of the Candidate Site.
- 3.1.3 With regards then to access, it is proposed that each unit would gain access either directly off the adjoining public highway as suggested by the accompanying Transport Statement, or via new shared access roads as shown on the above illustrative layout. In addition, the existing ravine and its associated tree line would be retained and could assist with the Site's surface water management scheme.



3.1.4 Due to the proximity of existing facilities and the Site's scale, the proposal does not include any formal equipped 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 4 units on-site.

#### 3.2 INFRASTRUCTURE CONSIDERATIONS

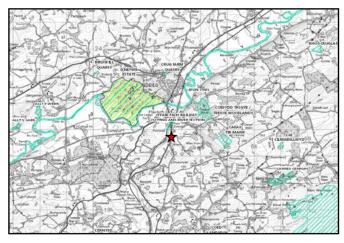
- 3.2.1 Any development of the Candidate Site for residential units would be served by mains water and electricity, connections to which lie within the adjoining stretch of public highway. We understand then that foul water would be dealt with by means of a connection to the public sewer system, which we understand runs within the Candidate Site boundaries or along its edge.
- 3.2.2 With regards to surface water, none of 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 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 The Candidate Site, as illustrated in previous photographs, is actively used and manged for the purposes of agriculture and so is subject to the usual nutrient management practices. However, any existing hedgerows would be retained as part of the Site's wider development, ensuring that 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 NNR, 6 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.



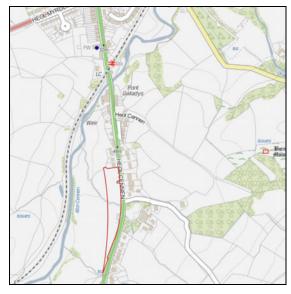
Plan E

4.1.3 However, as can be seen from above, due to the designations distance from the site and intervening existing development, these factors will then ensure that the Candidate Site's development would have no detrimental impact on the aforementioned designations.



#### 4.2 HISTORICAL ASSETS

4.2.1 Ffairfach contains a range of Listed Buildings, with the nearest to the Candidate Site shown by the blue solid circle on the Plan below.



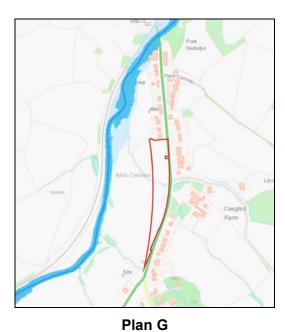
Plan F

- 4.2.2 Notwithstanding the number and proximity of the Listed Building's illustrated above, there are intervening features and development that would ensure that a carefully designed scheme for the Candidate Site could be delivered without detriment to their setting or historic interest.
- 4.2.3 There are then no Scheduled Ancient Monuments (SAM) within or adjoining the Candidate Site, but 1 lies within 3km of it. However, this is at a significant distance from the Candidate Site and due to this and intervening topography and land uses, the development of the site would not have any detrimental impact on the setting or historic interest of these or any other SAM.

#### 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, as illustrated by the relevant extract shown in Plan G below.







4.3.2 Due to its greenfield nature and historic agricultural use, the Candidate Site has no ground contamination related constraints. In addition, in the absence of any historical mining in the area, the site has no ground stability 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 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 14 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.

#### <u>Costs</u>

- Dwelling construction costs are based on £950 per metre (due to their likely bespoke nature).
- Construction of adoptable highway 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.



#### <u>Sales</u>

- 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 14 units, with 4 two bed units being affordable in nature.

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
2 Bed Semi Detached	83600	4	334400
3 Bed Detached	136800	4	547200
4 bed Detached	190000	6	1140000
Adoptable Road	1200	100	120000
Utility Connections	5000	14	70000
Professional Fees	-	-	72024.4
Sprinklers	3500	14	49000
		Total:	2332624.4
Sales			
3 Bed Detached	275000	4	1100000
4 bed Detached	325000	6	1950000
Two Bed (Affordable)	65110	4	260440
		Total	3310440
Developers Profit		Total	496566
		Residual Land Value	481249.6

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 an on-site contribution towards the provision of affordable housing.

#### 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's 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, when the actual physical form and extent of the settlement of Ffairfach is appreciated and taken into consideration, the Candidate Site forms a logical extension to its current form. It can in fact conceivably be categorised as a form of 'infill development' due to the presence of existing development to the north, south and west, particularly when the alignment of the proposed bypass is taken into consideration. The Site's development therefore, could be delivered without resulting in a detriment to visual amenity in the immediate and wider setting of the landscape and adjoining settlement of Ffairfach.
- 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 towns of Llandeilo, Carmarthen and 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 Service Centre 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 Within 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.

