



ALTERNATIVE SITE SUPPORTING STATEMENT
FOR
REPLACEMENT CARMARTHENSHIRE LOCAL
DEVELOPMENT PLAN 2018-2033

LAND PART OF PENYWAUN FARM,
CWMGARW ROAD, UPPER BRYNAMMAN,
CARMARTHENSHIRE

On behalf of Mr. J. Davies

Our Ref: 1600.a
Date: March 2023
Prepared by: Richard Banks

Email: [REDACTED]

Tel: [REDACTED]

Web: www.evansbanks.com

1.0 INTRODUCTION

- 1.1 Mr J. Davies (the Land Owner) have instructed Evans Banks Planning Limited to prepare and submit an Alternative Site Supporting Statement for the inclusion within defined settlement limits of land part of Penywaun Farm, Cwmgarw Road, Upper Brynamman, Carmarthenshire 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 the set criteria, determining the issues and each qualifying point raised within these documents. Consideration has also been given to ensuring that this formal submission complies with the guidance and requirements of *Planning Policy Wales (Edition 11)*, in relation to the preparation of development plans and the allocation of land for residential purposes as part of that preparation process.
- 1.3 The contents of this Statement therefore provide a comprehensive case for the inclusion of the land for residential development purposes within the defined settlement limits of Brynamman, and it should also be read in conjunction with the accompanying supporting information and indicative site layout plan.
- 1.4 This site did form part of a much larger Candidate Site formally presented to the Council in August 2018, and referenced **SR/015/007**. Consideration has subsequently been given by our client as to the extent of site sought under the LDP process, following the conclusions of the Council in their Site Assessment Table (January 2023). The Council consider that *"A small part of the site comprises frontage land between two existing properties and will remain within development limits. Development of the remainder of the site would lead to an unacceptable extension to the settlement. Sufficient residential opportunities exist within the*

settlement.” This Statement seeks to examine that conclusion, and analyses the Alternative Site put forward and claim by the Council that “*sufficient residential opportunities exist within the settlement.*”

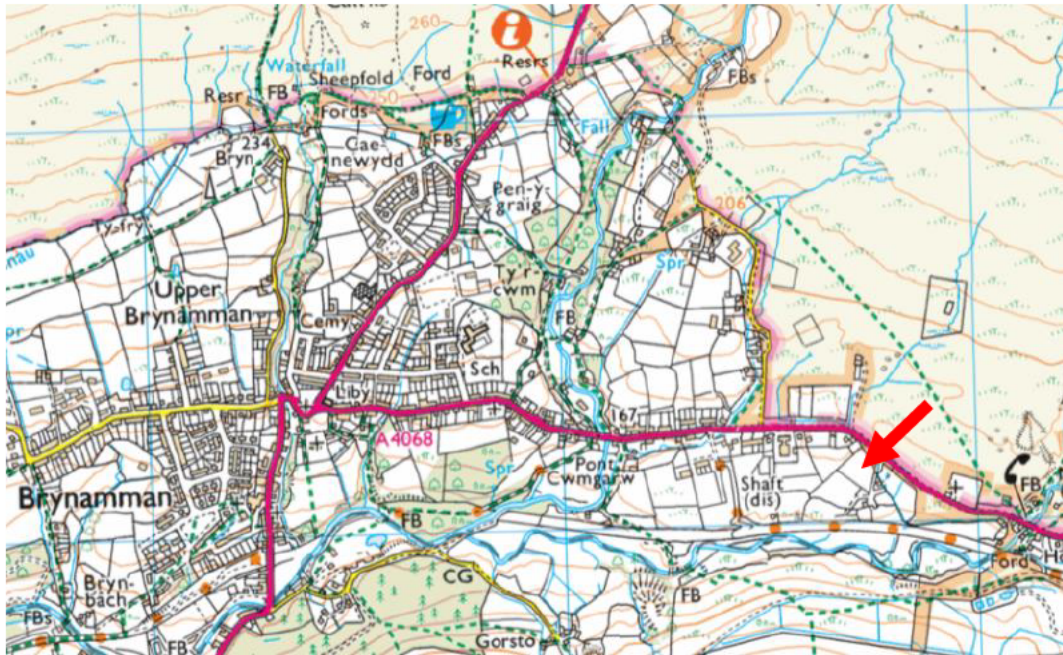
2.0 SITE CONTEXT

2.1 THE SITE

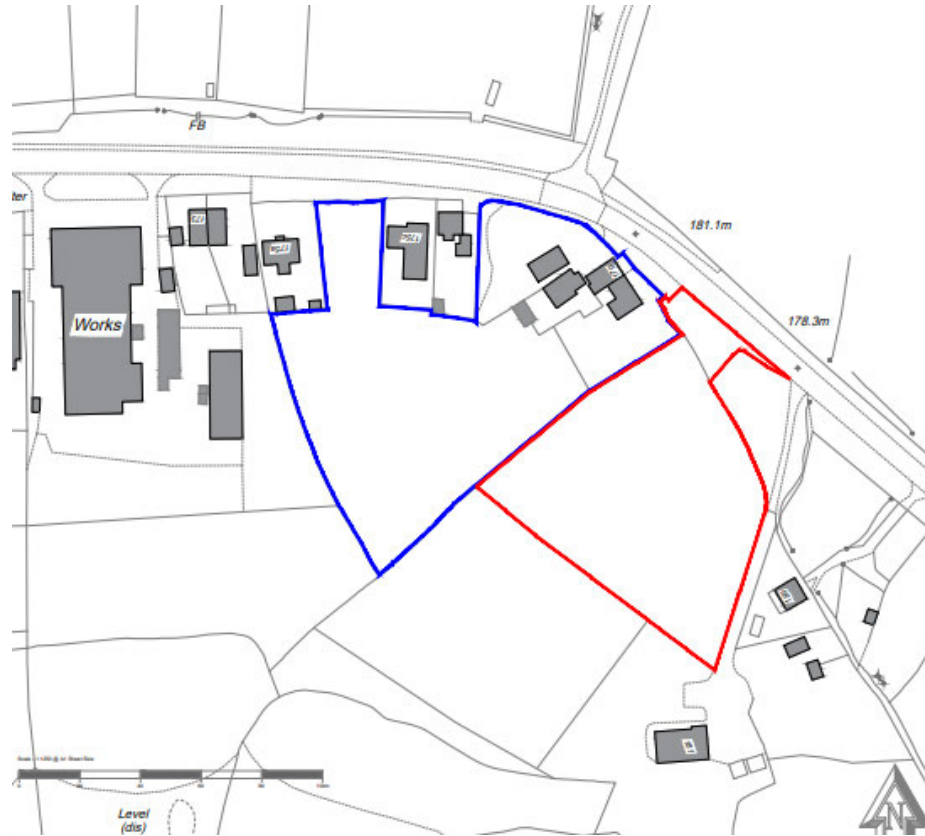
- 2.1.1 The Alternative Site relates to a parcel of undeveloped agricultural pasture which is set off the southern flank of Cwmgarw Road, being the A4068 Road within the eastern edge of the village of Upper Brynamman. The field parcel is irregular in shape and extends to a gross area of 1.3 acres (0.53 hectares). The northern part of the field is separated from the adjacent highway by a copse of semi-mature and younger trees, but there remains an access track and agricultural gateway to the enclosure, which is grazed with sheep. It has a continuous boundary around its perimeter consisting of hedgerows and mature trees, with the western perimeter flanking the Penywaun Farmhouse, and its associated domestic curtilage.
- 2.1.2 Grazing fields extend to the south and south-west, with individual properties at No.'s 181 and 185 Cwmgarw Road being set off long, unmade access tracks off Cwmgarw Road, marking the eastern side of the Alternative Site. Penywaun Farm is actually also functioning as a transport haulage yard, set immediately off the rear of that dwelling. The yard is triangular in shape and level, accommodating a range of workshop outbuildings, swaths of hard surfacing and open storage. To the west of that yard lies the former Remploy Industrial Workshops and yard, which now accommodates a range of employment uses.
- 2.1.3 The southern flank of the A4068 Road comprises of more established, older residential properties set fronting that highway, and set back to allow front curtilages to the highway edge. This is in complete contrast to the northern flank where the setting is completely open to moorland and common grazing rights, ascending for

several dozen square miles north over the Black Mountain, and falling within the Brecon Beacons National Park.

- 2.1.4 The parcel of land is identified in red by Plan A, which illustrates its wider position within the settlement of Brynamman and shows the existing consolidated form of modest industrial estate and frontage development to the A4068 Road. Plan B provides a detailed Ordnance Survey map extract with the site perimeters identified.



Plan A – wider setting of Brynamman with site highlighted



Plan B – detailed OS Plan of Alternative Site

2.1.5 Photographs of the Alternative Site are reproduced below, showing its current March 2023 condition and form. The Alternative Site is relatively level, and is well grazed to the extent that no overgrowth vegetation is visible. All mature perimeter trees appear in good health which warrant retention. A wide overgrown verge lies off the back edge of highway.



Photo 1 – view of level field from gateway entrance



Photo 2 – view of western perimeter and Penywaun Farmhouse



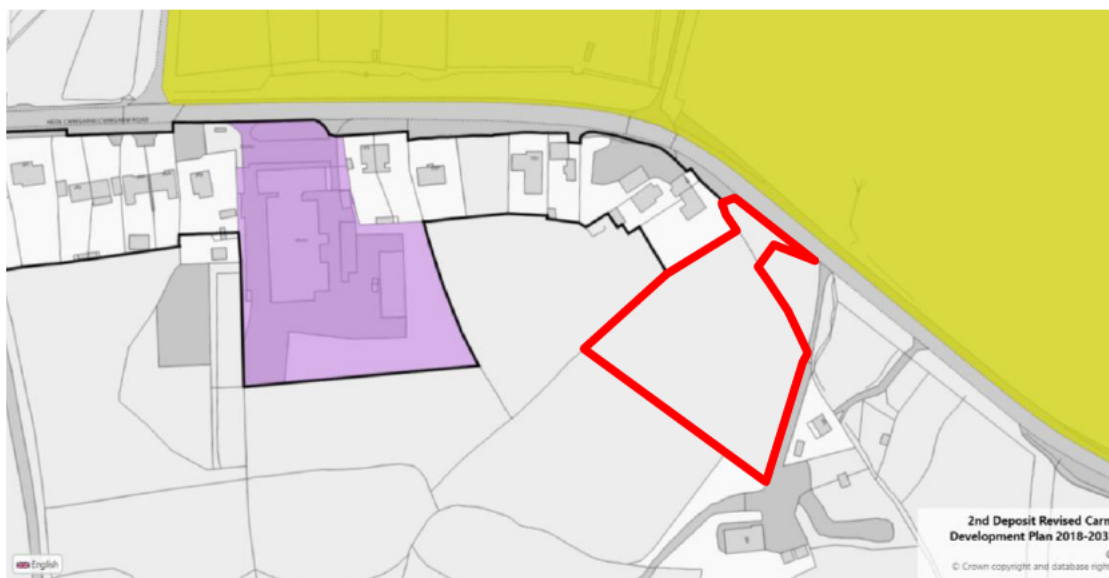
Photo 3 – view to left (west) from existing access onto A4068 road illustrating excellent visibility and wide apron to highway



Photo 4 – view to right (east) from existing access onto A4068 road illustrating excellent visibility

2.2 SETTLEMENT SUSTAINABILITY AND SITE SETTING WITHIN THE CURRENT ADOPTED LOCAL DEVELOPMENT PLAN & SECOND DEPOSIT DRAFT (FEBRUARY 2023)

2.2.1 Under the provisions of the current adopted Carmarthenshire Local Development Plan, the proposed land adjoins the Settlement Limit of Brynamman. The site is shown edged in red at Plan C below:



Plan C – Second Deposit Draft of Brynamman

2.2.2 As can be seen, the Alternative Site adjoins and is well related to the draft defined Development Limits of Brynamman. At present the development limits are drawn tightly about the existing settlement form at Cwmgarw Road. The Alternative Site seeks to mirror the development depth of the existing employment site on the same, southern side of the A4068, but a buffer zone can be provided between existing employment and proposed residential developments in land in the client's ownership.

2.2.3 Upper Brynamman has good accessibility to the nearby settlements of Lower Brynamman and Gwaun Cae Gurwen, and towns of Pontardawe to the south and Ammanford to the west, and its links via the A4068 Cwmgarw Road to Ystalyfera and Ystradgynlais.

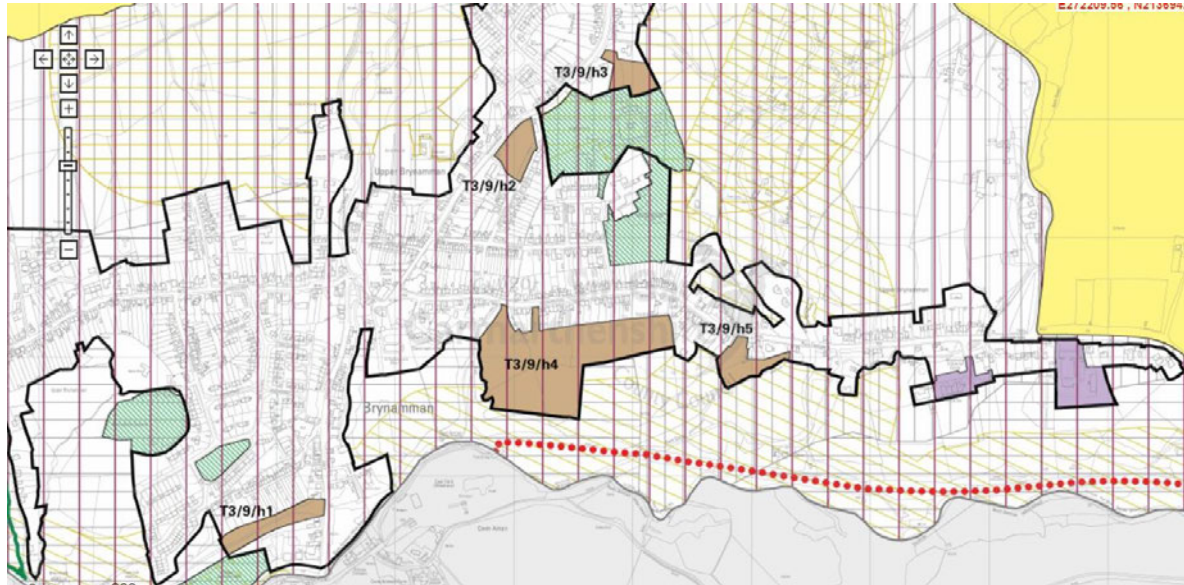
2.2.4 In terms of the Penywaun Site, it is located within easy driving and walking distance of all community facilities and local services present provided within the Upper and Lower Brynamman settlements. Access to further facilities in the town of Pontardawe to the south and Ammanford to the west can be gained by regular bus services where stops are located near the site frontage upon the A4068 road.

2.2.5 **Transition from Adopted Local Development Plan (2006-21) – Allocation Status**

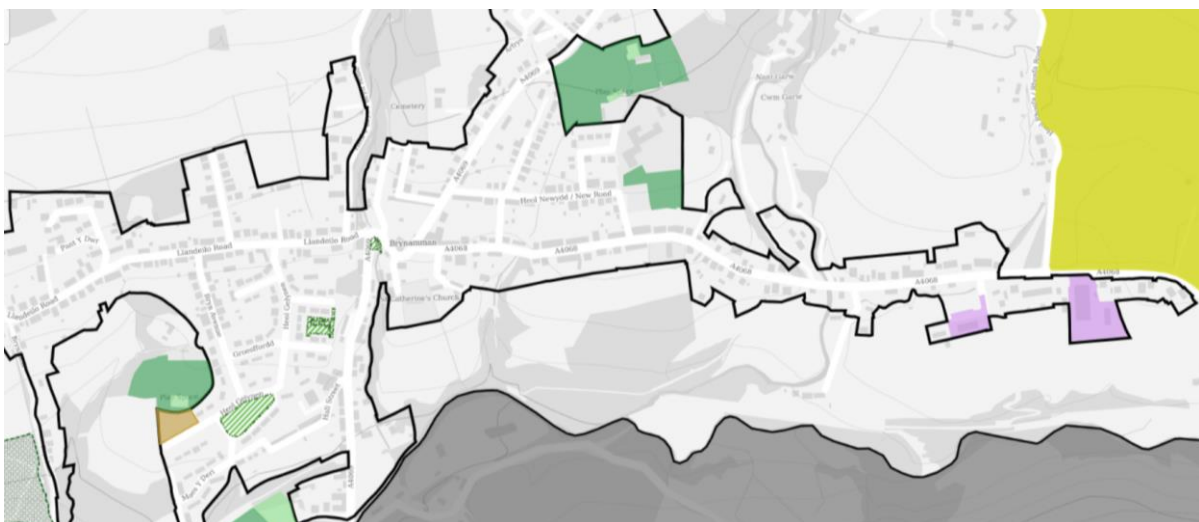
In terms of planned growth, the proposed Alternative Site is located within the identified **T3/9 Brynamman Local Service Centre** within the current LDP, adopted in December 2014. Brynamman is regarded by the Council as sustainable settlement. Within these areas, a Local Service Centre is regarded as accommodating a range of services providing a modest degree of sustainability to the local community.

2.2.6 A number of the housing allocations were presented within the LDP but have yet to be delivered after 8 years since the Plan's adoption. Plan D below provides an extract from the 2014 Proposals Map for Brynamman.

In considering the formulation of a new Plan, the Council have appeared to drastically reduced the number of residential allocations in the Local Service Centre, from a total of five in the adopted plan as shown below to only **ONE** in the new Replacement LDP. Plan E illustrates the remarkable contrast.



Plan D – adopted 2014 LDP Extract for Brynamman illustrating five residential allocations



Plan E – Second Draft Plan for Brynamman with only one residential allocation

2.2.7 The net result is that despite the Local Service Centre continuing to have good provision of community facilities, local services and public transport connections to Ystradgynlais and Ammanford, its ability to grow and capitalised on these sustainable attributes has been prevented through a lack of delivery of existing allocations. More deliverable residential opportunities are required. The deliverability of the remainder

of the longstanding allocations are clearly in doubt, so, in order to re-address this deficit in provision and capitalise on the sustainability of the Sustainable Community, more deliverable residential allocations are required.

2.2.8 **Second Deposit Draft LDP (February 2023)**

The Council published a Deposit Draft in February 2023, which is now subject of public consultation. Within the Second Deposit Draft, only one site is allocated for housing provision within Brynamman, and this was also included within the settlement limits in the 2014 adopted Plan.

Brynamman		
SeC9/h2	Heol Gelynen	8

Table 1 – 2023 Second Deposit Draft Allocation

2.2.9 It is noted that Heol Gelynen is only allocated for 8 units, which is a remarkable reduction in housing supply availability from the 2014 plan where the five allocated sites added up to a village total of 107 units. New Second Draft settlement limits have been re-drawn to exclude large allocations, whilst any smaller sites have remained in settlement limits but been de-allocated. The Council's claim in their Assessment Table of January 2023 that "*sufficient residential opportunities exist within the settlement*" is **completely incorrect** in that all 107 units allocated in the 2014 adopted Plan have been omitted and only one small site as referred to above has been added. In short, **there are no worthwhile residential opportunities** in Brynamman identified in the new Second Draft of the LDP.

2.3 Settlement Facilities

- 2.3.1 The Alternative Site lies upon the A4068 Ystradgynlais to Ammanford main highway. Public bus stops are located only two minutes' walk from the Alternative Site at Cwmgarw Road. Main public bus services call at these stops, particularly the 64 service (Ystradgynlais to Ammanford) which calls at Cwmgarw Road.
- 2.3.2 It lies less than a one-minute walk from the former Remploy Industrial Estate. A selection of small convenience shops, public houses and community facilities are located near the Black Mountain Centre, set upon the junction of Cwmgarw Road with Mountain Road, some 10-15 minutes' walk west from the site. Brynamman Primary School is a two-minute drive away at New Road.
- 2.3.3 Pontardawe and Ystradgynlais town centres are located a short 15 minutes' drive away with its associated comparison shops, high street banks, public houses/cafes, offices, industrial estate, library, and leisure/recreation facilities. Ammanford town centre is slightly further by road or bus at about 20 minutes' drive time, but from where the Heart of Wales Rail Line can be accessed.

3.0 THE PROPOSAL

3.0.1 This Statement is accompanied by an indicative layout for a potential residential scheme that could be development on the site. It should be emphasised that the accompanying layout is for illustrative purposes only, and that other design solutions for the site could be reached. Notwithstanding this, the accompanying layout drawing has taken into account all potential assets and constraints of the site and demonstrates that it can deliver **11 units** in a deliverable and sustainable manner.

3.1 DEVELOPMENT OVERVIEW

3.1.1 It is proposed that the Alternative Site be allocated in the forthcoming replacement LDP for the purposes of a combined total of 11 residential units. As detailed above, the accompanying illustrative layout demonstrates that the site can accommodate this number in a deliverable and sustainable manner. Plan E illustrates the indicative site layout for the Alternative Site, as edged in red, extending off the A4068 highway.



Plan E – Site Layout

- 3.1.2 As illustrated above, the site is capable of accommodating detached and semi-detached houses to replicate and being reflective to the existing form of the development to the west along Cwmgarw Road.
- 3.1.3 With regards to access, it is proposed that the Alternative Site would be served by an improvements and widening of the existing access track adjoining the A4068 highway. Vehicle speeds are consistent with the 40mph speed limit, and thus visibility splays of 2.4m x 59m can easily be achieved where the accesses adjoin the A4068 road.
- 3.1.4 The Alternative Site proposals can fully retain all existing boundary treatments being established tree perimeter and hedgerows about the existing house at Penywaun Farm and shared boundaries with No's 181 and 185 to the east and south-east.

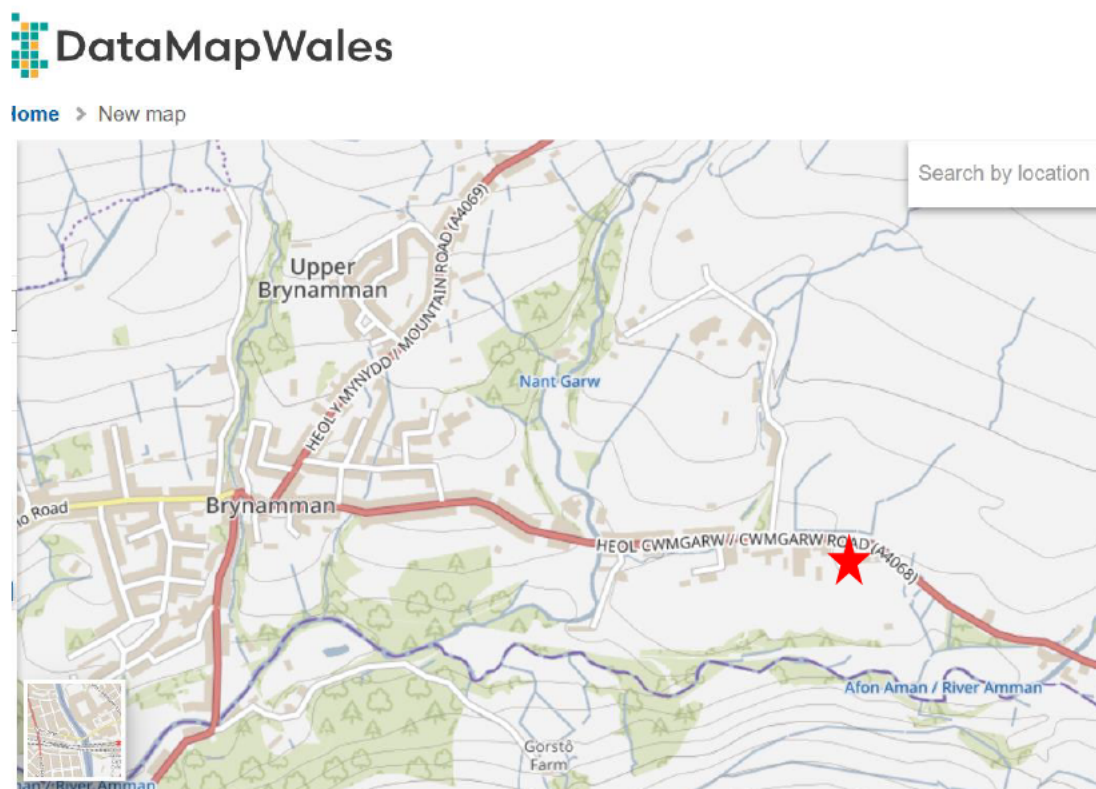
3.2 INFRASTRUCTURE CONSIDERATIONS

- 3.2.1 Development of the Alternative Site for residential units would be served by mains water, public sewer and electricity connections.
- 3.2.2 A new estate road is proposed within the development. This will be equipped with roadside gullies and drainage which aid discharge run-off from the carriageway. The proposed accesses to the site could connect to the existing highways drainage.
- 3.2.3 The Alternative Site comprises of agricultural pasture. There are no areas of significant marshy grassland or water-logging evident, and therefore at first inspection, it appears that the site benefits from good ground percolation of rainwater.
- 3.2.4 Soakaways would be the most sustainable means of disposing of surface water from individual properties. If required, attenuation measures can be deployed on site to control surface water run-off during extreme storm events, which could also allow for additional capacity, making allowances for climate change. Such features can be soft engineered in the form of attenuations basins and / or swales, thus adhering to the principle of Sustainable Urban Drainage Systems (SUDS).

4.0 ENVIRONMENTAL CONSIDERATIONS

4.1 ECOLOGICAL ATTRIBUTES

4.1.1 The Alternative Site has been assessed against data held on the “Data Map Wales” website which details statutory and non-statutory National and Local sites of ecological importance. Plan F below provides an extract of those records applied to the Brynamman locality. The red star denotes the position of the Alternative Site.



Plan F – Extract from Data Map Wales detailing any known ecological interests

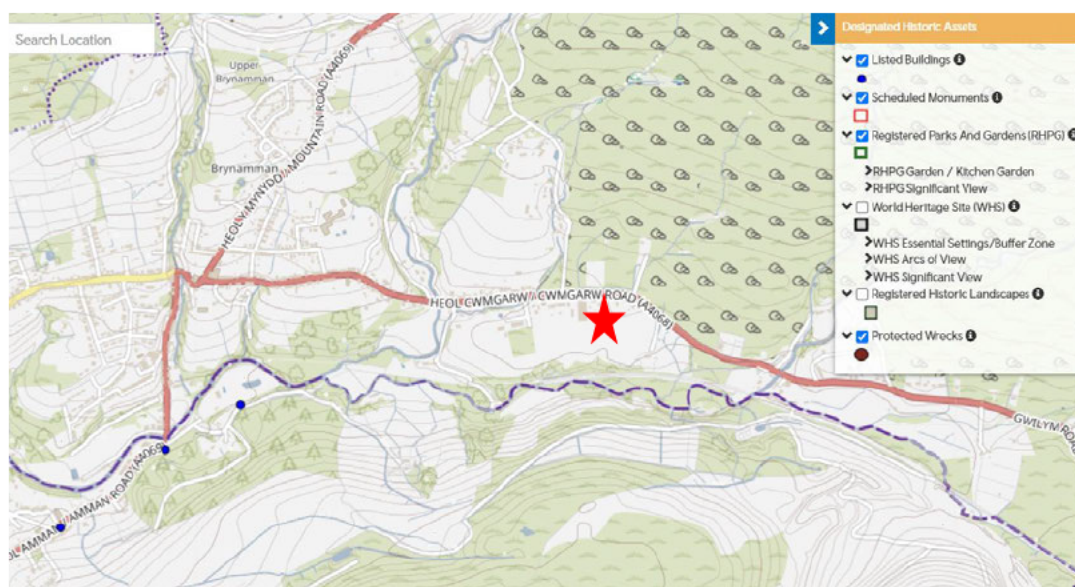
4.1.2 The records reveal that the Alternative Site does not include or adjoin any national or local nature conservation designation. Any biodiversity assets that may be present or adjoining the Penywaun Site have been given full consideration with regards to exploring its potential for residential development. This has included the proposed retention and management of existing boundary trees. It is envisaged that the entirety

of mature tree lines could be retained and managed further for uninterrupted biodiversity gain.

4.1.3 It is considered that any statutory and non-statutory designations are significantly distant from the site, which will ensure that its development would have no detrimental impact upon them.

4.2 HISTORICAL ASSETS

4.2.1 The Alternative Site has been assessed for any proximity to known and designated Historic Assets, using the “Cof Cymru – National Historic Assets of Wales” from CADW’s website. An extract from Cof Cymru Assets map for Brynamman is reproduced below as Plan G. The red star denotes the position of the Penywaun Site.



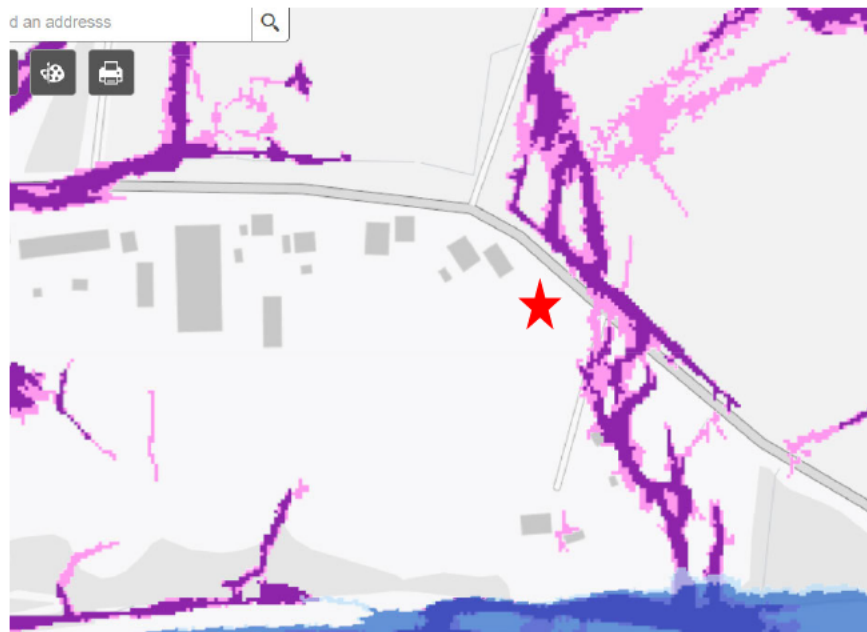
Plan G – Extract from Cof Cymru Historic Assets website

4.2.2 The extract reveals there to be no Listed Buildings nor Scheduled Ancient Monuments in the locality.

ENVIRONMENTAL CONSTRAINTS

Potential for Risk from Flooding

- 4.3.1 The Alternative Site has been assessed against the Flood Map for Planning, prepared by Natural Resources Wales, and as referred to within the Welsh Government's revised / draft "Technical Advice Note 15: Development and Flood Risk". An extract from the Flood Map for Planning is reproduced below as Plan H, with the site denoted by a red star.

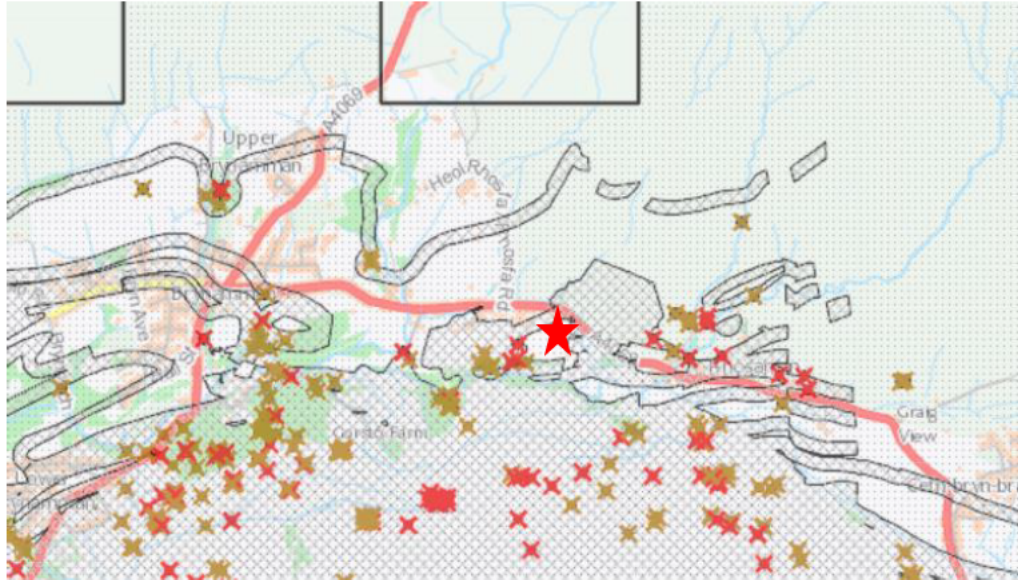


Plan H – Extract from NRW's Flood Map for Planning

- 4.3.2 The above plan extract reveals that no part of the Alternative Site lies within the designated flood zone of the River Amman, and thus the potential development of the site is not at risk from fluvial flooding.
- 4.3.3 An examination has also been made of NRW records relating to potential surface water flooding, as shown by purple tone in the above plan. The red star again denotes the positioning of the Alternative Site and reveals there to be no potential for pooling of surface water upon the site.

Past and Present Potential for Ground Contamination and Coal Mining Activity

4.3.4 The Candidate Site comprises a modest former agricultural field. Due to its greenfield nature and agricultural use, the field has no history of known past ground contamination related constraints.



Plan I – Coal Authority Map indicating former mining legacy

4.3.5 The records of The Coal Authority have been examined and reveal the history of coal mining in this part of the County. Whilst there are underlying seams of coal under Cwmgarw Road, there are no mine entries near the site, as indicated above at Plan I by a red star.

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 aspects inherently poses risks that the Plan may be unsound and so in turn fails 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

5.1 VIABILITY APPRAISAL

5.1.1 The following provides an indication of the viability of delivering the proposed 11 units on the Alternative Site in question. It is based very much on its greenfield status and uses values 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 land value for the scheme.

Costs

- Dwelling construction costs are based on an absolute minimum of £1300 per metre given that bespoke four bed detached houses (140 sq.m.) and three-bed semi-detached houses (90 sq.m.), with a medium grade of internal finishing.
- Estate road carriageway costs are placed at £1200 per linear metre
- Connections for all utilities include water, foul water and electric.
- Developer's Profit based on minimum RICS guidelines (18%)
- Professional Fees include planning application fee, associated professional fees, estate agency fees (1%) and LABC Warranty fee.

Sales Values

- Sale Prices based on LPAs “Affordable Housing” Supplementary Planning Guidance, market research and Welsh Government “Acceptable Cost Guidance” figures where relevant.

5.1.2 Using the above, the following represents a strategic viability appraisal for the proposed 11 units, based on an affordable housing level being a 10% contribution of the total number of dwellinghouses proposed.

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
Four Bed Houses	182,000	7	832,000
Three Bed Semi-detached	117,000	4	468,000
Road Construction	1200	120	144,000
Utility Connections	5000	11	55,000
Professional Fees	-	-	90,000
Sprinklers	3500	11	38,000
Parks and Education	5000	11	55,000
Contribution			
Total			1,682,000
Sales			
Four Bed (Open M'kt)	250,000	7	1,750,000
Three Bed (Op M'kt)	190,000	3	570,000
Three Bed (Affordable)	91,000	1	91,000
Total Sales			2,411,000
Developers Profit		Total	434,000
Residual Land Value			295,000

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. The residual land value of £295,000 for a site consisting of 11 dwellings over a 1.3-acre sized site is consistent with evidence gathered over recent years by the District Valuer in examining residential site transactions within Carmarthenshire. The DV discovered land values on completed

and on-going sites to be averaging £245,000 per net residential acre of land, based on 2020 values.

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, with a developer secured, it is envisaged that the site could be capable of being completed within 2 years from the adoption of the Replacement Local Development Plan. Cwmgarw Road remains an attractive part of Brynamman given its panoramic views over the Black Mountain and National Park. Road, benefitting from its semi-rural location, but easy access to Ystradgynlais and Ammanford by road and the nearby schools, shops, services and community facilities.

6.0 NATIONAL PLANNING POLICY CONSIDERATIONS

6.1 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* and a series of *Technical Advice Notes* (TAN) that deal with a variety of topic areas.

6.2 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.”*

6.3 At present, Carmarthenshire County Council’s housing supply figure is below the required 5-year level therefore, 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.

6.4 Dealing specifically with the Alternative Site subject of this Report, it is evident that its inclusion within the Replacement LDP would adhere to the requirements of PPW, in that it is free from any planning, physical, or ownership constraint. In addition, as shown in Section 5 of this statement, the site is also economically viable in deliverability terms.

7.0 CONCLUSION

- 7.1 The Alternative Site is modest in overall size, with established dwellinghouses located off either side flanks at Cwmgarw Road. The enclosure tends to be well screened from public view by virtue of high perimeter trees which shelter the site, and add a sense of semi-rural character to the scheme.
- 7.2 The Site lies within close proximity and walking distance to the existing community and local services of Brynamman which will ensure it makes a positive contribution to both national and local sustainable development objectives.
- 7.3 From a wider sense, the Site will also benefit from well served excellent public transport links to the nearby settlements, specifically the town of Ystradgynlais and Ammanford, together with other locations within and adjoining the County. In tandem to this, the development of the Site will in turn ensure a deliverable source of future housing for the Sustainable Community in which it lies, which has seen both allocated sites fully developed leading to an under supply 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 recognises the suitability and deliverability of modest sites if it is to continue to realise the contribution villages such as Brynamman make to the housing land supply.
- 7.4 With the Alternative Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership constraints, its delivery if included within settlement limits is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable alternative for future housing development.
- 7.5 In view of the above and the information provided within this Statement, it is respectfully requested that the Alternative Site in question be included within limits for a modest residential development.