



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

**LAND OFF LLANNON ROAD, UPPER TUMBLE**

on behalf of  
Mr A Hughes

Our Ref: 1610.a  
Date: April 2023  
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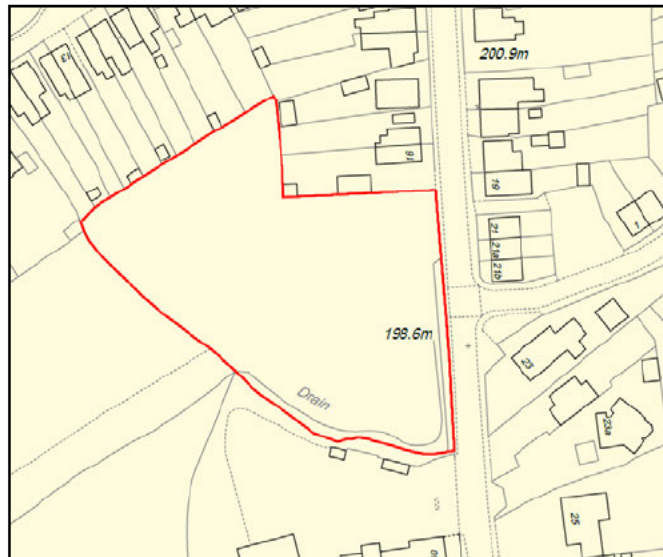
## 1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. has been instructed by Mr A Hughes to prepare and submit an Alternative Allocation Report for the allocation of land off Llannon Road, Upper Tumble for the purposes of residential development in the forthcoming replacement *Carmarthenshire Local Development Plan (LDP)*.
- 1.2 This report 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 and indicative drawing package, as well as a sustainability assessment undertaken in-line with the Authority's requirements.

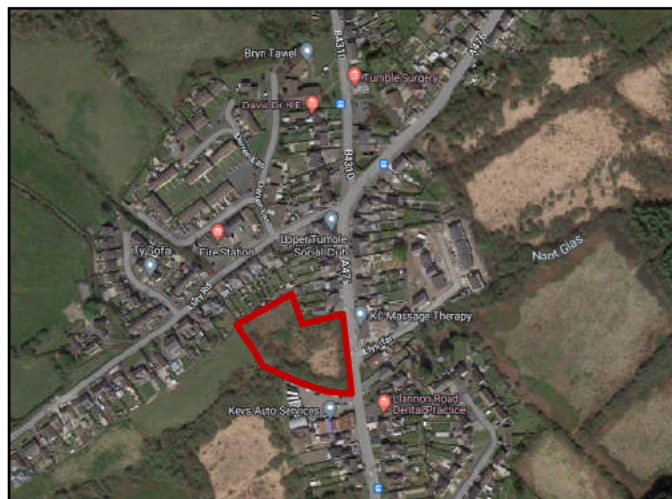
## 2.0 SITE CONTEXT

### 2.1 THE SITE AND CURRENT CONTEXT

2.1.1 The Alternative Site relates to two parcels of land measuring approximately 1.4 acres 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 Photograph 1, the Site currently consists of two parcels of poor quality agricultural land, with all their boundaries well defined by a mix of mature hedgerows and stock proof fencing (east and west), together with domestic and commercial fencing (north and south).

2.1.3 Access to the Site is currently gained via an adjoining agricultural enclosure to its west. However, any development of the Site would gain access directly off Llannon Road, which has excellent levels of visibility as illustrated below.



**Photograph 2**



**Photograph 3**

2.1.4 Under the provisions of the current Carmarthenshire LDP, the Site presently lies outside of the defined Development Limits of the settlement of Upper Tumble. However, as the extract of the Proposals Map below illustrates, the Site (outlined in red) not only adjoins the current built form of the urban area, but is in fact almost entirely encapsulated by it.



**Plan B**

2.1.5 As can be seen, the Alternative Site is therefore well related to the existing defined Development Limits for Upper Tumble and the settlement's built form as a whole when existing development is taken into consideration. Its position and proposed use therefore represents a natural and logical location for the settlement's expansion.

## **2.2 THE ADJOINING SETTLEMENT**

2.2.1 As detailed above, the Alternative Site adjoins the existing built form of the settlement of Upper Tumble. Upper Tumble is a nucleated settlement in form, with its core positioned just to the north of the Alternative Site. From this then it has evolved and grown along the three roads of Llety Road, Llannon Road (A476) and the B4310, in a both linear and in-depth fashion.

2.2.2 In terms of community facilities and local services, the settlement of Upper Tumble and adjoining Tumble contains a wide range, including dental and doctor surgeries, primary school, a range of retail units, public houses, takeaway establishments, community halls and places of worship. The settlement is also well served by a number of bus services – Nos. 128 and 166 (two bus stops for which are within 200m of the Site) - providing regular access to the larger settlements of Cross Hands, Llanelli and Carmarthen. The strong sustainable position of the Alternative Site should therefore be given full consideration when considering potential future growth options.

2.2.3 In terms of planned growth for Upper Tumble, the 2<sup>nd</sup> Deposit LDP classifies the settlement as forming part of the greater Cross Hands urban area and so categorises it as a Principal Centre under its proposed Settlement Framework. Within these areas, the majority of the County's growth (particularly with regards to housing) is expected to be accommodated within the Plan period. However, having undertaken a comprehensive review of the proposed allocations put forward by the 2<sup>nd</sup> 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**

2.2.4 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, 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, as well as current Authority design guidance, and demonstrates that it is capable of delivering 20 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 20 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 D



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- 3.1.2 As illustrated above, the site is potentially capable of accommodating a mix of unit sizes and types, with the associated density – 20 units – having therefore taken into consideration this potential mix. The form of development for the Alternative Site is also capable of following the current development pattern established by similar developments along Llannon Road, such as Troed y Bryn, Llys Ifan and Banc y Gors, therefore maximising the use of 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 directly off Llannon Road. As can be seen in the Photographs at Section 2, the required level of visibility is achievable in both directions.
- 3.1.4 The Alternative Site proposal can retain and enhance existing boundary treatments, as well as accommodating further biodiversity enhancements within a detailed scheme for the Site.

## **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 E below provides an extract of those records applied to the Upper Tumble locality, with the red star denoting the position of the Alternative Site.

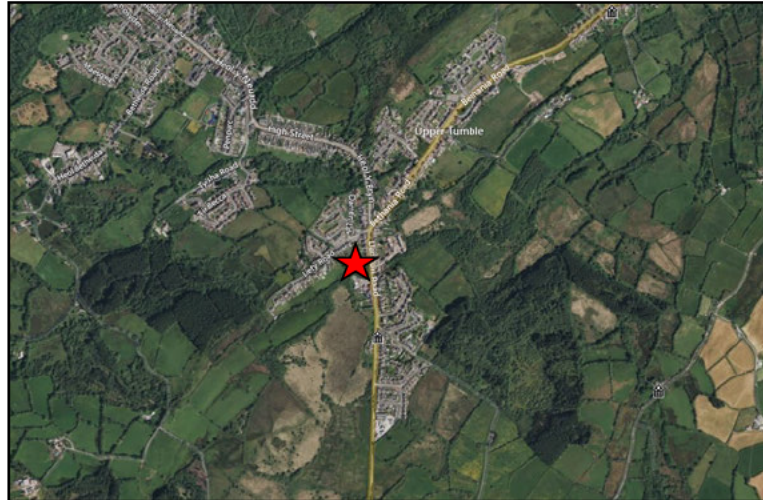


Plan E

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.

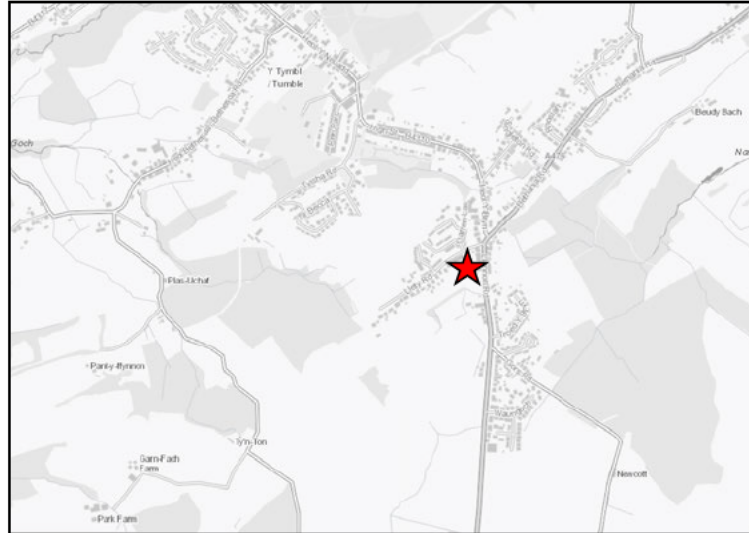


Plan F

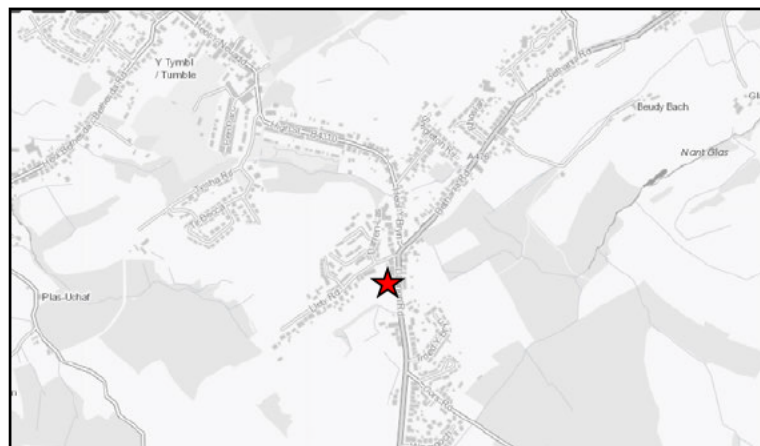
4.2.2 As can be seen, neither the Alternative Site nor immediately adjoining element of the settlement includes any Scheduled Ancient Monuments, Listed Buildings or Conservation Area's. As a result, the development of the Site would not have any detrimental impact on the setting or interest of any nearby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

## 4.3 ENVIRONMENTAL CONSTRAINTS

4.3.1 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 plans below (Alternative Site indicated by the red star).



**Plan G**  
**(Development Advice Maps)**



**Plan H**  
**(Flood Maps for Planning)**

4.3.2 Due to its greenfield nature, the Candidate Site has no ground contamination related constraints.

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## 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 £1,150 per metre
- 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 20 units, with 3 units being made available on an affordable basis (based on 3 three bed units).

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
3 Bed Det. (110 sqm)	126500	2	253000
3 Bed Semi (90 sqm)	103500	12	1242000
2 Bed Link (70 sq m)	80500	6	483000
Utility Connections	5000	20	100000
Road and Access	1200	150	180000
Professional Fees	-		92632
Sprinklers	3500	20	70000
Parks and Education Cont.	5000	20	100000
<b>Total</b>			<b>2520632</b>
<b>Sales</b>			
3 Bed Semi (130 sqm) (Aff)	77762	3	233286
3 Bed Det. (160 sqm)	260000	2	520000
3 Bed Semi (130 sqm)	210000	9	1890000
2 Bed Link (90 sq m)	150000	6	900000
<b>Total</b>			<b>3543286</b>
Developers Profit		<b>Total</b>	<b>637791.48</b>
<b>Residual Land Value</b>			<b>384862.52</b>

**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 2-3 years from the adoption of the Replacement Local Development Plan.

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## 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 2<sup>nd</sup> 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.



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## 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. As has been demonstrated by this report, the Site in fact represents a logical infill site within the existing urban form of Upper Tumble.
- 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. This will then 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 adjoining larger conurbation of Cross Hands and indeed Llanelli 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.
- 7.4 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.
- 7.5 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.

- 7.6 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.