



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

LAND PART OF SARNAU,
GLANDY CROSS, CARMARTHENSHIRE

On behalf of Mr & Mrs S. Davies

Our Ref: 1599.a
Date: March 2023
Prepared by: Richard Banks

1.0 INTRODUCTION

1.1 Mr & Mrs S. 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 Sarnau, Glandy Cross, 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.

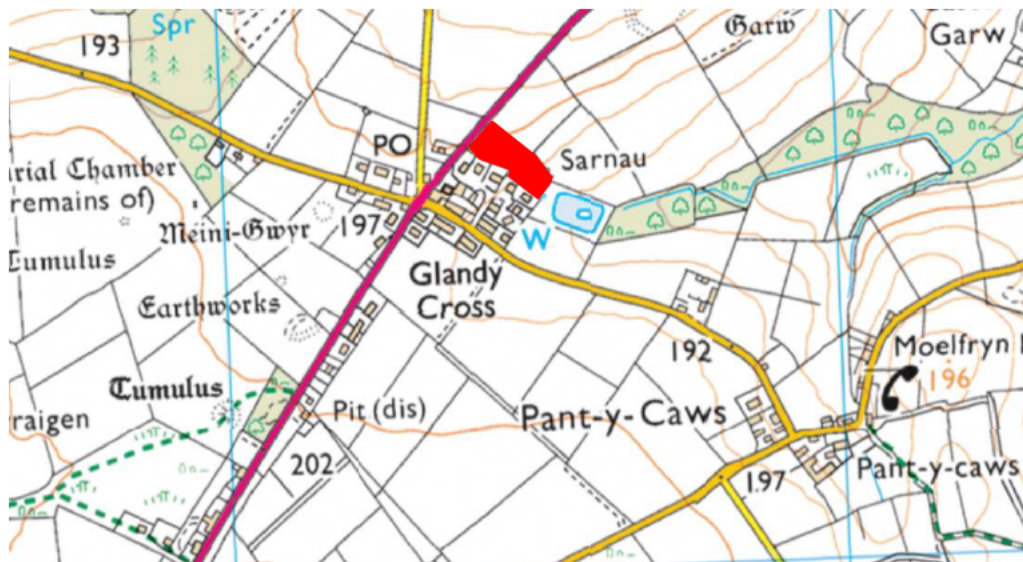
1.3 The contents of this Statement therefore provide a comprehensive case for the inclusion of the land for residential development purposes within the defined settlement limits of Glandy Cross, and it should also be read in conjunction with the accompanying supporting information and indicative site layout plan.

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 northern flank of a farm access track, off the A478 Road within the village of Glandy Cross. The entire field parcel is rectangular in shape and extends to a gross area of 3.4 acres (1.78 hectares). It has a continuous boundary around its perimeter consisting of hedgerows and mature trees, with the western perimeter flanking the A478 road.
- 2.1.2 The Alternative Site is modest, being only **approximately 0.36 hectares (0.88 acres)** in overall size, and has a frontage to the surfaced access lane, extending for a length of 90 metres to a two-storey established property known as Sarnau. That dwelling benefits from a domesticated garden to its western, front curtilage and also an irregular shaped enclosure off the southern, opposite side of the access track. Grazing fields extend to the north and east, with a large pond to be found to the immediate east of the property. The southern perimeter of the access track and Sarnau property lies off the rear gardens of bungalow properties set about a cul-de-sac known as "Bro Deirian." Some 10 individual properties encircle a hammerhead road layout, with traditional rear garden space backing onto the Alternative Site.
- 2.1.3 The western flank of the A478 Road comprises of more established, older residential properties set fronting that highway, and with a modest field enclosure set allocated for further residential development within a triangular-shaped enclosure to its immediate north, which will have the effect of extending the village northwards. The Alternative Site should therefore be considered as a logical addition to Glandy Cross settlement, being directly opposite that allocated field, and which will mirrors that proposed development, but located to the east of the A478 extending north to an equivalent distance.

2.1.4 The parcel of land is identified in red by Plan A, which illustrates its wider position within the settlement of Glandy Cross and shows the existing consolidated form of modest estate and frontage development to the A478 Road. Plan B provides a detailed Ordnance Survey map extract with the site perimeters identified.



Plan A – wider setting of Glandy Cross 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 its long frontage to the A road is equipped with an agricultural field access set just to the north of a wide public bus top with its associated lay-by. A wide grassed verge lies off the back edge of pavement, with a linear hedgerow to the site frontage. The Site itself is relatively level, without any discernible differences in ground or contour levels.



Photo 1 – view of level field from adjacent A478 highway



Photo 2 – view of wide access track from A478 road



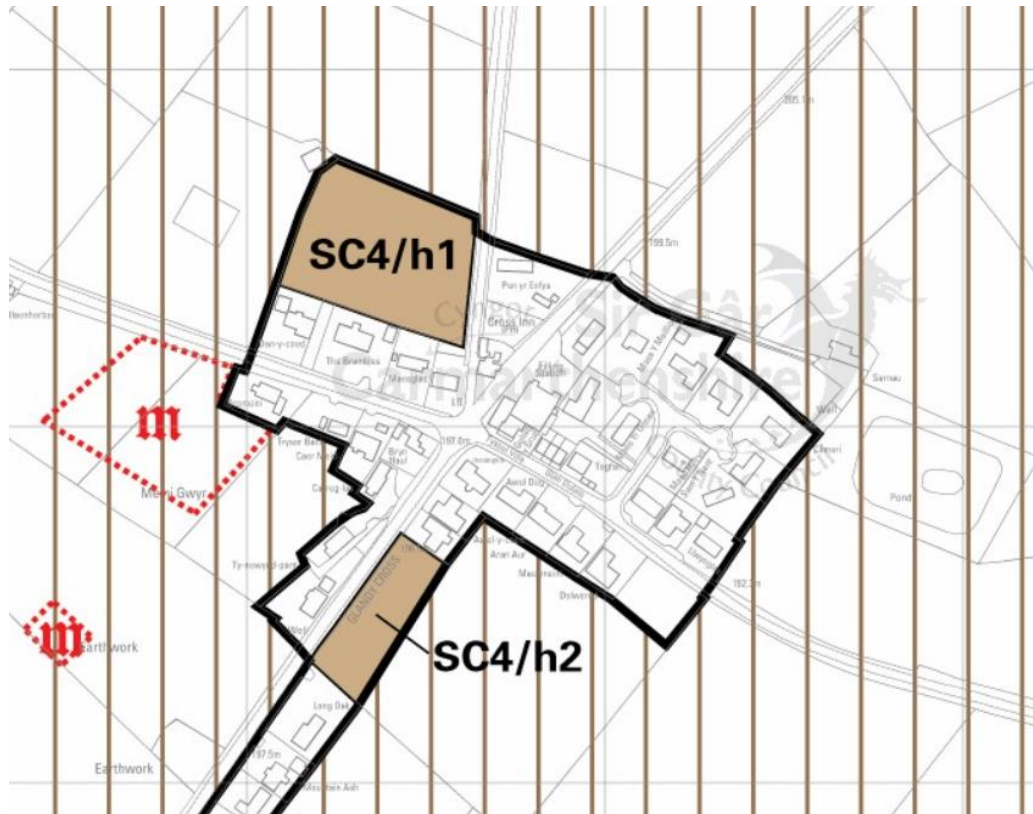
Photo 3 – view to left (south) from existing access onto A478 road illustrating excellent visibility



Photo 4 – view to right (north) from existing access onto A478 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 Glandy Cross. The site is shown edged in red at Plan C below, with the Second Deposit Draft Plan extract shown as Plan D.



Plan C – 2014 Adopted LDP plan for Glandy Cross



Plan D – Second Deposit Draft of Glandy Cross

2.2.2 The Alternative Site adjoins and is well related to the existing defined Development Limits of Glandy Cross. At present the development limits are drawn tightly about the existing settlement form at Bro Deirian. The Alternative Site seeks to mirror the development proposed on the opposite side of the A478.

2.2.3 The Alternative Site's position and proposed use represents a natural and logical location for the settlement's expansion ensuring that development is produced evenly throughout. **Indeed, the property known as Sarnau together with the southern triangular-shaped enclosure were included within the settlement limits of the Carmarthenshire Unitary Development Plan. Outline planning permission was granted in 2006 for a new dwellinghouse within this southern enclosure.**

2.2.4 Glandy Cross is a popular location particularly to new homeowners due to its accessibility to the nearby settlements of Clunderwen, Llandissilio and town of Narberth and Crymych, and its links via the A478 Penblewin to Cardigan Road.

2.2.5 In terms of the Sarnau Site, it is located within easy driving distance of all community facilities and local services present provided within Glandy Cross and Efailwen settlements. Access to further facilities in the town of Narberth to the south and Crymych to the north can be gained by regular bus services where stops are located near the village crossroads upon the A478 road.

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

In terms of planned growth, the proposed Alternative Site is located within the identified **SC4 Settlement Cluster** within the current LDP, adopted in December 2014. Glandy Cross and Efailwen are regarded by the Council as sustainable settlement communities several kilometres north of Clunderwen and Narberth within Pembrokeshire. Within these areas, those settlements are regarded as accommodating a range of services providing a modest degree of sustainability to the local community.

2.2.7 A number of the housing allocations within the LDP have yet to be delivered after 8 years since the Plan's adoption. Glandy Cross appears to now been assessed as a separate settlement from Efailwen for the purposes of developing the Second Draft of the Replacement LDP. The new Inset Map identifies two residential allocations.

Plan C above provided an extract from the 2014 Proposals Map for Glandy Cross. It indicates two residential allocation sites in Glandy Cross, being SC4/h1 at "Maesglas" and SC4/h2 at "Cross Roads". The Council have chosen to retain those sites within the Replacement LDP. Maesglas is now allocated as SuV55/h1 for a total of 9 units, whilst "Cross Roads" is no longer allocated but continues to lie **INSIDE** new draft settlement limits. Plan D below provides an extract of the 2014 adopted LDP extract for Glandy Cross.

In considering, the formulation of a new Plan, the Council have examined four Candidate Sites put forward in August 2018. In 2023, the Council provides an Assessment Report evaluating those Candidate Sites, and in the case of Maesglas indicates that it should continue as an allocation based upon "*Outline Application pending on this site. Site to remain as an allocation with reference SUV55/h1.*" That

application is referenced W/38320 which was granted in May 2021. However, only outline planning permission was granted, and in the subsequent two years, no submissions for Approval of Reserved Matters have been made. It therefore remains questionable as to whether the development of that site will be brought forward.

In terms of SC4/h2 at Cross Roads, the Council's online application records reveal that no applications for planning permission have been submitted in the 8 years since adoption, and therefore it must be questioned why the land remains within settlement limits?

2.2.8 The net result is that despite the Settlement Community continuing to have good provision of community facilities, local services and public transport connections to Crymych and Narberth, 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.

2.2.9 **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, the following sites are allocated for housing provision within Glandy Cross.

Glandy Cross				
SuV55/h1	Land to the r/o Maesglas	9	Commuted Sum Contribution	Year 6 - 10
SuV55/h2	Land to the north of Cross Inn PH	6	Commuted Sum Contribution	Year 6 - 10 Year 11 - 15

Table 1 – 2023 Second Deposit Draft Allocations

2.2.10 It is noted that the level of allocation in Glandy Cross has remained consistent. The Maesglas site is evident, as is a new allocation at “land north of Cross PH.” That site is allocated as SuV55/h2 for 6 units. It is noteworthy given its position lying directly opposite Sarnau off the opposite, western flank of the A478 road.

We consider that it is clear that there is a need for an additional minor site within the proposed Replacement LDP. Sarnau is located across the main road from SuV55/h2 and possesses the same physical and locational characteristics as that site. In the case of Sarnau it benefits from being located off an established vehicular access lane off the A478 road and has an established residential dwelling located within the Alternative Site.

2.3 Settlement Facilities

2.3.1 The Alternative Site lies upon the A478 Penblewin to Cardigan main highway, only some 5 miles south of Crymych. Public bus stops are located immediately adjoining the Glandy Cross crossroads, only two minutes’ walk from the Alternative Site. Main public bus services call at these stops, particularly the 430 service (Cardigan to Narberth) which calls at Crymych to the north and Clunderwen and Llandissilo to the south.

2.3.2 The Sarnau Site is a short 5 minutes’ drive from Clunderwen railway station which has services to Cardiff and Swansea to the east and Haverfordwest and Milford Haven to the east.

2.3.3 It lies within a one-minute walk from the Glandy Cross petrol filling station and general store whilst Ysgol Beca Primary School is a two-minute drive away at Efailwen.

2.3.4 Narberth town centre is 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.

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 **4 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 4 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 A478 highway, proposing a mirrored and balanced development to that to the west of the highway and Bro Deirian to the immediate south.



Plan E – Site Layout

- 3.1.2 As illustrated above, the site is capable of accommodating detached bungalows to replicate and being reflective to the existing form of the development to the south at Bro Deirian.
- 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 A478 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 A478 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.

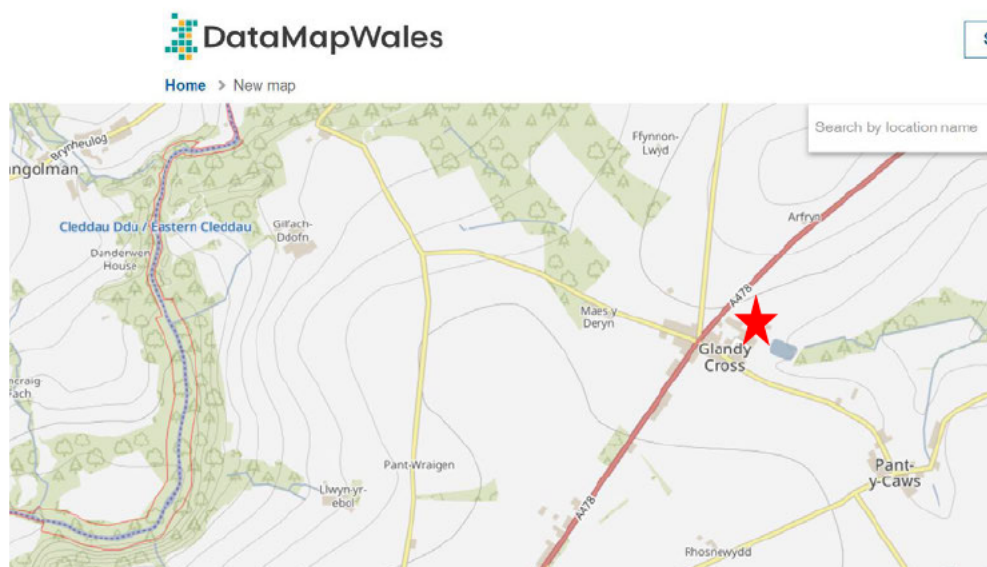
3.2 INFRASTRUCTURE CONSIDERATIONS

- 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 former agricultural pasture and domestic curtilage. 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 Glandy Cross locality. The red star denotes the position of the Alternative Site.



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

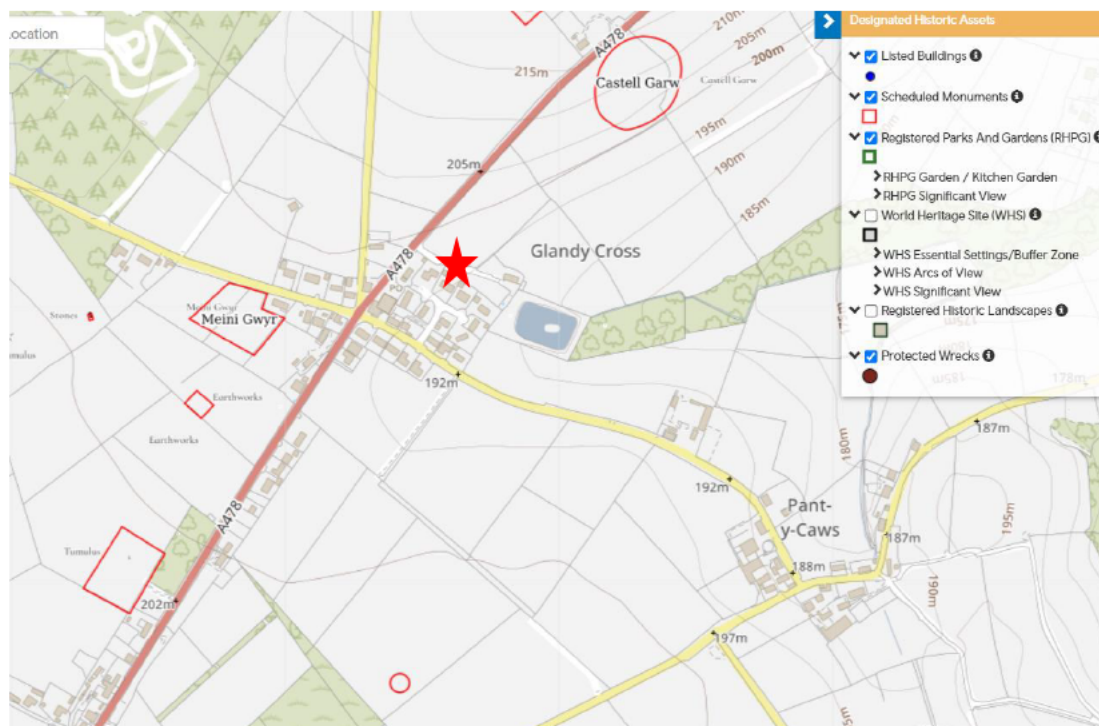
4.1.2 The records reveal that the Alternative Site does not include or adjoin any national or local nature conservation designation. The Eastern Cleddau SSSI lies several kilometres west of the village.

Any biodiversity assets that may be present or adjoining the Sarnau 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 Glandy Cross is reproduced below as Plan G. The red star denotes the position of the Sarnau Site.



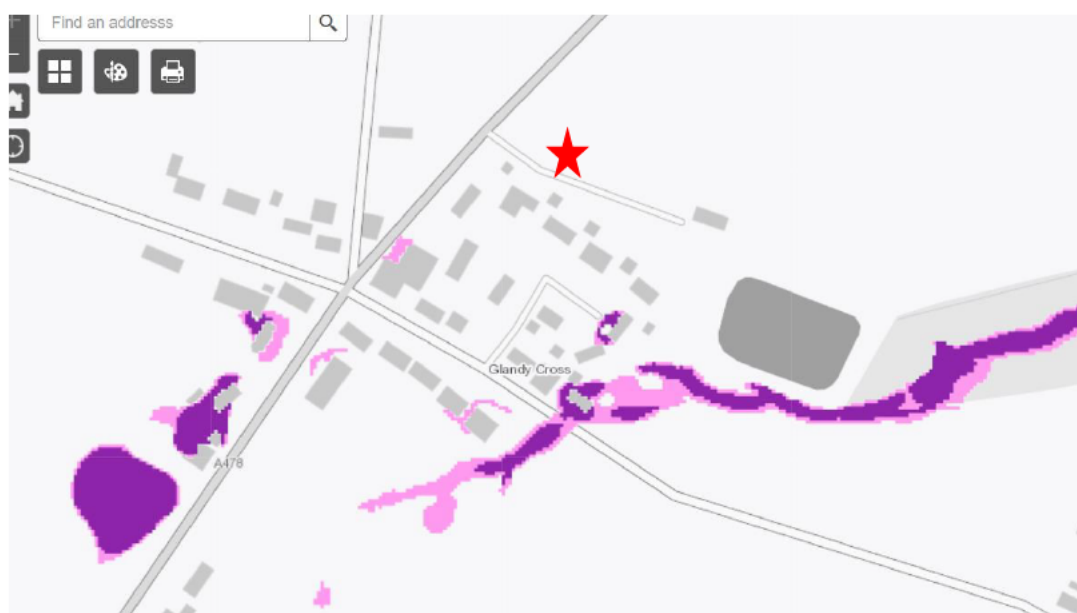
Plan G – Extract from Cof Cymru Historic Assets website

4.2.2 The extract reveals a multitude of Scheduled Ancient Monuments in the locality; however, none are to be found within the Alternative Site field enclosure and are located south-west and north-east of the village.

4.3 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 zones, and thus the potential development of the site is not at risk from either fluvial or tidal 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.
- 4.3.5 The records of The Coal Authority have been examined and reveal no history of coal mining in this part of the County.

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 4 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 bungalows (160 sq.m.), with a

medium grade of internal finishing, and formation of accesses to the highway are likely to be the preferred house type.

- 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 4 units, based on an affordable housing level being a financial contribution of £75.00 per square metre of internal floorspace.

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
Four Bed Bungalows	208,000	4	832,000
Road Construction	1200	100	120,000
Utility Connections	5000	4	20,000
Professional Fees	-	-	40,000
Sprinklers	3500	4	14,000
Affordable Housing Contribution	75	640	48,000
Total			1,074,000
Sales			
Four Bed (Open M'kt)	400,000	4	1,600,000
Developers Profit	Total		288,000
Residual Land Value			238,000

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 £238,000 for a site

consisting of four development plots (£59,000 per plot) 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. Glandy Cross remains an attractive part of the cluster of villages about the Cardigan to Penblewin Road, benefitting from its semi-rural location, but easy access to Crymych and Narberth by road and the nearby schools, shops, services and community facilities.
- 5.2.3 The presence of modern, detached houses and bungalows adjoining and located immediately alongside at Bro Deirian is testament to this market need and the desire for home buyers to seek out such forms of modest residential development.

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 principal 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 an established dwellinghouse located within a modest side curtilage and southern enclosure, backing onto Bro Deirian. That property and southern enclosure was set within the **2006 Unitary Development Plan and benefitted from outline planning permission to site a new dwellinghouse in this enclosure. At that time, the Council saw no reason to consider this site as one not otherwise conforming to the spatial and consolidated form of the village.**
- 7.2 The Site lies within close proximity and walking distance to the existing community and local services of Glandy Cross and Efailwen 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 Crymych and Narberth, 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 Glandy Cross 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.