



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

LAND OFF CWMAMMAN ROAD, GLANAMAN

on behalf of
Card Property Development

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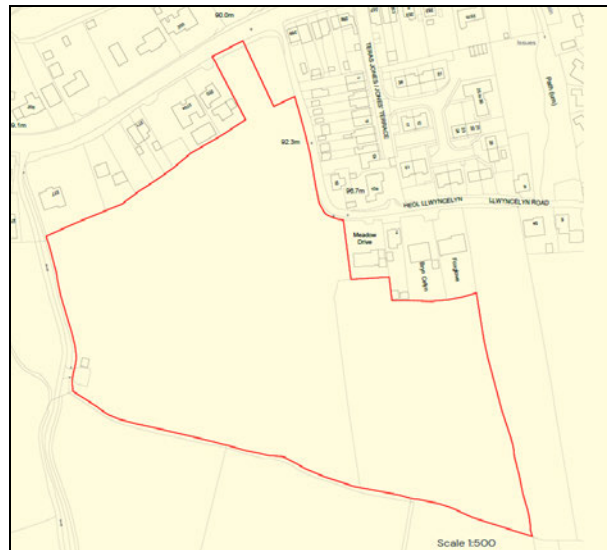
1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. has been instructed by Card Property Developments to prepare and submit an Alternative Allocation Report for the allocation of land off Cwmamman Road, Glanamau 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 a parcel of land measuring approximately 11 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, the Site consists largely of two parcels of land, both of which consist of areas of semi-improved grassland, as illustrated below.



Photograph 2

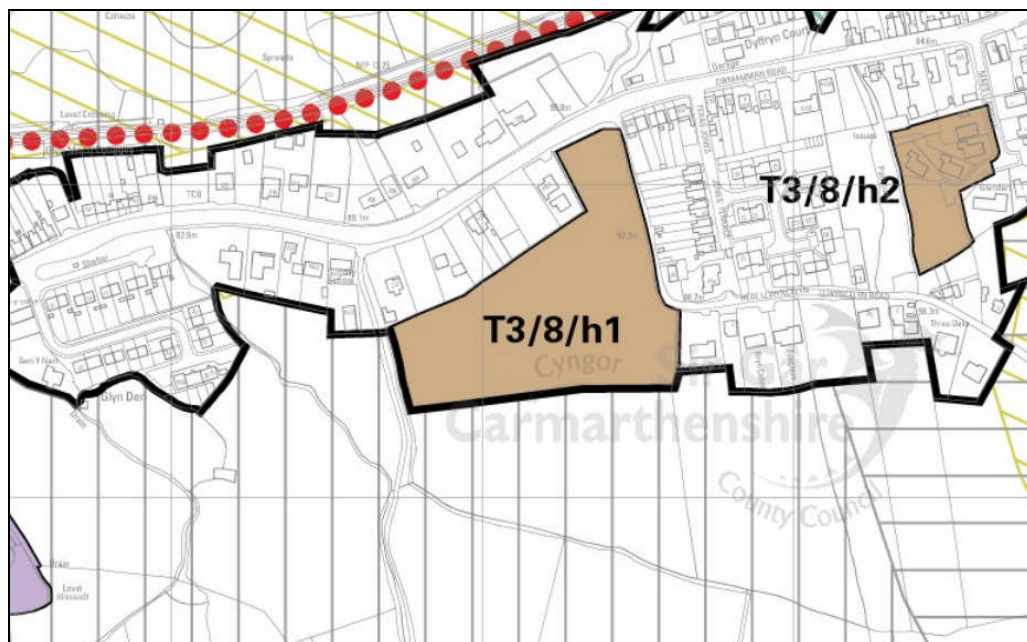


Photograph 3

2.1.3 As can be seen from the above photographs, the site slopes gently downwards in south to north direction. In addition, all its boundaries are clearly and well defined, the majority of which are mature tree lines or hedgerows. The exception is the northern boundary, which is defined by post and wire stock proof fencing that borders with Cwmamman Road.

2.1.4 Access to the site is currently gained via an existing field entrance off a private access lane that runs along the western boundary of the site. However, any future development would gain access directly off Cwmamman Road, due to the excellent visibility in both directions from this point, as established in a previous planning appeal for residential development on the site.

2.1.5 Under the provisions of the current Carmarthenshire LDP, part of the Alternative Site is currently allocated for residential development (shaded brown in Plan B).



Plan B

2.1.6 Following a positive pre-application enquiry with the Authority (LPA Ref. No. PRE/01244), our Clients (the new owners of the site) are now progressing with a planning application for the current allocation area. However, due to the level of demand for new housing in the area, this submission as part of the 2nd Deposit LDP consultation process therefore seeks allocation of the remainder of the land ownership for residential development purposes.

2.2 THE ADJOINING SETTLEMENT

2.2.1 As detailed above, the Alternative Site adjoins the existing built form of the settlement of Glanaman and is in fact bordered by it on much of its three sides. The Site is also located a short distance from the settlement's core to the north east and within walking distance of a number of its community facilities and local services.

2.2.2 Access to further facilities in adjoining settlements and those areas adjoining the County can then be gained by regular bus services (including numbers 64, 124, 145 and 146), a number of stops for which are within a short walk of the Alternative Site.

The strong sustainable position of the urban area should therefore be given full consideration when considering potential future growth options.

2.2.3 In terms of planned growth for Glanaman/Garnant, the 2nd Deposit LDP currently contains only two small housing allocations (amounting to only 20 units) for the Plan period. This in itself is surprising, considering the sustainable qualities of the settlement and in particular the current land owners commitment to the development of the Site in question.

2.2.4 In addition to the above, the proposed Alternative Site lies in close proximity and is well related to one of the 3 identified Principal Centres within the 2nd Deposit LDP. 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 2nd Deposit LDP for the Principal Centre in question, it has been identified that a number have significant questions over their ability to be delivered within the Plan period, including the following:

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

Table 1

2.2.5 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 84 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 84 residential units. As detailed above, the accompanying illustrative layout (reproduced below) demonstrates that the site is capable of accommodating this number in a deliverable and sustainable manner.



Plan C

3.1.2 As illustrated above, the site is potentially capable of accommodating a mix of unit sizes and types, with the associated density – 84 units – having therefore taken into consideration this potential mix. Such a mix would also include a proportion of affordable units.

3.1.3 With regards then to access, it is proposed that the Alternative Site would be served be a new access point (following that approved previously) directly off Cwmamman Road, running along the Site's northern boundary. The Site would then be served by a new public highway designed to adoptable standards, as well as a series of private shared drives where required.

3.1.4 The Alternative Site proposal would also retain and strengthen 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.

4.2 HISTORICAL ASSETS

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



Plan E

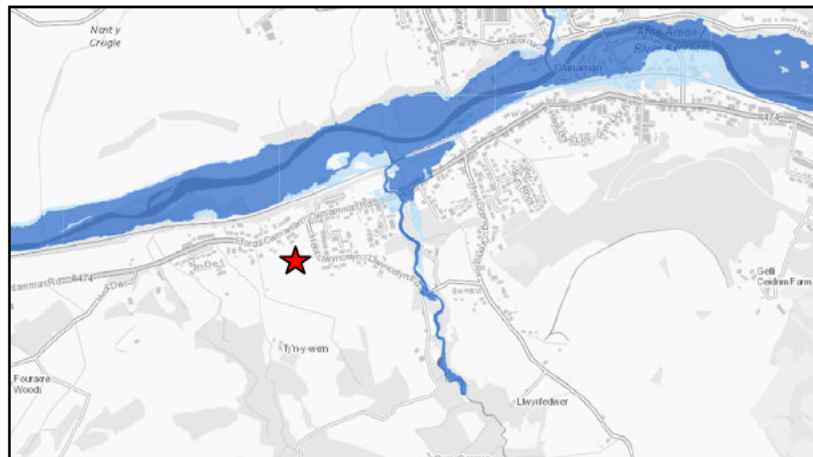
4.2.2 As can be seen, neither the Alternative Site nor immediately adjoining element of the settlement includes any Scheduled Ancient Monuments, Listed Buildings or Conservation Area's. As a result, the development of the Site would not have any detrimental impact on the setting or interest of any nearby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



Plan G
(Flood Maps for Planning)

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

4.3.3 Much of the Amman Valley has a history of previous coal mining activity and the area around the Alternative Site is no exception, as illustrated by the accompanying Coal

Minin Risk Assessment report prepared for the soon to be submitted planning application. However, as can be seen from the accompanying report, there are no fundamental attributes associated with the areas mining history that would prevent the delivery of the Alternative Site.

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 £1,250 per metre (allowing for ground conditions)
- 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 84 units, with 16 units being made available on an affordable basis (based on 16 three bed units).

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
2 Bed Det House (88 sq. m.)	110000	38	4180000
3 Bed House (115 sq. m.)	143750	30	4312500
3 bed bungalow (120sq m)	150000	5	750000
4 Bed (144 sq m)	180000	11	1980000
Road Construction	1200	800	960000
Utility Connections	5000	84	420000
Professional Fees	-		1758548
Sprinklers	3500	84	294000
Parks and Education Cont.	5000	84	420000
Total			5832548
Sales			
3 Bed semi(115 sqm) (Aff.)	78380	16	1254080
2 Bed Det House (88 sq. m.)	165000	38	6270000
3 Bed House (115 sq. m.)	200000	14	2800000
3 bed bungalow (120sq m)	230000	5	1150000
4 Bed (144 sq m)	265000	11	2915000
Total			14389080
Developers Profit	Total		2590034.4
Residual Land Value			5966497.6

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 4-5 years from the adoption of the Replacement Local Development Plan.

6.0 NATIONAL PLANNING POLICY CONSIDERATIONS

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

6.1 HOUSING SUPPLY

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

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

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

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

7.0 CONCLUSION

- 7.1 Although currently undeveloped, the Alternative Site forms a logical existing element and 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.
- 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, as well as an element of the larger conurbation of Ammanford to the west. 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 Ammanford and indeed beyond, 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 proposed for allocation in the 2nd Deposit LDP in terms of their suitability and deliverability. 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.