

**CARMARTHENSHIRE  
REVISED LOCAL DEVELOPMENT PLAN (2018-2033)  
EXAMINATION**

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**SCHEDULE OF MATTERS, ISSUES AND QUESTIONS**

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## **Matter 12: Prosperous People and Places – Site Allocations**

*Issue – Are the allocated sites soundly based and capable of delivering new residential, community and commercial development over the Plan period?*

<b>Allocated Sites</b>	<b>Prosperous People and Places – Site Allocations</b>
	<b>SeC4/h2– Burry Port Harbourside PrC3/h14 – Nantydderwen, Drefach SeC9/h2 – Heol Gelynen SuV60/h1 - Land at College Bach SuV61/h1 - Land at Nieuport Farm</b>

- a) **What is the current use of the allocated site?**
- b) **What is the proposed use of the allocated site?**
- c) **What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?**
- d) **In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?**
- e) **Are the number of residential units proposed realistic and deliverable over the plan period?**
- f) **What are the mechanisms and timescales for delivering the site?**
- g) **Is the allocation of the site essential to ensure the soundness of the Plan?**

Detailed proformas for all allocated housing sites can be found in the submission documents CSD104 – CSD109.

## SeC4/h2 – Burry Port Harbourside

- a) Extensive vacant brownfield site, which in part used to accommodate the former Grillo Zinc Oxide factory site. The southern part of the site currently accommodates a Coastguard building and a boat yard.
- b) The subject site of 6.15 hectares has been included in the Deposit Revised LDP under site reference SeC7/h3, the allocation is for a total of 364 dwellings

### c) **Background**

This extensive brownfield site, which in part consists of the former and now cleared Grillo Zinc Oxide factory site, is a key part of the Burry Port harbour area which has been the focus for regeneration by Carmarthenshire County Council. The southern distributor road was built in Burry Port to bring forward the redevelopment of the harbour area, and recent developments include the new Welsh medium school for Parc Y Tywyn and a new RNLI station.

The most recent Section 73 applications to extend the period for submission of reserved matters on the site were granted on the 2nd February, 2023 under references PL/04823 and PL/04824. These permissions have extended the period for reserved matters submission until the 25th November, 2027.

The previous planning applications on this site have been informed by a significant amount of supporting survey work and assessments.

### **Flood Risk**

In terms of flood risk, the site is with Zone A as defined by the Development Advice Maps referred to under TAN15 and this is reflected within the SFCA undertaken as part of the Deposit LDP.

Approximately 50% of the site falls within the NRW Flood Zone rivers (zone 2) and approximately 60% falls within NRW Flood Zone Seas (zone 2) For reference approximately 15% falls within NRW Surface Water and Small Water

Courses (zone 2&3). The recent Section 73 application was accompanied by a FCA which was assessed in detail by NRW who raised no objection.

### **Ecology and Habitat**

A significant number of ecological survey works and assessments have undertaken on the site which have been assessed by both the Authority's Planning Ecologist and NRW and who have raised no objection subject to conditions and planning obligations. In order to compensate for the loss of open mosaic brownfield habitat land has been transferred internally within CCC to provide a provide a local nature reserve at Morfa-Berwick, Llanelli and a financial contribution of £137,500 made towards its management over a 25-year period.

An appropriate assessment under the habitat regulations in relation to previous applications has concluded that the proposed development will not have an adverse effect on the adjacent European Protected site subject to mitigation that forms suitably worded conditions on the permissions themselves.

### **Contamination**

The outline planning permissions and the subsequent Variation of Condition Applications identify the requirement to provide a number of assessments associated with contamination on the site. These include the requirement for remediation strategies and pollution prevention plans, and form part of a number of planning conditions set out within the outline permissions and to be considered as part of any subsequent detailed planning application.

### **Drainage**

Applications on the site have been accompanied by drainage strategies that proposed separate foul and surface water systems. Compliance with the CBEEMS Memorandum of Understanding has been proven by removing surface water runoff currently entering the combined sewer system and re-directing through the proposed surface water sewer and outfall. Dŵr Cymru/Welsh Water has raised no objection.

## **Heritage**

Whilst there are heritage assets in the immediate vicinity including the Iron Tug Boats Scheduled Monument and the Harbour Walls, Breakwater and Locks Listed Building, it is considered that the site's re-development will not adversely affect the setting of these historic features.

## **Highways**

With regards to highway matters, the site is immediately south of the Southern Distributor Road, which was constructed at significant expense by CCC to bring forward the harbour regeneration sites. There are no highway or access constraints. The previous planning applications on the site were accompanied by Transport Assessments which were considered by the Highways department who raised no objections subject to conditions. The site is close to the town centre of Burry Port and benefits from active travel opportunities.

## **Summary**

The previous outline application and subsequent S73 applications have been informed by a significant amount of supporting information and were subject to extensive consultation with statutory consultees. Consultees including NRW, DCWW, Carmarthenshire Highways and Ecology raised no objection subject to the imposition of conditions and agreements including conservation and enhancement of offsite brownfield habitat.

Planning application S/30601 was approved in November 2015 for an enabling works scheme comprising of drainage infrastructure and a new vehicular entrance from the existing B4311 to serve the developments at the former Grillo site and sites 5&6. The proposed link road would serve as the principal spine road and will provide sufficient linkages which interweaves into a network of routes in and around all sites. Works were undertaken in November 2020 which constituted a technical start to confirm the planning permission S/30601 is valid in perpetuity.

The former Grillo is under the ownership of Carmarthenshire County Council. Freehold was acquired in 2020. No significant constraints have been identified.

- d) The Financial Viability Report (FVA) prepared by Burrows-Hutchinson considers the Burry Port Harbourside site as a development of 364 new homes for the purposes of the assessment. In terms of the high-level viability considerations of the Burry Port Harbourside site, reference is drawn to Paragraph 4.18 within the addendum to the 2022 Financial Viability report. BHL's estimates of the likely selling prices for new homes on the Harbourside, Burry Port site, which is considered to be a relatively rare "waterside" development opportunity, have been based largely on the upper range of the existing financial evidence of the high-level report. The site should command strong values, if its development is planned and executed successfully.

Reference is also drawn to Paragraph 4.48 of the addendum report which identifies that preliminary investigations have been made in respect of infrastructure upgrades that are likely to be required. In particular, BHL has been provided with technical notes relating to drainage and remediation works, which will include:

- a new access road in a southerly direction from the B4311 distributor road to the Estuary shoreline;
- a main foul sewer routed within the new access road to carry lateral discharges from the development site, connecting to a new pumping station;
- a new rising main carrying pumped flows from the new pumping station northwards beneath the new access road, then eastwards along the Distributor Road verge into an existing gravity sewer, which outfalls to the existing DCWW Pumping Station;
- a new surface water drain routed within the new access road to carry lateral discharges from the development site; which will combine with an existing main drain carrying surface water from existing properties to the north of the B4311 road in the general area of Silver Terrace and Glanmor Terrace.

Previous high-level cost estimates for these works have been increased in line with the BCIS All-In Tender Prices index for the purposes of this latest FVA.

The FVA indicates that it should be viable for this site to deliver a policy compliant scheme, including the requirement in proposed Policy AHOM1 for 25% of the new dwellings to be affordable homes.

In respect of the affordable housing figure set out within Policy HOM1 this equates to 72.8 affordable homes which reflects the 20% target figure set out within the outline planning permissions.

- e) Yes, progress has been made towards development with outline planning permission being granted, and detailed planning permission for enabling infrastructure works being granted and commenced.

It is proposed to release this housing site to the market by April 2026. Reference is drawn to the housing trajectory for the site which states that the first completions of the site would take place in 2026-2027. It should be noted that the trajectory was completed in April 2024 which pre-dates the most up to date information considered within this statement.

- f) The Llanelli Waterside Joint Venture between the Welsh Government and Carmarthenshire County Council has been a flagship partnership delivering an ambitious Regeneration Strategy for Llanelli coast.

Dating back to the 1990's, significant progress has been made on many of the sites along the Llanelli coast including major infrastructure investment, the Coastal link road; residential developments at North Dock and Machynys; the Jack Nicklaus designed golf course; the Dragon 24 office development at North Dock; the renovation of the harbour and the construction of the 100% let Dyfatty Park in Burry Port.

Changing portfolios within Welsh Government has meant a change of direction for the resource commitment. As resource commitment has reduced, the

expectation of additional policy commitment has increased which has had wider implications on the ability to release and develop the sites. Subsequently, Welsh Government have confirmed their request to dissolve the partnership which is currently working through a process with both parties' legal teams.

Carmarthenshire County Council have confirmed their commitment and following the finalisation of the dissolution to the agreement an updated disposal strategy will be confirmed for delivery.

As aforementioned, Carmarthenshire County Council will be looking to release the Burry Port housing site to the market by April 2026.

The sites will be released formally to the market with a view of obtaining a capital receipt to offset spend already made, while also supporting the cost of site management, planning applications and release of additional sites. Interest has been shown on this site which has been put on hold while CCC has been waiting on confirmation of Welsh Governments position.

- g)** No, whilst the number of dwellings on the site is large and contributes to the overall housing allocation within Burry Port, a Service centre, it is not considered that the site is essential to ensure the soundness of the Plan. The site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Tier 2 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 2.

## PrC3/h14 Nantydderwen, Drefach

- a) Two parcels of vacant land
- b) Residential with an indicative figure of 33 dwellings
- c) The allocation site represents a logical rounding off of the Nant Y Dderwen estate, which is sustainably located in close proximity to facilities in Drefach.

There are no environmental or ecological designations associated with the site. The two parcels of land consist of grassland with areas of trees and hedges representing the areas likely to be of most ecological interest. Appropriate ecological surveys and assessments will need to inform scheme design however it is considered that there are opportunities to retain, mitigate for any loss, and enhance in terms of ecology.

The sites are within Zone B as defined by the Development Advice Map referred to under TAN15 whilst there is some surface water and small watercourse flood risk. The site is partially in flood zone 3 and 2 for surface water and small watercourses. Whilst this is likely partially related to a watercourse which flows through both of the parcels, a flow route unrelated to mapped watercourses is also represented in the flood map. A FCA will be required for this site at planning application stage, demonstrating a sequential approach to development and that flooding elsewhere will not be increased as a result of development. It is considered that scheme layout can be appropriately designed to mitigate any risk in this regard, whilst an appropriate surface water drainage strategy based on suds principles will design out the surface water flood risk.

Whilst the site is within a mineral safeguarding area (superficial sand and gravel deposit covers roughly 50% of the site), the area is already sterilised in this respect as there is sensitive development, namely residential, within 200m.



There are no highway infrastructure constraints. The site is sustainably located with a bus stop nearby at the junction with Capel Seion Road, and a public right of way along the east that along with local pedestrian infrastructure provides opportunities for active travel.

The site is outside of the defined high risk area associated with historic coal mining legacy.

It is therefore considered that there are no land ownership or infrastructure constraints relating to the site.

- d)** Yes. As aforementioned there are no identified constraints. Viability work has been undertaken (submission document CSD31 and CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver affordable housing. Whilst no viability appraisal has been sought for this allocation, there are no known constraints that would make development of the site economically unviable.
- e)** Yes. It is considered that the delivery of 33 dwellings during the plan's lifetime is deliverable and realistic.
- f)** The site is within the Council's ownership and they are currently considering options for housing delivery. It is anticipated that the 33 dwellings will be built in the following years: 10 in 2028/29; 10 in 2029/30; and, 13 in 2030/31.
- g)** No, the site is a relatively small site located in a principal centre. Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Principal Centre, the site forms an allocation in a

sustainable location that will contribute towards the housing figure proposed in settlement cluster 3.

## SeC9/h2– Heol Gelynen

- a)** The site forms part of an existing housing estate where six former houses were demolished, leaving vacant land immediately adjacent to the existing built form.
- b)** Residential Land
- c)** The allocation site represents a logical rounding off of the Heol Gelynen estate, which is sustainably located in close proximity to facilities in Brynamman.
- d)** No significant constraints have been identified. A detailed site proforma has been produced (submission document CSD105). Whilst there are no environmental or ecological designations associated with the site, since the demolition of the former houses, the site has begun to re-vegetate (including scrub and trees), and so future planning applications for the site will need to address the relevant material considerations in relation to ecology and biodiversity.
- e)** Whilst no viability appraisal has been sought for this allocation, there are no known constraints that would make development of the site economically unviable. Viability work has been undertaken (submission document CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver affordable housing.
- e)** Yes, it is considered that the number of dwellings proposed (8) are realistic and deliverable. In planning terms, the site is a logical location for housing development, having an access road and infrastructure in place associated with this long-established housing estate.

- f)** The landowner (namely the local authority) has indicated that whilst the site is not in the current short-term programme for development, the site would be developed through council delivery mechanisms, or consideration will be given to its disposal on the open market to generate a capital receipt for the HRA. Consequently, the 8 units have been estimated to be developed towards the end of the plan period – 4 in 2031-32 and 4 in 2032-33.
- g)** Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Tier 2 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 3.

## SuV60/h1 - Land at College Bach

- a) Agricultural
- b) Residential
- c) The allocation provides one of few appropriate opportunities for small scale development in Llangynog. The size and scale of the site will be of interest to small scale developers. The site is enclosed and surrounded by existing dwellings and is within the urban form of the settlement. There are no significant constraints to delivery, any constraints will be overcome at application stage.

The site is within an area of Category 1 High Specification Aggregate – Sandstone, however the resource at this location is considered to be already largely sterilised as it is within 200m of sensitive development.

The western boundary of the site is lined by a hedgerow, the design of the access will need to take this into consideration and on the northern boundary of the site necessary buffers will need to be integrated into the design / layout. Consideration will also need to be given to the ordinary watercourse on the South East of the site.

- d) Viability work has been undertaken (submission document CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver affordable housing. Whilst no viability appraisal has been sought for this allocation, there are no known constraints that would make development of the site economically unviable. The site will be required to provide a commuted sum contribution towards Affordable Housing

- e) Yes, it is considered that the number of dwellings proposed (6 dwellings) are realistic and deliverable within the Plan period.
- f) The landowner has been contacted and they are looking to commence on delivering the site in 2025, in line with the trajectory. We foresee the first 2 dwellings being completed in 2025-26, with another 2 being built in 2026-27 and the final 2 being completed in 2027-28.
- g) No, the site is a small site located in a sustainable village. Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Tier 3 settlement, the site is an allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 6.

## SuV61/h1 - Land at Nieuport Farm

- a)** Agricultural
- b)** Residential
- c)** Reserved Matters was approved in 2010 for 5 dwellings, ground work has commenced. A Non Material Amendment application was submitted in 2021 and was granted in the same year. The landowner as part of the Candidate Site application stage submitted a parcel of land directly adjacent to the permitted site. A part of this Candidate Site has been included which will allow a total of 10 dwellings to be delivered on the combined site area.

No significant constraints, any constraints will have been raised in application W/21251 and PL/02770.

Since the submission of the planning application DCWW have indicated limited capacity in the Waste Water Treatment works, however this is the only site in Pendine to be allocated, and therefore represents a small level of growth within the village. Any increase to the development will require reinforcement works, either through developer contribution or a future AMP.

6% of the site is classified as Grade 3a agricultural land. The site forms part of a farmyard and associated buildings with the majority of the site classified as urban on the Predictive ALC Map. It is acknowledged that 6% of the site area is identified as Grade 3a however this forms part of the farmyard and has been used for storage of equipment and vehicles over the past 20 – 30 years if not longer.

- d)** Viability work has been undertaken (submission document CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver

affordable housing. Whilst no viability appraisal has been sought for this allocation, there are no known constraints that would make development of the site economically unviable

- e)** Yes, it is considered that the number of dwellings proposed (10 dwellings) is realistic and deliverable. The density on the site is reflective of the surrounding area. Although permission has only been granted for 5, the agent has indicated that site is capable of being extended or re-planned to accommodate 10 residential units
- f)** It is anticipated that the 10 dwellings will be built beginning in 2026-27 to be completed in 2028
- g)** No, the site is a small site located in a sustainable village. Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Tier 3 settlement, the site is an allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 6