



Hearing Statement – Session 9 – Matter 9

Prosperous People and Places – Site Allocations

(Cluster 3 – Ammanford including Betws and Penybanc)

On behalf of Parc Emlyn Developments Limited

Representor IDs 5620 & 5621

In respect of the Second Deposit Carmarthenshire

Revised Local Development Plan (2018 - 2033)

Deposit Plan site reference PrC3/MU1 – Emlyn Brickworks

(Other references SR/132/009, CA0629 and AS2/132/006)

20 September 2024

1. INTRODUCTION

- 1.1 This Hearing Statement is submitted in response to the Schedule of Matters, Issues and Questions, on behalf of Parc Emlyn Developments Limited ('Parc Emlyn'). It has been prepared by Adrian Thompson MRPTI, Director of Lightwater TPC.
- 1.2 The Statement is submitted in respect of **Matter 9** (Prosperous People and Places – Site Allocations – Cluster 3 – Ammanford including Betws and Penybanc), and specifically allocated site PrC3/MU1 - Emlyn Brickworks. It is comprised of four sections
- 1 Introduction
 - 2 Response to the questions issued under Matter 9
 - 3 Site update, and
 - 4 Further Statement.
- 1.3 Where relevant the comments will refer back to the representations submitted on the Deposit Plan ('PED/DP') and to the Statement of Common Ground agreed between Carmarthenshire Council and Parc Emlyn (Examination Document CSD187).

Background

- 1.4 Parc Emlyn supports the allocation of land at the former Emlyn Brickworks for a residential-led, mixed-use development (site allocation PrC3/MU1) and the timing and number of new homes forecast to be delivered within the plan period.
- 1.5 However, the arbitrary exclusion of a large portion of the existing allocated area from the proposed allocated area, and its exclusion from within the defined settlement boundary, is not sound.
- 1.6 Parc Emlyn seeks amendments to the extent of the proposed allocated area and the defined settlement boundary line, to include all of Parc Emlyn's land.
- 1.7 An illustrative Initial Masterplan drawing was supplied with the representations submitted on the consultation on the Second Deposit Local Plan, the coloured areas of which depict the extent of the land which should be allocated.
- 1.8 Parc Emlyn owns the majority of the land which the Council propose be included in the site allocation PrC3/MU1, at the former Emlyn Brickworks (all except the blue 'community use' land as shown on the Initial Masterplan drawing). Parc Emlyn owns all the additional land which it proposes should be included in the allocation.

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

a) What is the current use of the allocated site?

2.1 Brownfield. The site is currently vacant.

b) What is the proposed use of the allocated site?

2.2 Mixed use, primarily for residential development with potential to include some community focussed development (subject to engagement with stakeholders and the local community).

c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

2.3 The site lies within a Mineral Safeguarding Area and an area which has high levels of carbon (peat). See Examination Document CSD106 (Site Allocation Assessment – Cluster 3 – Feb 2023 – 193rd page).

2.4 Sandstone deposits underlie the site, however the resource at this location is considered to be already largely sterilised as it is within 200m of sensitive development. See Examination Document CSD106 (194th page).

2.5 The Site Allocation Assessment says the site is expected to contain peat (see Examination Document CSD106, 196th page). The site does not contain peat boglands (see paragraph 5.8, bullet point 12, on page 10 of the PED/DP). Any peat is buried, potentially at significant depths (see paragraph 5.9 on page 10 of the PED/DP and the Desk Top Study Review and Coal Mining Risk Assessment (May 2022) by Tetra Tech, submitted alongside PED/DP). The Site Allocation Assessment concludes that mitigative policies set out within the Deposit Local Plan are expected to address the effects of building on areas of peat. See Examination Document CSD106 (196th page).

2.6 Neither constraint is therefore a significant obstacle 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?

2.7 A Development Viability Model has been completed in accordance with the approach set out by the Council. It takes account of the constraints and the need to provide affordable housing. It is understood the Council are satisfied with it and have submitted it to the Examination. It shows the allocation to be economically viable.

e) *Are the number of residential units proposed realistic and deliverable over the plan period?*

- 2.8 As set out in the Statement of Common Ground (Examination Document CSD187, section 7), a small part of the overall allocation is not owned by Parc Emlyn. In respect of the part of the allocation that is within the ownership of Parc Emlyn, the anticipated build-out rate is as set out in the Statement of Common Ground.
- 2.9 The build-out rate shown comes from Parc Emlyn. It is relatively modest. It takes a cautious approach to potential fluctuations in demand. It is realistic.
- 2.10 The units in the early years will come from the area known as Phase II. Full planning permission for this area was granted in July 2023 (see Examination Document CSD189). The submission of applications to discharge pre-commencement conditions is awaiting approval of a non-material amendment (see section 2 of the Statement of Common Ground and Site update below). The build-out rate shown in the Statement of Common Ground could be affected by the delay in determining the application for the amendment, because it was based on development commencing on site in 2024. However, a lower build-out rate in year one can be compensated for by a higher build-out rate in the final year, and or a slightly higher rate across some of the other years.
- 2.11 The build-out rate allows time for the preparation and submission of an application for the land south of the spur link road; see response to question ‘f’ below.
- 2.12 The completion of the spur link road (and the associated main economic link road) is a significant factor supporting the deliverability of new homes at this location. See also paragraph 11.546 of the Deposit Plan. See too section 5 of the Statement of Common Ground.
- 2.13 Section 6 of the Statement of Common Ground confirms there are no outstanding infrastructure provision matters that cannot be dealt with at the planning application stage.
- 2.14 The Delivery Assessment in section 7 of the Statement of Common Ground concluded that there is clear evidence the site (that part of the allocation under the ownership and control of Parc Emlyn) is deliverable within the timescales set out in the Deposit plan’s Housing Trajectory. It remains the case that the number of residential units allotted to this land are deliverable over the plan period.

f) *What are the mechanisms and timescales for delivering the site?*

2.15 Parc Emlyn Developments Limited will build out the development itself and is not reliant on finding a development partner to do so. The timescales for delivery are set out in section 7 of the Statement of Common Ground. Planning permission is in place for Phase 2 (north of the spur link road). The following sets out the broad timescale to the point of commencement of delivery on Phase 3

Q3 2024 Council approve the non-material amendment to the permission for Phase 2.

Q4 2024 – Preparation and submission of details to discharge planning conditions, and approval of details by the Council.
Q1 2025

Everything below relates to Phase 3

Q2 2025 – Appointment of consultancy team, collation of baseline data,
Q2 2026 conduct on-site research and surveys, preparation for, conduct of and reporting on engagement and consultation with key stakeholders and local community on development of Masterplan and planning application (full or hybrid).

Q3 2026 – Launch of formal pre-application consultation exercise, collate
Q4 2026 and report on responses, complete planning application and submit.

Q1 2027 – Planning application assessed and permission granted.
Q2 2027

Q3 2027 – Preparation and submission of details to discharge planning conditions, and approval of details by the Council.
Q4 2027

Q1 2028 Contingency

Q2 2028 – Ground works commence on site, followed by construction of
Q4 2028 houses and then fitting out. Houses completed and first five ready for sale.

Q1 2029 Date by which Phase 3 need to have delivered its first five houses.

g) *Is the allocation of the site essential to ensure the soundness of the Plan?*

2.16 Yes, the allocation is essential to the delivery of the number of homes which need to be delivered over the Plan period (see paragraph 9.57 of the Deposit Plan) and as such is essential to ensure the soundness of the Plan.

- 2.17 Pen-y-groes and Emlyn Brickworks are part of the Cross Hands area, a key focus for new homes and jobs within the A48 corridor (see para 10.14 of the Deposit Plan). Cross Hands is identified as one of the ten ‘rural towns’¹ referenced in Chapter 3 of the ‘Moving Rural Carmarthenshire Forward’² paper, (see paragraphs 10.16 and 9.22 of the Deposit Plan). Ammanford / Cross Hands is one of the strategic growth areas identified in the New Spatial Approach set out in the Deposit Plan (see paragraph 9.4). The delivery of new homes at Emlyn Brickworks will therefore contribute to the achievement of the wider spatial strategy set out in the Deposit Plan (see paragraph 8.20 of the Deposit Plan). It will deliver on advice in the Development Plans Manual to achieve a balance between homes and jobs thereby reducing the need for commuting (see paragraphs 5.25, 5.30 and 5.49-5.50) and on guidance in Planning Policy Wales (edition 12) at paragraph 3.42, to achieve a balance between the number of homes provided and expected job opportunities, to minimise the need to travel.
- 2.18 Paragraph 9.22 introduces and sets the context for the development of economic growth plans for each of the respective places in the ‘Ten Towns’ initiative. The Examination Document LPG9 ‘Ten Towns’ is a link to a web page. Following the links leads to the Cross Hands Sustainable Economic Growth Plan (2022). This too supports the allocation of land at Emlyn Brickworks for a mixed-use development, as part of the Growth Plan’s strategic vision for the economic recovery and long-term prosperity of the Cross Hands area. The role of Emlyn Brickworks in contributing to this is set out on page 19; and clearly anticipates the development of the whole 21 hectares of the site and not just that part proposed for allocation in the Deposit Plan.

3. Site update

Implementation of the planning permission on Phase II

- 3.1 The Statement of Common Ground reports at section 2 that applications for the discharge of pre-commencement conditions was expected in spring / summer 2024.
- 3.2 Prior to making these applications, Parc Emlyn has sought confirmation from the Council that a proposed re-wording of some of the conditions was a non-material amendment. This re-wording would allow for the phased submission of details, rather than requiring the submission and approval of details across the entire site before work could commence in any one part of it.
- 3.3 The application seeking approval of the non-material amendment was submitted to the Council on 8 March 2024. Confirmation the amendment is acceptable has been provided verbally. A formal decision is awaited.

¹ Examination Document LPG9

² Examination Document LPG5

The Cross Hands to Llandybie shared use path

- 3.4 The Statement of Common Ground refers in Section 5, on access, to the delivery of the Cross Hands to Llandybie shared use path. One of the priorities of the Cross Hands Sustainable Economic Growth Plan is to significantly improve active travel between employment and residential areas (page 24 of the Growth Plan). See also Deposit Plan Appendix 5 (Active Travel Routes), scheme CH25 Cross Hands (long distance aspirational route joining Cross Hands with Ammanford via Blaenau / Llandybie).
- 3.5 Phase 3 of the path was granted planning permission on 15 November 2023. An application for the discharge of two of the three pre-commencement conditions was submitted on 1 July 2024 and a decision is awaited.
- 3.6 On 12 September 2024, Parc Emlyn met with officers from the Council who are involved in the delivery of the shared use path, to discuss the scope for it to continue westward across the Emlyn Brickworks site, as part of the final phase, Phase 4. Phase 3 of the route is shown on drawing DE-02 Rev C, attached to the Statement of Common Ground. The main points of relevance to arise from the meeting were as follows
- The shared use path is an Active Travel route.
 - The Council's preference is for Phase 4 to be routed across the Emlyn Brickworks, to connect with the spur link road, which was built with a suitable pedestrian / cycle shared path along one side of it. The route will follow the main new economic link road to the employment area at Cross Hands.
 - The project is about linking places people want to get to. There is therefore interest in integrating the path with a potential community focussed development to Waterloo Road (where the old rugby club and community hall are) and in a spur link to Penygroes Park and the other sport and recreation space off Bryncwar Road (south of Gors Ddu Road).

4. Further Statement

- 4.1 The responses set out in section 2 above are equally applicable to the wider area Parc Emlyn seeks to see allocated by means of a Matters Arising Change.

[END]