

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

SCHEDULE OF MATTERS, ISSUES AND QUESTIONS

Matter 8: Prosperous People and Places – Site Allocations (Cluster 2 – Llanelli)

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

Allocated Sites	PrC2/h1 - Beech Grove, Pwll PrC2/h4 - North Dock PrC2/h10 – Land adjacent to the Dell, Furnace PrC2/h16 - Ynys Las, Llwynhendy PrC2/h20 – Harddfán PrC2/h22 - Cwm y Nant, Dafen PrC2/h23 - Dafen East Gateway SeC6/h2 - Land between Clayton Road and East of Bronallt Road SeC7/h1 – Box Farm SeC7/h3 - Golwg Yr Afon SeC8/h2 – Cae Linda SeC8/h3 - Golwg Gwendraeth SuV23/h1 - Clos y Parc SuV23/h2 – Adjacent to Little Croft
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- 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?
- h)

Detailed proformas for all allocated housing sites in Cluster 2 can be found in submission document CSD105 ([site-allocation-assessment-cluster-2-complete.pdf](https://gov.wales/sites/default/files/2023-05/csd105-site-allocation-assessment-cluster-2-complete.pdf) (gov.wales))

PrC2/h1 – Beech Grove, Pwll

a) Agricultural

b) Residential

c) The site is currently allocated for housing in the Adopted LDP.

The site is not subject to any ecological or environmental designations. The southern, western and eastern boundaries of the site are defined by trees and hedges. With the exception of a section of the southern boundary which will need to be removed to facilitate access, the remainder can be retained. The majority of the site consists of agricultural grazing land with limited ecological value.

There are no constraints in terms of flood risk, heritage or agricultural land quality.

The site appears to be within a High-Risk Development Area in association with historic coal mining activity which is not uncommon for the Llanelli area. A planning application will therefore need to be informed by a Coal Mining Risk Assessment.

Whilst the site is within a mineral safeguarding zone, this is not considered to be a constraint to development as the site is already within 200m of sensitive development and thus largely sterilised in this respect.

Access to the site is from the A484 via Maes Yr Haf and then Beech Grove. Both roads benefit from suitable carriageway widths, alignment, visibility and pedestrian infrastructure. The pavements could be extended to the allocated site as part of scheme design. There is a bus stop in close proximity to the Maes Yr Haf / A484 junction, whilst the site is within walking distance of local facilities in Pwll.

There are no infrastructure or land ownership constraints to site delivery

- d)** Yes. As aforementioned there are no identified constraints. The sale value will reflect the need to provide a planning policy compliant amount of affordable housing.
- e)** Yes. The number of dwellings indicatively proposed is reflective of housing density within the immediate locality.

This site is earmarked by the Council for sale in the 2025/26 financial year. The Council are currently considering the most appropriate method for marketing and delivering this scheme. The land is currently held within the Council's general portfolio

- f)** As aforementioned whilst the exact mechanism for delivering the scheme is yet to be decided the site is earmarked for sale by the Council in 2025/26.
- 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 the delivery of the housing target of the Revised LDP. Given its location within a Tier 1 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in cluster 2.

PrC2/h4 - North Dock, Llanelli

- a) Extensive vacant brownfield site, which in part used to accommodate the former Pontrilas Factory
- b) Residential
- c) Outline planning permission was previously granted for the construction of up to 210 residential units with associated landscaping and infrastructure works on the 2nd November, 2021 under planning reference S/38285. A Section 73 application to extend the period for submission of reserved matters for a further 5 years is currently being prepared and will be submitted to the Local Planning Authority for determination in September/October 2024.

The original outline application was informed by a significant amount of survey work and assessments. Where required, such reports are being updated to inform the Section 73 submission.

The former Pontrilas factory has been demolished under a demolition notification granted on the 7th November, 2017 (S/36027) in order to facilitate the redevelopment of this site.

The site is owned by the Llanelli Waterside Joint Venture – a partnership between Carmarthenshire County Council and Welsh Government. The previous outline application S/38285 was informed by a significant amount of supporting information and was 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 relating to highway and active travel improvements, and habitat management.

The application site is located within Zone A as defined by the Development Advice Maps referred to under TAN15. A Flood Consequences Assessment did nevertheless accompany the previous outline application and was assessed in detail by Natural Resources Wales who raised no objection of flood risk grounds.

An updated FCA will accompany the Section 73 application however it is expected that its conclusions and recommendations will remain the same.

The previous outline application was accompanied by a drainage strategy that proposed separate surface and foul water systems. Surface water was to be disposed of via on site suds to a surface water sewer whilst foul water was to go to the mains. Compliance with the CBEEMS Memorandum of Understanding was proven by re-directing surface water runoff from an existing impermeable area of hardstanding away from the combined sewer and via the new surface water drainage system proposed. Dwr Cymru/Welsh Water raised no objection to the previous outline application.

The previous outline application was accompanied by a significant amount of ecological surveys and assessments which will be updated to inform the Section 73 application. These were scrutinised in detail by the Authority's Planning Ecologist and NRW who raised no objection subject to conditions and an offsite habitat management contribution of £30,864.77 that was paid. An Appropriate Assessment was undertaken which concluded that subject to mitigation secured via appropriately worded conditions on the outline planning permission there would be no adverse effect on the adjacent European Protected site. NRW agreed with the conclusions of the appropriate assessment.

There are no highways or access constraints to the site's development. The previous outline application was informed by a Transport Assessment which was assessed by the Authority's Highways Department, who raised no objection subject to conditions, whilst financial contributions towards offsite highway improvements and active travel were paid. £10,000 towards improvements at Sandy Road roundabout and £25,000 towards active travel improvements were paid.

- d)** The Financial Viability Report (FVA) prepared by Burrows-Hutchinson considers the Land at North Dock site as a development of 210 new homes for the purposes of the assessment. 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

- e) Yes, progress has been made towards development with demolition works taking place and outline planning permission being granted. Once the Section 73 is submitted and approved, it is proposed to release this housing site to the market by April 2025.
- 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 to the Llanelli Waterside 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 North Dock housing site to the market by April 2025.

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 Llanelli, a principal 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 1 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 2

PrC2/h10 – Land adjacent to the Dell, Furnace

- a) Former Quarry
- b) Residential
- c) The following constraints have been identified

Important ecological connectivity features within the site - NRW provided comment as part of the Deposit LDP consultation referring to the ecological connectivity would be at odds with the fundamental aims of maintaining and enhancing biodiversity and your Authority's duty under Section 6, Part 1 of the Environment (Wales) Act 2016.

NRW however comment:

Following discussions on this allocation it was confirmed that the surrounding woodland will be retained to maintain a green corridor providing connectivity with the main woodland and the Dell. The mitigation required may reduce the amount of land available for development and the site would need to be allocated on this principle to ensure the soundness of the plan.

- Reference is also drawn to NRW's comments relating to records of dormice in the woodland.
 - Adjacent to zone C2 and part of the site is in FMfP zone 2 and 3 (Surface Water and small watercourse
 - Possible hydrological link to CBEEMS
- 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.

The proponent of the land submitted a viability appraisal as part of their candidate site submission in 2018. This data has not been verified.

Nevertheless, there is a developer on board who has not objected / queried the scale of planning contribution required from the site.

- e)** Yes, it is considered that the number of dwellings proposed (13 dwellings) are realistic and deliverable. The site owners are keen to progress with the development of the site. The candidate site application provided an indicative site layout of 13 large dwellings which showed that the site could accommodate the dwellings allocated within the plan. Even with any potential ecological mitigation requirement identified within the consultation responses the site is of an appropriate scale to be developed and address any identified issues.
- f)** The developer has indicated a clear focus to deliver the site. Their preference would be to submit a pre-application submission prior to the adoption of the plan with the submission of a planning application immediately post-adoption.
- 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 the delivery of the housing target of the Revised LDP. Given its location within a Tier 1 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in cluster 2.

PrC2/h16 – Ynys Las

- a)** The wider site consists of a vacant parcel of land located on the site of the former Ysgol Yr Ynys primary school, off Ynys Las.
- b)** The Deposit Revised LDP identifies the entire site under Policy HOM1 (Ref: PrC2/h16) for residential development of 33 dwellings. A care home facility is currently being built on the site.
- c)** Full planning permission has been approved for the development of the entire site for a residential development comprising 33no. dwellings and 84-bed care home with associated access, car parking, landscaping and infrastructure works in August 2023 under application reference PL/01196 No fundamental constraints have been identified on the site. The planning permission for the site requires the discharge of a number of conditions prior to its development.

A Section 73 application to vary the approval relating to the 33 residential dwellings is to be submitted in October 2024.

The site is completely owned by Padda Care Ltd and they have a development agreement in place with Sterling Construction Ltd to deliver the residential Phase 2 of the current permission and as such there are no impediments in terms of landownership as regards delivery.

- d)** The scheme will seek to deliver a 100% affordable housing scheme and as such there are no issues as regards site viability in the current circumstances.
- e)** Yes, significant progress has been made towards the future development of the Phase 2 of the site with the Sterling Construction & Bro Myrddin Housing Association about to submit a further Section 73 application to secure a 100% affordable housing scheme on Phase 2 of the site.
- f)** Given the emphasis in terms of affordable housing delivery within the County and the fact that this scheme is identified in the Council's own affordable housing

delivery programme with grant funding earmarked to the nominated RSL (Bro Myrddin Housing Association), it would be anticipated that delivery of the site in part or in full would be within year 1-5 post adoption of the Plan.

- 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 the delivery of the housing target of the Revised LDP. Given its location within a Tier 1 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in cluster 2.

PrC2/h20 – Harddfan

- a) Existing open space within the Harddfan estate but surrounded by residential built form on all sides. Forms part of a larger housing allocation in the current Adopted LDP.

- b) Residential

- c) The site has previously benefitted from outline planning permission for residential development with all matters reserved for consideration granted on the 26th May, 2016 under planning reference S/33659. Whilst this permission has lapsed, there were no identified constraints or obstacles to development.

The site is not at risk of flooding; there are no heritage or ecological designations; and there are no highway access or other infrastructure constraints.

In terms of ecology, the main area of ecological interest on and adjacent to the site are the boundary trees and hedges along the sections of the southern and eastern boundaries. Any subsequent application will be duly informed by updated ecological and arboricultural survey work. Such reports will make appropriate recommendations for any mitigation, if required, and enhancement. It is considered that such boundary features can be retained and there is an opportunity to enhance and re-inforce the boundary vegetation. A condition was imposed on the previous outline planning permission granted that required a detailed landscaping scheme including details of retention of existing and proposed.

There were no statutory consultee objections towards the previous outline planning application.

Therefore, it is considered that there are no constraints to the delivery of the site in regard to infrastructure or land ownership.

- d)** Yes. As aforementioned, there are no identified constraints, and it will be seen from the information below that progress is being made by the Council to deliver a scheme on this site.
- e)** Yes, the Council previously obtained outline planning permission for residential development on this site. Whilst this outline planning permission has since expired, it will be noted below that progress is being made by the Council to deliver a scheme on this site.
- f)** Carmarthenshire County Council's Housing Section has confirmed that brief has been prepared and sent to its internal Property Design team. They are currently progressing feasibility / concept designs for this scheme to help meet housing need for specialist C3 accommodation for individuals with learning disabilities and mental health. Once concept designs are approved (subject to costs) CCC Housing will be able to progress to detailed design, with a view to submitting an application for Planning consent.
- 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 the delivery of the housing target of the Revised LDP. Given its location within a Tier 1 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in cluster 2.

PrC2/h22 – Cwm y Nant, Dafen

- a) Agricultural
- b) Residential
- c) Outline planning permission was previously granted for the construction of up to 202 residential units with associated landscaping and infrastructure works on the 29th July, 2021 under planning reference S/40692. A Section 73 application to extend the period for submission of reserved matters for a further 5 years is currently submitted to the Local Planning Authority under planning reference PL/08091 for determination in October 2024.

The original outline application was informed by a significant amount of survey work and assessments. Where required, such reports have been updated to inform the current Section 73 submission.

In terms of the current Section 73 submission from a review of the current statutory and non-statutory consultation responses no objections have been received and we anticipate a positive recommendation in the near future.

The site is completely owned by Carmarthenshire County Council and there are no impediments in terms of landownership as regards delivery.

The application site is located within Zone A as defined by the Development Advice Maps referred to under TAN15. It is confirmed that Natural Resources Wales have raised no objection of flood risk grounds in terms of the current Section 73 application.

The previous outline application was accompanied by a drainage strategy that proposed separate surface and foul water systems. Surface water was to be disposed of via on site suds to a surface water sewer whilst foul water was to go the mains. Surface water removal will be achieved in line with the requirements noted in the CBEEMS Memorandum of Understanding (MOU),

with surface water being removed from the combined sewer at donor sites to the north east of the site. To succeed with this, the runoff from circa 1735m² of impermeable area will be diverted from the combined system to the existing surface water system. Dwr Cymru/Welsh Water raised no objection to the current Section 73 application.

The current Section 73 application was accompanied by a significant amount of updated ecological surveys and assessments which have been scrutinised in detail by the Authority's Planning Ecologist and NRW who raised no objection subject to conditions. An Appropriate Assessment was undertaken which concluded that subject to mitigation secured via appropriately worded conditions on the outline planning permission there would be no adverse effect on the adjacent European Protected site. NRW agreed with the conclusions of the appropriate assessment. An updated Habitat Regulations Screening Assessment has been submitted to support the current Section 73 application which draws the same conclusion that there would be no adverse effect on the adjacent European Protected site.

There are no highways or access constraints to the site's development. A primary vehicle access to the site is offered via Nant Y Gro in the form of a priority T junction. A secondary access to the site is provided off Gors-Fach, and pedestrian linkages are offered throughout the site. Vehicular parking will aim to be provided in the form of both on and off-street parking in line with the CSS Wales Parking Standards. The parking provision provided aims to ensure there isn't an overspill onto the surrounding highway network.

The current Section 73 application was informed by a Transport Assessment (TA) which concludes that the site is highly accessible via non-car modes of travel, the trip generation of the site will not increase over the already consented scheme and the impact of the development on the junction's operational capacity is not above what was presented as part of the approved scheme at outline stage. This TA was assessed by the Authority's Highways Department, who raised no objection subject to conditions.

The site has a history of coal mining, potentially infilled land and limited residential development. The previous coal mining activity could result in contaminated land issues should the site be developed. The site is classified as a low to moderate risk in respect of possible contaminated land liability matters. The report recommends a comprehensive ground investigation report is undertaken and would be conditioned on any subsequent approval.

A Coal Mining Risk Assessment has been compiled which concludes that shallow mine workings have the potential to cause subsidence that could possibly extend from the works coal seams up to the ground surface if it remains untreated. A Phase II ground investigation should be undertaken, comprising both shallow and deep exploratory holes and allow for geo-environmental and geotechnical laboratory testing. It should also include ground gas/groundwater monitoring installations in certain boreholes to monitor the possibility for hazardous/explosive gas generation and sample groundwater.

Depending on the results from the Phase II Investigation, if development is to occur across the site it may be required to drill and grout all land to the west of the Gors Fault, in addition to a housing exclusion zone above the Gors Fault and cap the untreated mine shaft with reinforced concrete. The Coal Authority have been reconsulted in relation to the current Section 73 application and request that the previous conditions (Condition 33 and 34 as per the approved consent S/40692) to be re-imposed on any new planning permission granted.

An updated noise report undertaken confirms that the site lies within Category A of Technical Advice Note 11 (Noise) and that any effects of noise can be mitigated which would include standard façade treatment and appropriately locating external amenity spaces.

- d)** The Financial Viability Report (FVA) prepared by Burrows-Hutchinson considers the Cwm Y Nant site as a development of 202 new homes for the purposes of the assessment. 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, at a reduced land value equating to £195,759/net hectare.

It is considered that values in this area of Llanelli will track 5% - 10% below the general tone applicable to most of the other “key sites”. The land value is also adversely affected by quite significant allowances in the FVA for “abnormal” site costs, equating to almost £300,000/net hectare. However, bearing in mind the extent of “abnormal” site costs in this instance, it is considered that this level of value is broadly in line with the benchmarks used in the High-Level Countywide Viability Studies.

- e) Yes, significant progress has been made towards the future development of the site with the Council about to secure a further Section 73 approval.
- f) It should be noted that this residential development site was previously identified by the Council for sale to the private sector with marketing targeted for the 2024 / 25 financial year. However, due to a change in the corporate objectives of the Council in terms of delivery of affordable housing within the County, the decision has been made to appropriate this land to the Housing Revenue Account to fulfil their affordable housing targets.

The current Section 73 application seeks to extend the period for the submission of future reserved matters and is close to a positive determination. It is the Council’s intention to secure a developer partner through a procurement process which will be commenced during the second quarter of 2025. It is anticipated that the pilot scheme currently being undertaken for the Carmarthen West residential site will be rolled out as a future delivery model for this and other Council sites in the future.

Given the corporate emphasis in terms of affordable housing delivery it would be anticipated that delivery of the site in part or in full would be within year 1-5 of the Plan period.

- g)** No, whilst the number of dwellings on the site is large and contributes to the overall housing allocation within Llanelli, a principal 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 1 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 2.

PrC2/h23 – Dafen East Gateway

- a)** Agricultural
- b)** Residential
- c)** Reference is drawn to the Statement of Common Ground undertaken as part of the allocation of the site which refers to the refusal of planning permission PL/04082. The constraints within the refusal notice highlighted the following:
 - impact of noise and disturbance arising from the neighbouring development at Dyfed Steel Ltd,
 - failure to provide a bat survey of all the existing trees within the site as having bat roost potential.
- d)** As part of the planning application PL/04082 the developer (Persimmon Homes) were to provide the level of planning contributions set within the Planning Obligations SPG.
- e)** As part of the planning application PL/04082 Persimmon Homes provided a detailed site layout to indicate the potential development of 145 dwellings. In light of the refusal of the planning application Persimmon are currently working on progressing amended proposals. The scheme will result in a loss of developable area along the boundary (adjacent to the highway and Dyfed Steels) to ensure that the noise impact is acceptable to Environmental Health, however Persimmon are looking to ensure the noise modelling work is tested to maximise the unit numbers of the scheme.
- f)** The housing trajectory considered the development over a 5-year period beginning in 2026/27. Given the requirement to submit a revised scheme it is considered that the trajectory is achievable and reasonable.

- g)** No, whilst the number of dwellings on the site is large and contributes greatly to the overall housing allocation within Llanelli, a principal 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 1 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 2.

SeC6/h2 - Land between Clayton Road and East of Bronallt Road

- a) Partly under construction, the remainder is vacant land.
- b) Residential Land
- c) No significant constraints have been identified. A detailed site proforma has been produced (submission document CSD105), this notes that the site is underlain by 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. Part of the site has full planning permission and is under construction. The whole site had outline planning permission, but this has now lapsed. Future planning applications for the remainder of the site will need to address the relevant material considerations such as highways and ecology.
- 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 (20 dwellings) are realistic and deliverable. In planning terms, the site is a logical location for housing development, having an access road in place leading from the first phase (the 8 units currently under construction) and being surrounded on three sides by existing residential development.
- f) Part of the site has full planning permission for 8 and is under construction, the remaining 12 units have been estimated to be developed later in the plan

period – 6 in 2028/29 and 6 in 2029/30, to allow time for the submission and consideration of a new planning application.

- 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 2.

SeC7/h1 – Box Farm

- a) Vacant Land
- b) Residential Land
- c) No significant constraints have been identified. A detailed site proforma has been produced (submission document CSD105), this notes that the site is underlain by 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 site has outline planning permission and potential constraints have been addressed as part of the planning application process.
- d) Any constraints, as well as the need to provide affordable housing, have been considered as part of the viability work associated with planning application (S/33213). Furthermore, 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. In the case of this site, matters relating to affordable housing were covered in the S.106 Agreement in planning application S/33213.
- e) Yes, it is considered that the number of dwellings proposed (7 dwellings) are realistic and deliverable. In planning terms, the site is a logical location for housing development, having an access road in place leading from the existing residential development to the north and east.
- f) The site has outline planning permission, and a variation of condition has been approved to extend the date for submission of the reserved matters application.

It is anticipated that 3 dwellings will be delivered in 2025/26 and 4 in 2026/27.

- 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 2.

SeC7/h3 - Golwg Yr Afon

- a) Vacant Land
- b) Residential Land
- c) In addition to the detailed site proforma that has been produced for this site (noted above), a Statement of Evidence has also been produced. No significant constraints have been identified, however, considerations that will need addressing at the planning application stage include:

Highways – Whilst there are no identified significant highway issues, these are matters that would need addressing as part of the detail of a planning application.

Ecology – Whilst there are no environmental designations, the site is heavily vegetated with trees, including some boundary TPO trees, and overgrowth at present. Ecological and protected species surveys have previously been undertaken and these will need to be updated to inform a subsequent planning application. Arboricultural surveys will also be undertaken. Such detailed assessments will provide the appropriate baseline position to inform scheme design in accordance with the step-wise approach advocated in Planning Policy Wales. Opportunities to retain and enhance features which provide ecological connectivity will be explored and maximised, informed by a coordinated approach to green infrastructure.

Flooding - The site is not identified in the TAN 15 Development Advice Maps as being at risk from flooding, however the new draft TAN Flood Map for Planning (FMfP) identifies small areas of the site as falling within flood zone seas (zone 3) and surface water and small water courses (zone 2&3). Consequently, any planning application in relation of the site will be required to have regard to the FMfP and be supported by appropriate evidence including an FCA.

Waste Water Treatment – matters concerning capacity at the Llangennech WWTW had been an issue, but the necessary upgrade works are no longer a factor limiting/preventing progress with development of the site. A public sewer traverses the site, which may impact the overall density, if it is not practical or viable to divert it. This matter will need to be addressed at the planning application stage.

Coal Mining Legacy - A small section of the site is within a High Risk Area associated with historic coal mining legacy, which is not uncommon for the area. Therefore, a Coal Mining Risk Assessment will be needed to inform any subsequent application.

- d) The financial viability of the site has been considered by Burrows Hutchinson Ltd and is set out in the Financial Viability Report Update May 2024 (submission document CSD32). The Report concludes that 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.
- e) Yes, it is considered that the number of dwellings proposed (50 dwellings) are realistic and deliverable. The Landowners (Carmarthenshire County Council) had undertaken survey work with a view to marketing the site and had noted that the site is allocated for disposal within the Council's 5 Year Capital Receipt Programme. Marketing had subsequently been put on hold pending capacity issues at Llangennech WWTW, however this is no longer considered an issue. While 50 dwellings is on the low side of what would normally be considered appropriate for the size of the site, it is recognised that the irregular shape, topography and site-specific constraints will have an impact on the development density.
- f) Whilst there have been time delays in respect of marketing the site, for the reasons set out above, a brief has been produced to progress the development of options for residential development of the full site. The land is within HRA ownership and will be progressed following the outcome of the feasibility

designs, with an application for planning to be made in Summer 2025. It is anticipated that the 50 dwellings will be delivered as follows: 25 in 2026/27 and 25 in 2027/28.

- g) No, whilst the number of dwellings on the site is large and contributes greatly to the overall housing allocation within Llangennech, 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.

SeC8/h2 – Cae Linda, Trimsaran

- a) Green field and Vacant Land
- b) Residential
- c) Reference is drawn to the Approval of Reserved Matters PL/03504 for 14 units (Phase 1) and a refusal of planning permission for 44 dwellings (application number PL/06937 - decision date 11th September 2024)

In respect to the constraints highlighted within the refusal notice the applicant has not provided an appropriate reptile survey of the site to establish the baseline presence. This has precluded the LPA from assessing the impact of the development upon reptiles and to determine appropriate mitigation where necessary.

Further constraints on the site include:

- Any development of the site would require ecological buffers to provide connectivity for species around the boundary of the site.
- Coal Mine entries – The Coal Authority had no objection to the proposed development subject to the LPA imposing a planning condition to secure the undertaking of further investigation to inform the extent of remedial and mitigation measure required to ensure that the proposed development was made safe and stable.
- Net benefit for Biodiversity.
- Topography
- Gas main line which would require easement

The refusal of planning application PL/06937 considers 4 reasons for refusal, with the lack of information being one of the main issues highlighted within the decision. It is considered that the concerns relating to ecology and Net

Biodiversity Benefit can be overcome with the relevant studies / assessment to be undertaken.

The other reasons for refusal include issues such as a poorly designed scheme, and the lack of a topographical survey to consider the scheme entirely.

It is considered that the site can be delivered provided that the issues raised in the reasons for refusal can be addressed.

It should be noted that 4 dwellings included within the allocated site (self-build plots at the eastern end of the site) have been built with a further two dwellings under construction in 2024/25.

- 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.

As part of the planning application for 44 dwellings (PL/06937) the applicant sought to provide the level of affordable housing set out within planning policy, whilst the education and parks provision have been calculated for the site.

- e)** Yes, it is considered that the number of dwellings proposed is realistic and deliverable. As considered above, there will be a requirement on the applicant to amend the layout to address the reasons for refusal relating to high quality design.
- f)** The housing trajectory sets out the potential for development throughout the plan period. The site has a developer on board with the potential to develop at a faster pace than suggested within the trajectory however the issues considered above will need to be addressed.

- g)** No, whilst the number of dwellings on the site is large and contributes greatly to the overall housing allocation within Trimsaran, 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.

SeC8/h3 - Golwg Gwendraeth

- a) Vacant
- b) Residential
- c) The site is under construction therefore there are no constraints identified.
- d) The issue of viability has already been considered and agreed as part of Reserved Matters PL/02850 and the deed of variation therein.
- e) The development makes efficient use of the land. The number of dwellings proposed a realistic and deliverable over the plan period.
- f) 35 dwellings have been completed in the period 2023/2024. Dandara are actively marketing homes for sale with further development taking place. Reference is drawn to the Housing Trajectory.
- g) No. The site 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.

SuV23/h1 - Clos Y Parc

The site is completed.

SuV23/h2 – Adjacent to Little Croft

a) Agricultural

b) Residential

c) There are no known identified constraints. Considerations that may need addressing at the planning application stage include undertaking ecological or environment assessments. The site is not subject to any ecological or environmental designations. The southern, western and eastern boundaries of the site are defined by trees and hedges. With the exception of a section of the western boundary which will need to be removed to facilitate access, the remainder can be retained.

There are no known highways or access constraints to the site's development.

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

e) Yes, it is considered that the number of dwellings proposed is realistic and deliverable, and given the density of development within the village, the indicative housing number set within the Revised LDP is appropriate.

f) The site is allocated for 25 dwellings. It is anticipated that these will be delivered over a two year period 2026-2028. Further information will be provided at the hearing session.

g) No. The site 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 forms an important allocation in a

sustainable location that will contribute towards the housing figure proposed in settlement cluster 2.