CARMARTHENSHIRE REVISED LOCAL DEVELOPMENT PLAN (2018-2033) EXAMINATION

SCHEDULE OF MATTERS, ISSUES AND QUESTIONS

Matter 9: Prosperous People and Places – Site Allocations (Cluster 3 – Ammanford including Betws and Penybanc)

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

Allocated Sites	PrC3/h4 - Tirychen Farm PrC3/h6 - Land Adjoining Maes Ifan, Maesquarre Road PrC3/h19 - Land off Llys y Nant PrC3/h22 - Adjacent to Pany y Blodau PrC3/h33 – Llys Dolgader PrC3/h36 - Betws Colliery PrC3/h37 - Clos Felingoed PrC3/E1 – Cross Hands East PrC3/E2 - Cross Hands West Food Park PrC3/E2 (i) – Land east of Calsonic PrC3/E2(ii) – Land west of Gestamp Tallent PrC3/E2(iii) – Land at Heol Aur
	PrC3/E2 (i) – Land east of Calsonic
	PrC3/E3(i) - Heol Stanllyd (West) PrC3/MU1 - Emlyn Brickworks

- 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 in Cluster 3 can be found in submission document CSD106 (<u>site-allocation-assessment-cluster-3-complete.pdf</u> (<u>gov.wales</u>)). Additional information is provided in Appendix 1 of the Infrastructure Assessment Topic Paper CSD78 in respect of Key Sites (<u>infrastructure-assessment-update-topic-paper-eng.pdf (gov.wales</u>)).

PrC3/h4 - Tirychen Farm

- a) Greenfield site previously grazed comprising grassland with trees and scrub in parts
- b) Residential
- c) The has previously been granted outline consent for 289 dwellings with means of access, layout and scale approved. An outline permission was granted on 8 October 2019 as a renewal through a S73 application. A further S73 application was submitted in September 2023 to extend the lifetime of the consent (please refer to submission document CSD177 for an overview of the site's planning status). A number of constraints have been addressed through previous permissions and the current pending application. However, issues relating to ecology and drainage are yet to be fully resolved.

<u>Ecology</u>: The site lies adjacent to ancient woodland and the previously grazed site has regenerated in part to comprise wooded areas which provide connectivity to the wider landscape. The site also comprises areas of scrub and grassland. The pending application has therefore identified that the proposed development would need to give careful consideration to the potential loss of woodland and to the species which may be affected by the proposed development. Additional information and biodiversity enhancement has been proposed by the applicant to address ecological concerns (these are provided through a Biodiversity Enhancement Scheme and Woodland Management Plan submitted in support of application PL/06556 and are in addition to those surveys and reports referenced in CSD177).

The applicant is currently reviewing the scheme's layout and housing numbers with a view of making minor amendments and a reduction in dwelling numbers to retain larger undeveloped areas, in effect reducing the amount of woodland lost. <u>Drainage</u>: A second planning application is anticipated to address the need to provide suitable drainage to accommodate the development through the provision of attenuation ponds to the east of the application site.

- d) Viability has previously been considered as part of the planning applications previously granted. Additionally, 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 Landowner has reached an agreement with a housing association to sell the land upon granting of the pending planning application, should it be permitted. As noted above, discussions are ongoing relating to the ecological matters relating to the proposed development which will likely result in a reduction in housing numbers. The amendments may have the potential to affect the site's profitability, however, it is considered that the site will remain deliverable given that the Landowner has expressed that any financial impact upon the site will be absorbed by an adjusted land value / sale price.
- e) It should be noted that the most recent permission for the site was for the development of 289 dwellings (E/38686). This has been revised to 281 dwellings under the s73 application currently pending (PL/06556) and as noted above a further amendment to the scheme will likely result in a lower number. However, the site is proposed to be allocated in the revised LDP for 150. The reduced number is considered a more realistic figure to be delivered within the lifetime of the plan. The reduced figure would provide more flexibility to locate development in a manner which reduces the risks posed to protected species, allowing more woodland to be retained and providing opportunities to provide mitigation within the site's boundary.
- f) A Statement of Common Ground (SOCG) has been agreed between the landowner and the Council (submission document CSD177). Timescales for delivering the site are set out within this document and are considered to be

realistic and achievable. The landowner has agreed a sale to a housing association upon granting of the pending permission.

g) No, whilst the number of dwellings on the site is large and contributes to the overall housing allocation within the Ammanford / Cross Hands 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 3.

PrC3/h6 - Land Adjoining Maes Ifan, Maesquarre Road

- a) Agricultural land for grazing
- b) Residential
- **c)** No significant constraints have been identified. Issues that may need addressing at the planning application stage include:

<u>Ecology</u>: Survey may be required to establish the presence of reptiles and any mitigation required; Badgers may be using the site given the proximity of woodland and mitigation may be required; Root protection areas will likely be required for mature trees and hedgerows safeguarded; It is likely a Pollution Prevention Method Statement will be needed with a planning application given that there are watercourses near the site which feed into the Carmarthen Bay and Estuaries SAC.

<u>Amenity</u> - The site's topography slopes in a southerly direction and therefore the site's design, layout and landscaping will need to consider the impact upon the neighbouring properties.

The proposed allocation will be delivered as a continuation of the adjoining residential development at Maes Ifan. The landowner has provided a site layout as part of their submission which proposes that access is achieved through Maes Ifan. This road was designed to accommodate a further 30 dwellings. The candidate site submission presented by the owner considered issues such as flooding and hydrology, highways and access, ecology, access to services and facilities, mining activity and potential contamination.

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 landowner submitted additional viability information within their Supporting Statement during the consultation on the Second deposit revised LDP (April 2023), which further supports its viability.

- e) Yes, it is considered that the number of dwellings proposed (18 dwellings) is realistic and deliverable. The density on the site is reflective of the surrounding area and takes account of the space required for the existing attenuation basin located on the site and the need for landscaping and safeguarding of trees and hedgerows. However, the representation made in response to the Second Deposit revised LDP consultation included two potential site layouts one for 19 and the other for 28 dwellings. They demonstrate that the site could potentially be delivered at a higher density, although it is possible that the higher figure may present challenges insofar as retaining sufficient buffers to safeguard trees and hedgerow could be difficult as well as incorporating suitable landscape to avoid harmful impact upon the amenity of neighbouring properties through overlooking.
- f) The site is allocated for 18 dwellings. It is anticipated that these will be delivered at a rate of 6 in 2027/28; 6 in 2028/29; and, 6 in 2029/30 as set out within the LDP's trajectory. However, it should be noted that the landowner suggests that the site would be completed during 2027/28 and 2028/29.
- 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 Principal Centre, the site forms an important allocation that will contribute towards the housing figure proposed in settlement cluster 3.

PrC3/h19 - Land off Llys y Nant

- a) Residential with 2 plots under construction but formerly agricultural land for grazing
- b) Residential
- c) The main issue affecting this site is flooding. The site falls partly within the C2 floodzone as identified in the TAN15 Development Advice Maps and partially in flood zone 2 for flooding from rivers in the FMfP due to flood risk from the River Marlais, which flows to the west of the site. The Site is not within a Defended Zone.
- **d)** The site is largely built with a further 2 plots under construction. The issues presented have therefore not affected the site's delivery and viability.
- **e)** Yes, it is considered that the number of dwellings proposed is realistic and deliverable. The density on the site is reflective of the surrounding area.
- f) The site is allocated for 9 dwellings. 7 have been completed since the Plan's base date and it is anticipated that a further 2 will be completed in 2024/25.
- 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 Principal Centre, the site forms an important allocation that contributes towards the housing figure proposed in settlement cluster 3.

PrC3/h22 - Adjacent to Pant y Blodau

- a) Agricultural land for grazing
- b) Residential land
- c) No significant constraints have been identified. The site benefits from full planning permission (please see submission documents CSD184, CSD185 and CSD186 for additional information). Work has commenced on the road within the site. The landowner has acquired additional land adjoining the site with the intention of extending the proposed residential development resulting in approximately 12 additional dwellings. The parcel of land adjoins the site's eastern boundary north of 119 Heol Waterloo, effectively representing the road frontage between the allocated area of land and the road. The proposed under permission referenced E/29910. However, no planning application has been submitted nor has pre-application advice been sought to date.
- 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 (E/29910). A viability appraisal was submitted by the Landowner in September 2023, which is currently being considered by the Local Authority valuers. Should the Landowner proceed with a larger scheme incorporating the additional parcel of land to the east of the site then a new application will likely be submitted and the provision of affordable housing, as well as other planning obligations, considered as part of the application. However, the Landowner will proceed with the development under the agreed terms of the Section 106 Agreement unless a variation is agreed with the LPA or a new scheme proposed.

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) The number of residential units proposed mirror those set out in planning application E/29910; it is considered that both the numbers and trajectory set out in the Plan are realistic and deliverable over the plan period.
- f) The mechanisms and timescales for delivery of the site have been considered within planning application E/29910. It is anticipated that the 79 dwellings will be built in the following years: 20 in 2025/26; 20 in 2026/27; 20 in 2027/28; and, 19 in 2028/29.
- **g)** No, whilst the number of dwellings on the site is large and contributes to the overall housing allocation within Penygroes and the wider Ammanford / Cross Hands 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 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 settlement cluster 3.

PrC3/h33 – Llys Dolgader

- a) Residential but formerly comprised of previously developed land as part of a caravan park
- b) Residential
- c) The site falls within the NRW Flood Zone Rivers (zones 2 & 3) and Surface Water and Small Water Courses (zones 2 & 3), however, the site has been developed.
- **d)** Whilst there are constraints which affect the site, which are noted above, these have not affected the site's delivery.
- **e)** Yes, it has already been delivered and the density is reflective of the surrounding area.
- f) The site is allocated for 9 dwellings to reflect the completion of 6 dwellings in 2020/21 and 3 in 2021/22.
- 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 Principal Centre, the site forms an important allocation that contributes towards the housing figure proposed in settlement cluster 3.

PrC3/h36 - Betws Colliery

- a) The site is previously developed land which was formerly a colliery; the site is currently vacant.
- b) Residential
- c) No significant constraints have been identified. The site benefits from full planning permission (please see submission documents CSD180-183 for additional information). Work has commenced on the site with the access road from Ffordd y Glowyr in place.
- d) Any constraints, as well as the need to provide affordable housing, have been considered as part of the viability work associated with planning applications E/09584 and E/24742 and a Section 106 Agreement completed.
- e) The number of residential units proposed mirror those set out in planning application E/24742; it is considered that both the numbers and trajectory set out in the Plan are realistic and deliverable over the plan period.
- f) The mechanisms and timescales for delivery of the site have been considered within planning application E/24742 (and E/09584). It is anticipated that the 66 dwellings will be built in the following years: 22 in 2028/29; 22 in 2029/30; and, 22 in 2030/31.
- g) Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of several 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 important allocation that will contribute towards the housing figure proposed in settlement cluster 3.

PrC3/h37 - Clos Felingoed

- a) Residential which comprised of previously developed land as formerly used for engineering works.
- **b)** Residential.
- c) There are no known constraints, and the site has been delivered.
- d) The site comprises social rented homes delivered by a housing association. Viability was considered as part of the planning application and planning obligations agreed (permission ref. PL/02848). The site has been completed which demonstrates the site's deliverability and viability.
- **e)** Yes, it has already been delivered and the density is reflective of the surrounding area.
- f) The site is allocated for 24 dwellings which were completed in 2023/24.
- 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 Principal Centre, the site forms an important allocation that contributes towards the housing figure proposed in settlement cluster 3.

PrC3/MU1 - Emlyn Brickworks

- a) Previously developed land which was formerly used as brickworks.
- **b)** Primarily residential use with a small area for community facilities.
- c) Please see submission document CSD187 and Appendix 1 of CSD78 for additional information relating to constraints.

Ecology and land contamination have been considerations as part of the application for phase 2 on the site and consideration has been given to the impact of past mining activities in the area. This has included additional survey work being undertaken, additional mitigation agreed, and suitable conditions included within the planning permission. Whilst the permission relates only to a phase of development proposed for the wider allocation, it is a good indication of constraints affecting the wider site and how they may be addressed.

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.

d) The site has full permission for 70 dwellings (E/32720) identified as Phase 2 of the development by Emlyn Developments. An application is pending for a further 16 dwellings at the eastern part of the site (PL/07162). Issues relating to ecology have been considered and resolved as part of these applications. It is considered that the development of future phases of the allocated site could also suitably address any concerns relating to the site's ecological value. The landowner has provided a high-level viability appraisal taking into account the likely mitigation and contributions required which indicates that the development of the sites, not currently benefitting from planning permission, would be economically viable. Please

find attached the Summary sheet for the development viability appraisal provided (Appendix A).

- e) Yes, it is considered that the number of dwellings proposed (177 dwellings) is realistic and deliverable. Part of the site has permission, and this is reflected in the identified housing figure. The overall housing figure is reflective of the surrounding area and allows for the delivery of necessary infrastructure.
- f) It is anticipated that the 177 dwellings will be built in the following years: 15 in 2025/26; 20 in 2026/27; 20 in 2027/28; 27 in 2028/29; 30 in 2029/30; 25 in 2030/31; 25 in 231/32; and 15 in 2032-33.
- g) No, whilst the number of dwellings on the site is large and contributes to the overall housing allocation within the Ammanford / Cross Hands 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 3.

Financial V	/iability	Appraisal - Su	mma	ary	
Gross Development Value		Units (N°)			% GDV
Open Market Housing		72	£	18,401,550	90.1%
Affordable Housing	20.0%	18	£	2,021,127	9.9%
RESIDENTIAL GDV		90	£	20,422,677	
Commercial/Investment NDV			£	-	0.0%
TOTAL SALES REVENUE			£	20,422,677	
Other Revenue (Grant or Income)			£	-	
TOTAL DEVELOPMENT REVENUE		£	20,422,677	100.0%	
	NDA	£/ac			
Land (incl acquisition costs)	9.04	£207,084	£	1,976,303	9.7%
Survey & Planning Costs			£	-	0.0%
Community Infrastructure	£/unit	£5,102	£	459,218	2.2%
Physical Infrastructure					
Normal On-Site Works	£/unit	£3,500	£	315,000	1.5%
Abnormal Works/Costs	£/unit	£5,350	£	481,500	2.4%
Professional Fees		5.00%	£	39,825	0.2%
Housing Construction					
Build & External Costs	£/unit	£129,836	£	11,685,250	57.2%
Professional Fees		5.00%	£	584,262	2.9%
Commercial/Investment Construction					
Building Costs			£	-	0.0%
Professional Fees			£	-	0.0%
All Construction Contingency		5.00%	£	655,292	3.2%
Sale, Letting & Marketing Costs			£	472,535	2.3%
Finance Costs			£	298,549	1.5%
TOTAL DEVELOPMENT COST			£	16,967,735	
		Profit	£	3,454,942	16.9%
Surplus/ <mark>(Shortfall)</mark> in Profit				£12,732	0.37
against Benchmark/Target £3,442,211		made up of:			
on open mkt housing sales		£3,312,279		target return	18.00
on affordable ho	£129,932		target return	6.00	
on non-reside	ential NDV	£0		target return	15.00

Primary Data, KPI's and Sensitivity Testing £1,872,840 Total Site Value Net Developable Area 9.04 acres 3.66 hectares Site Value /ac and /ha £207,084 per net acre £511,705 per net ha Abnormal / **Strategic Site Costs** £53,241 per net acre £131,557 per net ha **Development Densities** 10.0 dwellings/acre Residential 24.6 dwellings/net ha 2,109.6 sqm/net hectare **Average Residential Values** £ psm £ psf N° % GIA sqm Open Market dwellings £255,577 £2,860 £266 72 6,433.00 Affordable - social rent £113,636 872.00 £1,564 £145 12 66.7% Affordable - intermediate £109,583 £1,581 £147 6 33.3% 416.00 Sensitivity Testing Facility Open Market Housing (open market sales only) 100.00% 100.00% Affordable Housing (affordable housing values) Commercial NDV 100.00% (all non-residential values) Housing Construction 100.00% (housebuilding & normal external costs) Commercial/Investment 100.00% (non-residential construction costs) Physical Infrastructure 100.00% (abnormal & other normal site costs) Community Infrastructure 100.00% (CIL and/or s.106 obligations except AH) Percentage Profit on GDV 16.92% (blended margin) Percentage Profit on Cost 20.36% Peak Borrowing £2,432,931 Interest Cover 167 months Peak Equity Requirement £1,713,425 42.7% IRR (before Finance Costs) Total Equity & borrowing £4,146,356 Profit on Capital Employed 83.3%

Version:	1
LPA: Carma	rthenshire County Council, Site Ref: PrC3/MU1
Site Name:	Emlyn Brickworks

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07/08/2024

PrC3/E1 – Cross Hands East

- a) Committed employment site: Plateaus and infrastructure have been built to facilitate development, with several of the plots already constructed, and the remainder being ready for implementation.
- b) Employment B1 and B8 use classes. A detailed site proforma has been submitted as part of the evidence base (see submission document CSD106), and a Statement of Evidence has been produced in support (see submission document CSD202).
- c) The site has numerous planning permissions; constraints have been addressed as part of the application process by way of necessary investigative work, and subsequent planning conditions. Reference is made to the Statement of Evidence (submission document CSD202).

'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 surface water and small water courses (zone 2&3). Consequently, any future planning applications in relation of those parts of the site affected, will be required to have regard to the FMfP and be supported by appropriate evidence including an FCA.'

It is noted however that the proposed site development is for a less vulnerable use as defined with the current TAN15 (2004).

d) The reference to affordable housing is not applicable to this employment allocation, however in terms of viability, details of the considerable investment, delivery mechanisms (including public funding and infrastructure development) and progress into developing the site is set out in the Statement of Evidence.

- e) Not applicable to this employment allocation.
- f) The site has planning permission and is managed by the Cross Hands Joint Venture. Detailed information on delivery to date and future mechanisms and expectations are set out in the Statement of Evidence. NB section 5 of the statement mentions a Local Development Order (LDO) in relation to this site. Work on the LDO has since ceased, however, information acquired during preparatory work (in respect of such work on ecological & highways assessments, and design guidance) will be made available to support future planning applications at the site.
- g) Yes. The Two County Economic Study for Pembrokeshire and Carmarthenshire identifies the Cross Hands East allocation as a regionally important strategic site. The site is managed by the Cross Hands Joint Venture, a partnership between the County Council and the Welsh Government and considerable investment has gone into the site to create the 17 development plots. The site makes a valuable contribution to the County's employment portfolio and is crucial to the soundness of the Plan.

PrC3/E2 - Cross Hands West Food Park (comprising the following 3 parts):

PrC3/E2 (i) – Land west of Castell Howell

- a) Northern part built since the start date of the Plan period. Remaining element is vacant land, adjacent to existing food park operations and will be conducive to future uses associated with these operations.
- **b)** Employment B use classes. A detailed site proforma has been submitted as part of the evidence base (see submission document CSD106).
- **c)** No significant constraints have been identified. Considerations that may need addressing at the planning application stage include:
 - Ecological matters Grassland surveys required. Encroachment on the boundary woodland should be protected through adequate buffers.
 Dormouse survey will be required.
 - 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 a very small area of the site as falling within surface water and small water courses (zone 2&3). Consequently, any future planning applications in relation of those parts of the site affected, will be required to have regard to the FMfP and be supported by appropriate evidence including an FCA.
- d) The reference to affordable housing is not applicable to this employment allocation, however in terms of viability, planning permission S/27508 which saw the development of a food processing factory, by the owners Castell Howell, indicates options for future expansion on the remaining land. Further details in respect of the owner's future plans are detailed in f) below.

- e) Not applicable to this employment allocation.
- f) Castell Howell's submission documents for their Planning Permission for the lorry maintenance depot and car parking area (PL/05778 and PL/07486) includes a masterplan (ref 1352:PL0:03 A) which shows an extension to Celtica which would occupy the remaining land.
- g) The site is located within the existing built form in an area which is characterised by employment uses in the strategic employment hub of Cross Hands. The Two County Economic Study for Carmarthenshire and Pembrokeshire - identifies the Cross Hands employment allocations collectively as a Regionally Important Strategic location. The site's size and scale allows the opportunity for development associated with traditional B class employment uses, and there is road infrastructure in place which makes the site immediately available for development. The site is covered by an existing planning permission for food processing development which has already been built adjacent.

Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of employment allocations that cumulatively contribute towards delivery of employment land within the Revised LDP. Given its location within a Tier 1 settlement, the site forms an important allocation in a sustainable location (within easy access of the A48) that will contribute towards the employment portfolio proposed in settlement cluster 3.

PrC3/E2(ii) – Land south of Heol Parc Mawr

- a) The site is relatively level plateau of vacant land, lying immediately adjacent to, and accessible from the existing road layout currently serving the adjacent existing employment land and businesses to the north and east.
- b) Employment B use classes. The site is therefore situated in a logical position for the further expansion of employment uses in an area already characterised by economic activity. A detailed site proforma has been submitted as part of the evidence base (see submission document CSD106),
- **c)** No significant constraints have been identified. Considerations that may need addressing at the planning application stage include:
 - Ecology: trees on the site boundary, and there are marsh fritillary butterfly and dormice records in the area. Consequently, subsequent planning applications will need to be accompanied by dormouse surveys, and boundary trees will need protecting through buffers.
- d) The reference to affordable housing is not applicable to this employment allocation, however in terms of viability, the land is owned by Carmarthenshire County Council as part of the Cross Hands Joint Venture. It is the intention to sell the land to the adjacent occupier.
- e) Not applicable.
- f) Initial assessments have been made and the prospective purchaser is preparing a planning application for submission. The Landowner has already invested in undertaking necessary assessments and to employ a consultancy to undertake Pre-Application Consultation (PAC), prepare a planning application and SUDS application. Whilst not part of planning permission PL/05778, the prospective purchaser has indicated their future intentions for

expansion on this site through a masterplan that was submitted as part of the planning application.

g) The site is located within the existing built form in an area which is characterised by employment uses in the strategic employment hub of Cross Hands. The Two County Economic Study for Carmarthenshire and Pembrokeshire - identifies the Cross Hands employment allocations collectively as a Regionally Important Strategic location. The site's size and scale allows the opportunity for development associated with traditional B class employment uses, and there is road infrastructure in place which makes the site immediately available for development. The site is important to the Council's economic delivery plans and the potential removal of this allocation would hamper the future development options associated with the area.

Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of employment allocations that cumulatively contribute towards delivery of employment land within the Revised LDP. Given its location within a Tier 1 settlement, the site forms an important allocation in a sustainable location (within easy access of the A48) that will contribute towards the employment portfolio proposed in settlement cluster 3.

PrC3/E2(iii) - Land north of Dunbia

- a) A relatively flat area of vacant land west of Dunbia.
- b) B class employment uses, in keeping with the adjacent uses. The site is owned by Dunbia and provides an additional land opportunity for future expansion by Dunbia or as a separate development site should it no longer be required by the former.
- **c)** No significant constraints have been identified. Considerations that may need addressing at the planning application stage include:
 - Ecology: grassland and trees on the site, and there are marsh fritillary butterfly and dormice records in the area. Consequently, subsequent planning applications will need to be accompanied by grassland and dormouse surveys.
 - 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 a very small area of the site as falling within surface water and small water courses (zone 2&3). Consequently, any future planning applications in relation of those parts of the site affected, will be required to have regard to the FMfP and be supported by appropriate evidence including an FCA.
- d) The reference to affordable housing is not applicable to this employment allocation, however in terms of viability, there may be potential for Property Development Funding in the future i.e. within the plan period for the site's development however it would be dependent on who would be taking the development forward.
- e) Not applicable to this employment allocation.

- f) Dunbia have had plans to use the site for their operations. In the event that the land is no longer required the Joint Venture (comprising the County Council and the Welsh Government) will have an opportunity to buy back and utilise for employment uses.
- g) The site is located within the existing built form in an area which is characterised by employment uses in the strategic employment hub of Cross Hands. The Two County Economic Study for Carmarthenshire and Pembrokeshire - identifies the Cross Hands employment allocations collectively as a Regionally Important Strategic location. The site's size and scale allows the opportunity for development associated with traditional B class employment uses, and there is road infrastructure in place which makes the site immediately available for development. The site is important to the Council's economic delivery plans and the potential removal of this allocation would hamper the future development options associated with the area.

Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of employment allocations that cumulatively contribute towards delivery of employment land within the Revised LDP. Given its location within a Tier 1 settlement, the site forms an important allocation in a sustainable location (within easy access of the A48) that will contribute towards the employment portfolio proposed in settlement cluster 3.

PrC3/E3(i) - Heol Stanllyd (West)

- a) Vacant land, one of three plots making up the overall allocation PrC3/E3. The site is surrounded by existing employment and retail uses to the north and east and has road infrastructure in place which makes it immediately available for development.
- **b)** B class employment uses.
- **c)** No significant constraints have been identified. Considerations that may need addressing at the planning application stage include:
 - Public bridleway to the south east of the site (in between this element and PrC3/E3(ii)). This is not a significant obstacle to development. Any impact on public footpaths and/or bridle ways will be addressed as part of a planning application.
 - Ecology: grassland and trees on the site, and there are marsh fritillary butterfly and dormice records in the area. Consequently, subsequent planning applications will need to be accompanied by grassland and dormouse surveys.
 - 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 areas of the site as falling within surface water and small water courses (zone 2&3). Consequently, any future planning applications in relation of those parts of the site affected, will be required to have regard to the FMfP and be supported by appropriate evidence including an FCA.
- **d)** The reference to affordable housing is not applicable to this employment allocation, however in terms of viability, the site is strategically located within

an area characterised by employment operations and provides opportunities for development of employment uses from either new operations or existing companies on the Cross Hands Site seeking expansion land. In the latter case, development by an expanding business could result in vacation of a smaller site suitable for other SMEs to occupy.

- e) Not applicable.
- **f)** Currently the site is partially used for storage. There may be potential for its future employment use through lease arrangements.
- g) The Two County Economic Study for Carmarthenshire and Pembrokeshire identifies the Cross Hands employment allocations collectively as a Regionally Important Strategic location. The site is located within the existing built form in an area which is characterised by employment uses in the strategic employment hub of Cross Hands. Its size and scale allows the opportunity for development associated with traditional B class employment uses, and there is road infrastructure in place which makes the site immediately available for development. The site is important to the Council's economic delivery plans and the potential removal of this allocation would hamper the future development options associated with the area.

Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of employment allocations that cumulatively contribute towards delivery of employment land within the Revised LDP. Given its location within a Tier 1 settlement, the site forms an important allocation in a sustainable location (within easy access of the A48) that will contribute towards the employment portfolio proposed in settlement cluster 3.