

CARMARTHENSHIRE
REVISED LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION

Carmarthenshire County Council's Statement
for

Hearing Session 13 - Wednesday 17 September 2025 10:00 – 17:00

Virtual Hearing

Matter 13: Prosperous People and Places – Additional Sites (Clusters 1 and 2)

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

Additional Sites	<ul style="list-style-type: none">• PrC1/(iv) - Land off Trevaughan Road, Carmarthen• PrC2/(ii) – Land at Cefncaeau, Llanelli• PrC2/(v) – Land off Heol y Mynydd, Bryn• PrC2/(iii) – Land at Pendderi Road, Bryn• SeC3/(ii) – Land at Monksford Street, Kidwelly• SeC6/(ii) – Fforest Garage, Fforest• SeC6/(iii) – Land at Fforest Road, Hendy• SeC7/(i) – Land at Pontarddulais Road, Llangennech
------------------	--

Questions

- 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 and evidence report in relation to the additional sites have already been presented. These can be found on the Council's website.

PrC1/(iv)- Land off Trevaughan Road, Carmarthen

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

Agricultural land

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

Residential land (30 dwellings)

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

No significant constraints have been identified. Issues that may need addressing at the planning application stage include:

- Highways – Any access junction shall be considered in line with Carmarthenshire County Council standards and shall be situated at least 33 metres (centreline to centreline) away from the Derwen Fechan junction (opposite junction spacing).
- Ecological considerations – the site features improved grassland, bare ground, scrub, hedge and trees. There will be a requirement to retain hedgerows, trees and provide buffers.
- Flooding – Approximately 10% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3) and the implications of this will be considered when determining a planning application for the site.
- Agricultural land – 60 % of the site is identified as Grade 3a in the predicted agricultural land classification map. It is acknowledged that the ALC Map for Wales is a predictive mapping exercise. The site is located within a sustainable location identified as a primary centre within the RLDP and lies adjacent to existing built form to the east and south. Its development would result in a sustainable development and represent logical rounding off at this part of the town. The portion of land identified as grade 3a totals less than 1ha in area and, on balance it is considered that the site presents an opportunity for sustainable development at the edge of one of the County's largest settlements consistent with the strategy of the Plan and the settlement hierarchy.

d) In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?

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

viable for market-led developments to deliver affordable housing. Whilst no viability appraisal has been sought for this allocation, there are no known constraints that would make development of the site economically unviable. The 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 (see representation number 5202).

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

Yes, it is considered that the 30 dwellings proposed are realistic and deliverable over the plan period. The density on the site is reflective of the surrounding area and takes into account the need for landscaping and safeguarding of trees and hedgerows.

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

The site is allocated for 30 dwellings. It is anticipated that these will be delivered as follows: 15 in 2029-30; 15 in 2030-31. A letter has been provided by the landowner from a developer outlining their position regarding their intent to develop the site to support these timescales.

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

No, the site is a relatively small site located in a principal centre. Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Tier 1 settlement, the site forms an allocation in a sustainable location that will contribute towards the housing figure proposed in settlement Cluster 1.

PrC2/(ii) - Land at Cefncaeau, Llanelli

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

The site comprises two field parcels characterised by rough grassland and scrub, divided by overgrown hedges. The site is currently vacant and was formerly used for agricultural grazing.

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

Residential land

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

No significant constraints have been identified.

Outline planning permission was granted in December 2024 for the erection of new residential dwellings, vehicular access, open space and other associated infrastructure under planning reference PL/05187.

The permission proposes up to 91 dwellings, although the precise number of dwellings will be determined by a subsequent reserved matter application(s). A condition on the outline permission states that the number of dwellings on the site shall not exceed 91 units.

In considering other constraints, the outline planning permission sets out a number of planning conditions which will need to be considered as part of any reserved matters applications, however it is not considered that there is a fundamental impact on the development of the site.

Flooding – Approximately 50% falls within the Flood Zone 3 Rivers and Sea, however it is within the TAN15 Defended Zone, and approximately 10% falls within NRW Surface Water and Small Water Courses (zones 2 & 3).

d) In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?

The outline planning application was subject to a S106 agreement which was signed in conjunction with the outline planning permission. The development would include:

- 20% proportion of affordable housing,

- contributions towards education consistent with the terms set out within the Planning Obligations SPG, and,
- provide a financial contribution towards the provision of recreational facilities at Tir Einon Park.

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

Yes, it is considered that the 91 dwellings proposed are realistic and deliverable over the plan period. A Statement of Common Ground has been signed by the Council and the landowner in relation to the site with a commitment to bring the site forward in the short term.

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

Tata Steel has a number of retained Property Agents and formally instructed Harris Lamb to actively market the site as soon as the Outline Planning Permission was granted. Over 15 local and national housebuilders were originally approached. Tata Steel is now progressing discussions with a preferred developer. A formal proposal is expected to be received from this party imminently, with a view to then agreeing terms and moving to contract as soon as possible. The chosen developer would then be expected to submit a Reserved Matters application, with a view to commencing development within the short term.

The site is allocated for 91 dwellings. It is anticipated that these will be delivered as follows: 40 in 2026/27 and 51 in 2027/28. This is set out within the SoCG and a firm commitment has been considered within the landowner's representation as part of the additional sites' consultation.

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

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. The site has been identified as a possible addition to those included in the Second Deposit Revised LDP to address the Inspector's concerns in relation to the Plan's housing supply and need for a 10% flexibility to ensure that the rLDP meets the identified housing need.

PrC2/(v)- Land off Heol y Mynydd, Bryn

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

Agricultural Land

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

Residential Development

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

Mineral Safeguarding Area - Whilst the site is identified within a mineral safeguarding area (Category 1 - Sandstone and Igneous) the resource at this location is considered to be already largely sterilised as it is within 200m of sensitive development

Highways – There appears to be some 10m width (including verges) at the track between 29 & 31 Heol Y Mynydd, so in theory a compliant access could be achieved depending on land ownership and detailed design. The spur off Heol Y Mynydd serving the site is adopted by the LHA which would allow for compliant design and 'tie in'. Heol Caegar could be looked at as a secondary access but would likely need improving in terms of width and footway provision (western side), where land appears to be under control of CCC. However, Caegar would certainly serve as an excellent active travel access point

Ecology – The Council Ecologist has provided no objection to the development of the site. Any application will require ecological and tree surveys.

Flooding – There are no significant flood risk associated with the site. Less than 5% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)

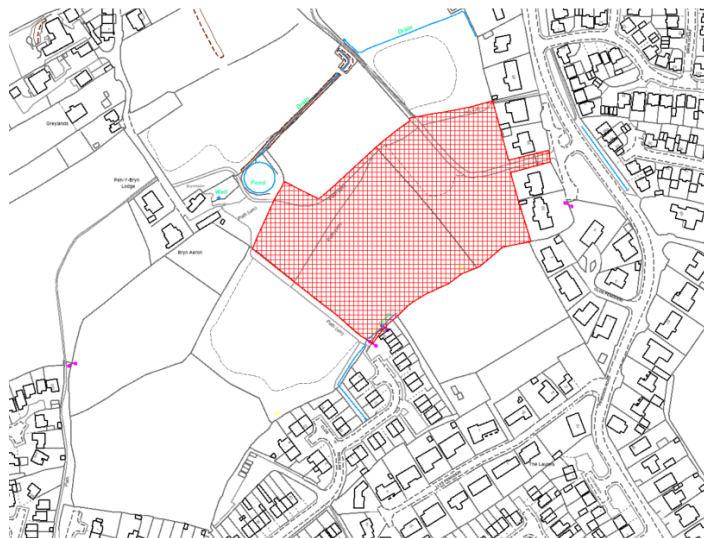
Best and Most Versatile Land – The site falls within category 3b, 4 and Urban of the Agricultural Land Classification. The development of the site provides no adverse impact on any higher grade agricultural land.

d) In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?

Yes - BDWH have previously submitted evidence to demonstrate the site as a whole is suitable, viable and deliverable for residential development. The summary sheet of the financial viability appraisal is appended to this Hearing Statement below.

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

The Council as part of its evidence base through the pro forma for the additional site consultation have clearly expressed its intention to potentially allocate a smaller portion of land than that consulted upon. Its inclusion as an additional site at that stage was to allow the potential to consider various parcels of land within the site, including the use of various access points. The Council's position would be to allocate the land highlighted within the map below. This parcel of land is 2.21 hectares and given the potential developable area, 80 dwellings would be a suitable indicative figure considering density policies within national policy and within the Revised LDP. The Council considers a period of 18 months to secure planning permission and to discharge conditions and then a development period of up to 24 months.



A statement of common ground has been signed between the Council, Boyer Planning and BDWH relating to the development of the site. There are a number of considerations which haven't been agreed with the Council, and this is reflected within the Boyer Planning representation on behalf of BDWH which was received as part of the additional site consultation. BDWH remain fully committed to the development opportunities presented by Land off Heol y Mynydd, Bryn, and seek the inclusion of 160 dwellings on the entirety of the site (5.43ha) that was consulted upon as part of the additional site consultation. BDWH are confident the site can be brought forward in its entirety to ensure

any future scheme is able to achieve the requisite number of homes in accordance with the proposed allocation.

In terms of timescales BDWH anticipate the following: i) 18 months to secure planning permission (inc discharging conditions); and ii) development period of 48-60 months.

In addition to the content set out within question (d) above, BDWH have presented a development viability appraisal to consider 160 dwellings and not the 80 dwellings proposed by the Council.

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

BDWH have secured an option for the site with the landowner and as a national house builder with a proven track record in the area can provide sufficient certainty the site will be delivered at a suitable point over the emerging plan period in line with CCC's proposed trajectory.

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

No, whilst the number of dwellings on the site is large and contributes to the overall housing allocation within the Llanelli 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 provision in settlement cluster 2.

PrC2/(iii)- Land at Pendderi Road, Bryn

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

Agricultural.

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

Residential development.

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

The site was subject to a Pre-Application consultation for 25 dwellings which took place in 2023 under pre-application number PRE/01761. Whilst several constraints were considered and identified, none were considered to be insurmountable, with the statutory consultees offering advice and providing a number of detailed design and standard conditions to be used as part of any further planning application. These include considerations on highways, tree protection areas, ecology, habitat management, sewage, the site's location in proximity to the Carmarthenshire Bay and Estuaries SAC, amongst others.

The summary provided by the planning officer to the pre-application consultation stated that the principle of housing development for circa 25 units on the site was supported, subject to further detailed requirements as highlighted above.

(d) In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?

Yes. There are no significant constraints identified which would impact viability, and it is considered that the sale value will reflect the need to provide a planning policy compliant amount of affordable housing.

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

Yes. The number of dwellings indicatively proposed is reflective of housing densities within the immediate locality.

There is a developer already on board. The number of proposed residential units are realistic and would be deliverable within the given time of the plan.

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

With support in principle through the Pre-Application to the Local Authority for some initial certainty relating to the site, a possible timescale of 21 months for completion of the site could be achieved to provide a more effective delivery of the site.

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

No. 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 1 settlement, the site forms an allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 2.

SeC3/(ii) - Land at Monksford Street, Kidwelly

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

Agricultural

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

Residential

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

The site was granted outline planning permission in August 2022 with the access arrangement along Monksford Street considered within the outline application. The outline planning permission sets out a number of planning conditions including:

- Detailed plans of the siting, design, external appearance, landscaping of the development, and detailed cross sections indicating finished floor and ridge levels compared to the highway, neighbouring properties and existing/proposed ground levels have been submitted to and been approved in writing by the Local Planning Authority.
- The protection of trees and hedgerow around the application site boundary for the duration of the construction period
- Providing details of landscaping works.
- Details of a sustainable surface water drainage scheme.
- Highway designs, including access and visibility, parking and turning facilities, Active Travel, footpaths.
- Detailing all necessary Pollution prevention measures for the construction stage.
- Details showing the path of diversion of the culverted part of the unnamed tributary of the Gwendraeth Fawr.

Further to the above, a Reserved Matters Application has been submitted on the land under planning reference number PL/09703. This was submitted on the 30th July 2025, and the proposal is for 76 dwellings.

d) In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?

The outline planning application was subject to a S106 agreement which was signed in conjunction with the outline planning permission. The development would include:

- No less than 20% of the total number of dwellings to be constructed on the red land as permitted by the permission shall be affordable dwellings.
- Commuted sum towards the provision of educational facilities in the local area.
- To pay the Council a commuted sum of £1,000 per dwelling towards the provision / enhancement of open space / play areas in the local areas.

In light of the submission of the Reserved Matters application, the proposal will need to provide 15.4 affordable homes within the scheme.

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

Yes. A Statement of Common Ground has been undertaken which provides information relating to the submission of a reserved matters application by the end of June 2025. The net developable area of the site can provide the indicative 70 dwellings set out within the additional site table. Reference is also drawn to the Reserved matters Application which identifies a site layout for 76 dwellings

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

It is considered that commencement of development will take place in early 2027 with 20 dwellings to be delivered per year until completion. The Timing and Phasing of this additional site can be found in Appendix 1 of the additional site report.

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

No, the site forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. The site has been identified as an appropriate residential allocation, in addition to those included in the Second Deposit Revised LDP, in order to address the Inspector's concerns in relation to the Plan's housing supply and need for a 10% flexibility, to ensure that the rLDP meets the identified housing need.

SeC6/(ii)- Fforest Garage, Fforest

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

The site was formerly a petrol filling station and has had a number of other uses over the years including commercial vehicle repairs, car sales and car wash. The upper section of the site is currently in use as a car wash, whilst commercial repairs/MOT's take place at the lower level to the rear. The site therefore represents brownfield previously developed land. The current use of the site is not compatible with the prevailing surrounding land uses which are residential in nature. This is reflected in the fact that the site is currently allocated for housing in the current Adopted LDP.

The site is located in a highly sustainable location to the western side of Hendy and to the north of Pontardulais and is therefore in close proximity to services and facilities, and can benefit from good active travel and public transport opportunities.

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

Residential land. The site is the subject of a pending full planning application by Mannor Homes to develop 8no. high quality residential dwellings (Ref: PL/07830). The application is not subject to any statutory or third-party consultee objections.

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

The site is not subject to any ecological or environmental designations. The pending planning application was accompanied by a significant amount of supporting reports and surveys including various ecology, trees and Green Infrastructure Statement/Landscape design. Such reports have informed scheme design. These reports have been considered in depth by both NRW and the Council's Ecologist. NRW has raised no objections in relation to protected sites or protected species and have agreed with the conclusions of the Appropriate Assessment undertaken by the Council's Ecologist. The Planning Ecologist response raise no objection subject to the imposition of conditions.

Whilst the site is located partly within the defined High Risk Development Area in association with historic coal mining legacy, the pending application was accompanied by a Coal Mining Risk Assessment. This has been considered by the Coal Authority who has raised no objection to the pending planning application following detailed consideration of the submitted report. It has therefore been demonstrated and accepted

that the application site can be developed in a safe manner and coal mining legacy does not pose a constraint in this respect.

The site is not within a mineral safeguarding zone. Notwithstanding the site is within a sensitive residential area in this respect.

There are no heritage or agricultural land quality constraints associated with the site. As aforementioned the site consists of previously developed land.

This site is not within an Air Quality Management Area or Noise Sensitive Area. The Council's Environmental Health Officers raised no objection to the pending application on air quality or noise matters.

Due to the historic and current use of the site, the pending planning application was accompanied by a Ground Investigation Report. This has been considered by both NRW and the Authority's Environmental Health Division both of whom raise no objection subject to conditions.

The site is not within a defined flood zone and therefore NRW and Local Authority Drainage Division have not raised any objection on flood risk grounds.

The pending planning application was accompanied by a Drainage Strategy. The Authority's Drainage Division has raised no objection, and this will be subject of separate SAB approval.

Access to the site can be gained directly off the A48 at Fforest Road with good visibility provision. As aforementioned the site is within close proximity to local facilities and services, with numerous opportunities for both active travel and sustainable travel. Adequate pedestrian infrastructure can be provided within the scheme layout. The site has an established commercial use with associated traffic generation. The pending application was accompanied by a Transport Statement. This has been considered by the Local Highway Authority who raise no objection subject to conditions.

The proposed residential end use is considered to be fully compatible with the prevailing surrounding land uses which are also residential in nature. Its development for residential purposes will remove a non-conforming use, result in visual enhancements and result in the remediation of a brownfield site. The layout can achieve

appropriate separation distances with existing residential dwellings to ensure that there are no adverse residential amenity impacts in terms of overlooking or overbearance. No neighbour or third party objections were raised in relation to the pending planning application.

There are no infrastructure or land ownership constraints to site delivery. Dwr Cymru/Welsh Water raised no objection to the pending application, confirming that there are no sewerage or water supply constraints. The site is not within an area affected by riverine SAC phosphate issues. The site is owned by Mannor Homes Ltd.

d) In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?

Mannor Homes Ltd are fully aware of the affordable housing policy requirements. As a company they are on site delivering other high-quality developments in Carmarthenshire inclusive of affordable housing.

As aforementioned, Mannor Homes Ltd have purchased and own the site, and have gone to significant expense to prepare and submit the pending full planning application, evidencing a clear intent on their behalf to deliver.

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

Yes. The submission of the pending full planning application for 8no. high quality dwellings by Mannor Homes Ltd shows a clear intent on their behalf to deliver a residential development on this site. Subject to the successful receipt of planning permission, and subsequent discharge of planning conditions, Mannor Homes Ltd will be looking to make a start on site towards the latter part of 2025 / early 2026.

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

Mannor Homes Ltd as both landowner and developer will be delivering the site themselves for sale. Subject to successfully receiving planning permission, and subsequently discharging conditions, Mannor Homes would be intending on commencing works on the development towards the latter part of 2025 / early 2026. Such works would initially involve demolition, site clearance and remediation with infrastructure and house building to follow. It would be expected that the whole of the development would be completed in 2027 delivering much needed high quality residential units early on in the new rLDP period.

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

No. The site forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. The site has been identified as an appropriate residential allocation in addition to those included in the Second Deposit Revised LDP in order to address the Inspector's concerns in relation to the Plan's housing supply and need for a 10% flexibility to ensure that the rLDP meets the identified housing need.

SeC6/(iii)- Land at Fforest Road, Hendy

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

The site is currently agricultural land situated immediately adjacent to the existing built form in this part of the settlement of Hendy.

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

It is the developer and landowners' intention that the site be developed for residential use along with supporting infrastructure such as Sustainable Drainage and Public Open Space.

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

Ecology - the following comments have been received from the Local Authority Ecologists:

No significant constraints have been identified. The site comprises semi-improved grassland, marshy looking grassland, trees, scrub, and is in proximity to a watercourse. In terms of a future planning application, a survey will be needed for the grassland and scrub and buffers will be required for the trees.

Highways – the following comments have been received from the local highways authority:

Access is considered suitable. No observations to the additional numbers/allocation. Should the allocation take the potential total of dwellings including the existing already built (Clos Benallt Fawr) to over 150 then considerations should be given to secondary/alternative access to the site i.e. there is potential for an access onto the A48, adjacent no.44 Fforest Road (subject to feasibility, design etc).

Minerals - High Specification Aggregate (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) In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?

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 (housing contribution of 4.2 on a development of 35 dwellings). 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) Are the number of residential units proposed realistic and deliverable over the plan period?

Yes, it is considered that the number of dwellings proposed are realistic and deliverable. The site owners are keen to progress with the development of the site and submitted a candidate site, followed by a representation during the Deposit period of the Revised Plan requesting that the site be allocated for residential use. The developer would look to achieve 35 dwellings + on the allocation to contribute to the housing numbers in the County Council Area.

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

The site is under option by a Developer who developed the residential scheme to the north. The landowners are keen to progress with a residential scheme on the land. It is anticipated that the 35 dwellings will be delivered in the following years: 15 in 2027/28, and 20 in 2028/29. However, the developer will look to maximise the dwelling numbers on the land which could result in over 35 dwellings in line with the Net Area Plan submitted.

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

No, but the site forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. The site has been identified as an appropriate residential allocation in addition to those included in the Second Deposit Revised LDP in order to address the Inspector's concerns in relation to the Plan's housing supply and need for at least a 10% flexibility to ensure that the rLDP meets the identified housing need.

SeC7/(i)- Land at Pontarddulais Road, Llangennech

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

Vacant grassland.

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

Residential.

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

No significant constraints have been identified. A Statement of Common Ground (SoCG) has been drawn up between the local authority and the landowner which details potential constraints (and how these are minimal and can be overcome), and information concerning viability and deliverability. In summary, matters in relation to mineral safeguarding, flood risk, ecology and highways have all been covered in the SoCG, but none of these pose any potential problems to development of the site. A small part of the site is identified as a development high risk area by the Coal Authority. In such cases, an investigation will need to be carried out as part of a detailed planning application and mitigation measures employed if any features are discovered on the site.

d) In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?

There are no known constraints that would make development of the site economically unviable. A detailed Development Viability Model (DVM) has been completed by the landowner and this has been assessed by the Council's appointed financial consultant. The forecast development profit shown in Appendix C of the Viability Appraisal indicates that the scheme can be expected to achieve the target margin for a development of this scale; and that it is viable for it to deliver a policy compliant scheme that includes 12 (i.e. 20%) affordable homes. It is also considered that the site value indicated is sufficient to encourage the landowner in this case to release the land for the proposed development. The summary sheet of the financial viability appraisal is appended to this Hearing Statement below.

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

It is anticipated that the dwellings should be delivered in the following years:

2026-27	2027-28	2028-29	2029-30
15	15	15	15

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

The landowners are in discussions with a number of developers who wish to develop the site following the adoption of the Revised LDP in which it is hoped the site will be included as a residential allocation.

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

No, the site forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. The site has been identified as an appropriate residential allocation, in addition to those included in the Second Deposit Revised LDP, in order to address the Inspector's concerns in relation to the Plan's housing supply and need for a 10% flexibility, to ensure that the rLDP meets the identified housing need.

Appendix 1 – Development Viability Appraisals

The Financial Viability Appraisal summaries for key sites are set out below, these are referred to in the Council's statement above.

Financial Viability Appraisal - Summary

Gross Development Value		Units (N°)			% GDV
Open Market Housing		120	£	33,935,000	87.7%
Affordable Housing	25.0%	40	£	4,778,382	12.3%
RESIDENTIAL GDV		160	£	38,713,382	
Commercial/Investment NDV			£	-	0.0%
TOTAL SALES REVENUE			£	38,713,382	
Other Revenue (Grant or Income)			£	-	
TOTAL DEVELOPMENT REVENUE			£	38,713,382	100.0%
		NDA	£/ac		
Land (incl acquisition costs)	9.88	£242,817	£	2,557,750	6.6%
Survey & Planning Costs			£	500,000	1.3%
Community Infrastructure	£/unit	£8,345	£	1,335,240	3.4%
Physical Infrastructure					
Normal On-Site Works	£/unit	£11,656	£	1,865,000	4.8%
Abnormal Works/Costs	£/unit	£6,521	£	1,043,400	2.7%
Professional Fees		7.44%	£	216,240	0.6%
Housing Construction					
Build & External Costs	£/unit	£125,091	£	20,014,488	51.7%
Professional Fees		6.00%	£	1,200,869	3.1%
Commercial/Investment Construction					
Build & External Costs			£	-	0.0%
Professional Fees			£	-	0.0%
All Construction Contingency		5.00%	£	1,217,000	3.1%
Sale, Letting & Marketing Costs			£	952,375	2.5%
Finance Costs			£	516,464	1.3%
TOTAL DEVELOPMENT COST			£	31,418,826	

Profit	£	7,294,556	18.8%
---------------	----------	------------------	--------------

Surplus/(Shortfall) in Profit		£207,613	2.93%
against Benchmark/Target	£7,086,943	made up of:	
on open mkt housing sales	£6,787,000	target return	20.00%
on affordable housing cost	£299,943	target return	6.00%
on non-residential NDV	£0	target return	15.00%

Primary Data, KPI's and Sensitivity Testing

Total Site Area (Net Developable)	9.88 acres	4.00 hectares
Total Site Value	£2,400,000	£242,817 / net acre £600,000 / net ha
Abnormal Site Costs	£1,043,400	£105,565 / net acre £260,850 / net ha

Development Densities

Residential	40.0 dwellings/net ha 3,451.9 sqm/net hectare	16.2 dwellings/acre 86.3 avg sqm/dwelling
--------------------	--	--

Average Residential Values

<u>Average Residential Values</u>		£ psf	£ psm	N°	%	Avg GIA	Total GIA m ²
Open Market dwellings	£282,792	£294	£3,164	120		89.39	10,726.80
Affordable - Social rent	£102,520	£142	£1,531	24	60.0%	66.95	1,606.80
Affordable - Int/other	£144,869	£146	£1,573	16	40.0%	92.13	1,474.00

Sensitivity Testing Facility

Open Market Housing	100.00%	(open market sales only)
Affordable Housing	100.00%	(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	18.84%	(blended margin)
Percentage Profit on Cost	23.22%	
Peak Borrowing	£4,464,599	Interest Cover 192 months
Peak Equity Requirement	£3,144,256	IRR (before Finance Costs) 41.2%
Total Equity & borrowing	£7,608,855	Profit on Capital Employed 95.9%

Site Name: Land off Heol-y-Mynydd, Bryn

LPA: Carmarthenshire County Council, Site Ref: PrC2/(v)

Version: Final for RLDP

Financial Viability Appraisal - Summary

Gross Development Value		Units (N°)			% GDV
Open Market Housing		48	£	14,840,000	89.9%
Affordable Housing	20.0%	12	£	1,659,330	10.1%
RESIDENTIAL GDV		60	£	16,499,330	
Commercial/Investment NDV			£	-	0.0%
TOTAL SALES REVENUE			£	16,499,330	
Other Revenue (Grant or Income)			£	-	
TOTAL DEVELOPMENT REVENUE			£	16,499,330	100.0%
		NDA	£/ac		
Land (incl acquisition costs)	3.95	£265,581	£	1,106,500	6.7%
Survey & Planning Costs			£	85,000	0.5%
Community Infrastructure	£/unit	£4,770	£	286,180	1.7%
Physical Infrastructure					
Normal On-Site Works	£/unit	£21,500	£	1,290,000	7.8%
Abnormal Works/Costs	£/unit		£	-	0.0%
Professional Fees		6.00%	£	77,400	0.5%
Housing Construction					
Build & External Costs	£/unit	£141,067	£	8,464,000	51.3%
Professional Fees		6.00%	£	507,840	3.1%
Commercial/Investment Construction					
Build & External Costs			£	-	0.0%
Professional Fees			£	-	0.0%
All Construction Contingency		5.00%	£	516,962	3.1%
Sale, Letting & Marketing Costs			£	187,400	1.1%
Finance Costs			£	895,564	5.4%
TOTAL DEVELOPMENT COST			£	13,416,846	

Profit	£	3,082,484	18.7%
---------------	----------	------------------	--------------

Surplus/(Shortfall) in Profit		£8,888	0.29%
against Benchmark/Target	£3,073,596	made up of:	
on open mkt housing sales	£2,968,000	target return	20.00%
on affordable housing cost	£105,596	target return	6.00%
on non-residential NDV	£0	target return	15.00%

Primary Data, KPI's and Sensitivity Testing

Total Site Area (Net Developable)	3.95 acres	1.60 hectares
Total Site Value	£1,050,000	£265,581 / net acre £656,250 / net ha
Abnormal Site Costs	£0 / net acre	£0 / net ha

Development Densities

Residential	37.5 dwellings/net ha 3,530.0 sqm/net hectare	15.2 dwellings/acre 94.1 avg sqm/dwelling
--------------------	--	--

Average Residential Values

Open Market dwellings	£309,167	£300	£3,229	48		95.75	4,596.00
Affordable - Social rent	£138,278	£147	£1,577	12	100.0%	87.67	1,052.00
Affordable - Int/other							

Sensitivity Testing Facility

Open Market Housing	100.00%	(open market sales only)
Affordable Housing	100.00%	(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	18.68%	(blended margin)
Percentage Profit on Cost	22.97%	
Peak Borrowing	£5,120,952	Interest Cover 71 months
Peak Equity Requirement	£3,531,731	IRR (before Finance Costs) 19.8%
Total Equity & borrowing	£8,652,683	Profit on Capital Employed 35.6%

Site Name: Land at Pontarddulais Road

LPA: Carmarthenshire County Council, Site Ref: Sec7/(i)

Version: Revised LDP final