

# **Carmarthenshire Revised Local Development Plan 2018 – 2033**

## **Report on the Findings of the Additional Sites Consultation Including the Publication of Supporting Evidence**



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## Chapter 1 - Introduction

The Carmarthenshire Revised Local Development Plan (rLDP) is currently the subject of an Examination with the Hearing Sessions having taken place in October and November 2024.

On 31st January 2025, the Inspectors who are conducting the Examination into the Plan outlined their preliminary findings in respect of the rLDP's proposed housing supply and noted that the flexibility in the housing supply should be increased from 2.5% (223 dwellings) to at least 10% flexibility (882 dwellings) to ensure that there was sufficient provision to meet the housing need. The Inspectors' findings can be found here: [inspectors-note-on-housing-january-2025-v2.docx](#) .

To address the requirement of increasing the flexibility allowance within the Plan, the Council undertook an exercise to identify potential additional land for new homes to be included within the rLDP. The exercise culminated in a 7-week consultation on 30 additional sites – with 16 identified as new housing allocations, whilst 14 were considered to be committed sites (those with planning permission, those under construction, and those completed).

The consultation began on the 27th March and finished on the 15th May 2025. A total of 50 representations were received, however in some cases the representations related to multiple sites and so have been sub-divided. Of those 50 representations, 21 have been identified as not duly made with the majority providing general comments, or those relating to the Plan's policies / strategy). Other 'not duly made' are from representors promoting their own sites for inclusion rather than commenting on the additional sites in question. Representations in respect of the ISA / HRA consultation are set out separately in Chapter 3 below.



## Chapter 2 – Report Structure and Overview

As part of the requirement set out by the Planning Inspectors to present the findings of the additional site consultation process, the following report has been developed. This identifies the Council's rationale in selecting these sites through a series of questions explored by the Inspectors at the examination, and to publish and address the representations received as part of the additional site consultation.

This report is supplemented by a representation document which sets out those individuals and organisation that have presented information and evidence as part of this process.

### Report Structure

Reference is made to the Additional Sites Consultation Document that was published for consultation, which covers all the additional sites put forward by the Council. This Report deals only with those sites on which a representation(s) was received, and is dealt with in the following way:

- Allocations and commitments are dealt with separately, with potential allocations being covered first, in order of the Clusters 1-6 as they appear in the Revised Plan.
- The Council addresses the merits of the sites in respect of the 7 questions set by the Inspectors for the previous Hearing Sessions, these are:
  - 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?**

- This is followed by a summary of the representations received and the council's response to each representation.
- Following the main body of the report (above), the Report includes the following appendices that supplement the evidence put forward on the individual additional sites:
  - Appendix 1 – Timing and Phasing of additional sites
  - Appendix 2 – Development Viability Appraisals
  - Appendix 3 – Statements of Common Ground
  - Appendix 4 – Ecology Note on Breakers' Yard, Gorslas – Additional site reference PrC3/(ix)

## Considerations and proposed amendments following the consultation.

Following the end of the consultation, the Council present the following considerations and recommendations to the Inspectors.

1. Removal of the additional site (PrC2/(i)) Land adjacent to 91 Maes yr Haf, Pwll following updated evidence. This would remove 8 dwellings from the additional housing land supply.
2. Amend the total dwelling figure from 6 dwellings to 7 dwellings on additional site SeC6/(i) – Land off Heol y Parc. This is to reflect the planning permission for 7 dwellings.
3. The base date for these additional sites is the 31<sup>st</sup> March 2024 to reflect the position presented at the examination. However 3 sites which were published for this consultation as commitments were granted planning permission following this base date.(31<sup>st</sup> March 2024) They include
  - a. Land at Cefncaeau – Granted 2<sup>nd</sup> December 2024 (91 dwellings)
  - b. Land adjacent to 93 and 94 Abergwili Road, Carmarthen - Granted 9<sup>th</sup> May 2024 (9 dwellings)
  - c. Land off Heol y Parc, Hendy Granted 29<sup>th</sup> August 2024 (7 dwellings)

The Council therefore provides an amended additional sites table with the total housing supply figure for the additional sites being:

Allocations	564 dwellings
Commitments	316 dwellings
<b>Total</b>	<b>880 dwellings</b>

The table below identifies 17 sites as allocations, 12 sites as commitments, whilst the site at 'Land adjacent to 91 Maes yr Haf Pwll' has been removed.

It should be noted that the 3 sites identified in point 3 above would move over to the commitments table following the update to the 2024/25 trajectory.

Site Ref	Name	Total Units	Affordable Housing Contribution
<b>Potential Allocation</b>			
<b>Cluster 1</b>			
<b>PrC1/(iii)</b>	Land adjacent to 93 & 94 Abergwili Road, Carmarthen, SA31 2HJ	<b>9</b>	<b>2.7</b>
<b>PrC1/(iv)</b>	Land off Trevaughan Road, Carmarthen	<b>30</b>	<b>3.6</b>
<b>Cluster 2</b>			
<b>PrC2/(ii)</b>	Land at Cefncaeau, Llanelli	<b>91</b>	<b>18.2</b>
<b>PrC2/(iii)</b>	Land at Pendderi Road, Bryn	<b>35</b>	<b>4.2</b>
<b>PrC2/(v)</b>	Land off Heol y Mynydd, Bryn	<b>80</b>	<b>16</b>
<b>SeC6/(ii)</b>	Fforest Garage, Fforest	<b>8</b>	<b>Commuted Sum Contribution</b>
<b>SeC6/(i)</b>	Land off Heol y Parc, Hendy	<b>7</b>	<b>Commuted Sum Contribution</b>
<b>SeC6/(iii)</b>	Land at Fforest Road	<b>35</b>	<b>4.2</b>

Site Ref	Name	Total Units	Affordable Housing Contribution
<b>SeC7/(i)</b>	Land at Pontarddulais Road	<b>60</b>	<b>12</b>
<b>Cluster 3</b>			
<b>PrC3/(i)</b>	Emlyn Brickworks, Penygroes	<b>50</b>	<b>6</b>
<b>PrC3/(ii)</b>	Adjacent to Pant-y-Blodau, Penygroes	<b>11</b>	<b>1.1</b>
<b>PrC3/(iv)</b>	Land adjoining Maes Ifan, Maesquarre Road	<b>6</b>	<b>1.08</b>
<b>PrC3/(v)</b>	Land off Parklands Road, Ammanford	<b>9</b>	<b>Commuted Sum Contribution</b>
<b>PrC3/(vii)</b>	Land off Dôl y Dderwen Myddynfych	<b>31</b>	<b>31</b>
<b>PrC3/(viii)</b>	Land r/o 108 - 114 Waterloo Road	<b>6</b>	<b>Commuted Sum Contribution</b>
<b>PrC3/(ix)</b>	Breakers Yard, Gorslas	<b>80</b>	<b>16</b>
<b>Cluster 6</b>			
<b>SuV59/(i)</b>	North East of Bancyfelin School, Bancyfelin	<b>16</b>	<b>16</b>
<b>Total Housing Allocation Figures</b>		<b>564</b>	<b>132.08</b>
<b>Potential Commitment</b>			
<b>Cluster 1</b>			
<b>PrC1/(i)</b>	Former Lidl, Priory Street, Carmarthen	<b>40</b>	<b>40</b>
<b>PrC1/(ii)</b>	Land south of Pant Glas, Carmarthen	<b>13</b>	<b>4</b>
<b>SeC1/(i)</b>	Black Horse, Meinciau	<b>30</b>	<b>0</b>
<b>SuV2/(i)</b>	Land at Maes y Meillion, Llanybri	<b>13</b>	<b>3.9</b>
<b>Cluster 2</b>			
<b>SeC3/(i)</b>	Land opposite Parc Pendre, Kidwelly	<b>16</b>	<b>16</b>
<b>SeC3/(ii)</b>	Land at Monksford Street, Kidwelly	<b>70</b>	<b>14</b>
<b>Cluster 3</b>			

Site Ref	Name	Total Units	Affordable Housing Contribution
<b>PrC3/(iii)</b>	Land at rear of 10-12 Norton Road, Penygroes	<b>6</b>	<b>0</b>
<b>SuV25/(i)</b>	Cysgod yr Eglwys, Llannon (Adj St Nons Church)	<b>34</b>	<b>4</b>
<b>PrC3/(vi)</b>	Land opposite Plough & Harrow, Ammanford	<b>9</b>	<b>Commuted Sum Contribution</b>
<b>Cluster 4</b>			
<b>SuV37/(i)</b>	Former Coedmor School, Cwmann	<b>21</b>	<b>20</b>
<b>Cluster 5</b>			
<b>SeC15/(i)</b>	Land at Cilycwm Road, Llandovery	<b>14</b>	<b>14</b>
<b>Cluster 6</b>			
<b>SeC19/(i)</b>	Land Adjacent to the Beeches, Whitland	<b>50</b>	<b>15</b>
<b>Total Commitments Figure</b>		<b>316</b>	<b>130.9</b>

## Chapter 3 - HRA and ISA Additional Site Addendums

Only one representation was received in response to the consultation on the Integrated Sustainability Appraisal (ISA) and Habitats Regulations Assessment (HRA) Additional Sites Addendums (March 2025). It follows that Natural Resources Wales (NRW) reviewed the additional sites proposed for inclusion in the 2nd Deposit Revised Local Development Plan (rLDP) and considered them in relation to environmental constraints and potential impacts on the National Site Network. NRW's response to each site is considered within Chapter 4 with the Council providing a response to their commentary.

NRW confirmed that they agreed with the conclusion of the HRA that the inclusion of these sites would have no adverse effect on the integrity of the National Site Network and had no further comments to make on either the ISA or HRA.

### **Council response**

The local authority remains satisfied with the soundness of the conclusion and the robustness of the assessment findings.

## Chapter 4 - Report on the Additional Sites (Allocations and Commitments)

## Potential Allocations

### Cluster 1

#### **PrC1/(iii) - Land adjacent to 93 & 94 Abergwili Road, Carmarthen, SA31 2HJ**

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

Pasture / Agricultural land

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

Residential land (9 dwellings)

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

Any constraints on the site have been overcome as planning permission was granted on the site in May 2024 (PL/05745) for residential development, showing and indicative plan of 9 dwellings.

Flooding – Approximately 15% falls within Flood Zone 2 Rivers and Sea, and 5% within the NRW Surface Water and Small Water Courses (zones 2 & 3). The implications of this have been considered in the determination of the planning application for the site.

Agricultural land – 0.75ha of the site is identified as Grade 3a in the predicted agricultural land classification map. It is acknowledged that, by its very nature, 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?**

Yes, planning permission has been granted on the site and S106 agreement has been entered into for the provision of 30% of the dwellings to be constructed shall be affordable dwellings.

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

Yes, outline planning permission has been granted for the site and a further, reserved matters application is expected to be submitted in the coming months.

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

Contact has been made with the landowner's representative who has confirmed that construction on the site should commence in Spring 2026. The following completion rates are suggested: 3 in 2027-28; 3 in 2028-29; 3 in 2029-30.

**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.

**Representations Received**

Two representations have been received to the inclusion of the site as an additional site, and is summarised below:

## **Representation 42 – Natural Resources Wales**

Part of the site Flood Zone 2 rivers, FCA required. Speak to the LPA ecologist regarding species surveys, Welsh Water sewerage catchment.

**Council Response:** Comments noted, the site benefits from outline planning permission. Matters relating to flood risk and ecology have been considered in the determination of the planning application.

## **Representation 50 – Dewi Griffiths on behalf of Dŵr Cymru Welsh Water**

Comments provided include:

Water Supply: The site is committed, and we have made representations on planning application ref PL/05745.

Public sewerage: The site is committed, and we have made representations on planning application ref PL/05745.

Wastewater Treatment Works: This site is in the Parc y Splotts WwTW catchment area.

**Council Response:** Comments noted.

## **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.

### **Representations Received**

Three representations have been received to the inclusion of the site as an additional site, they are summarised below:

#### **Representation 40(a) – Boyer Planning on behalf of Barratt David Wilson Homes**

The respondent appreciates the site is considered to represent a proportionate extension to the defined urban area of Carmarthen, they are concerned that approximately 60% of the site is identified as Grade 3a agricultural land. For this reason, the identification of this site is brought into question given that good quality agricultural land would be lost, contrary to paragraph 3.59 of PPW12. The respondent suggests the inclusion of an alternative site – Land off Heol-y-Mynydd, Bryn which will not result in the loss of high-quality agricultural land.

**Council Response:** The presence of agricultural land has been discussed above and in the site assessment proforma. The conclusion is that 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.

#### **Representation 42 – Natural Resources Wales**

Welsh Water sewerage catchment, CSO North part of the site, FMfP flood zone 3 Rivers very northern part of the site, possible pollution pathway to Afon Tywi and Carmarthen Bay and Estuaries SAC. We recommend you seek the advice of your Local Authority's Planning Ecologist to determine if there is a reasonable likelihood of protected species being present within the site and to determine whether surveys are required.

**Council Response:** The part of the site that falls within Flood Zone 3 has been excluded from the allocation. The Local Authority ecologists have been consulted,

and their comments are presented in supporting information and are also set out above.

**Representation 50 – Dewi Griffiths on behalf of Dŵr Cymru Welsh Water**

Comments provided include:

Water Supply: A water supply can be provided for this site. The site is crossed by a 250mm diameter watermain.

Public sewerage: The public sewerage network can accept potential foul flows from this development site. We may request the inclusion of a suitable planning condition to retain control over the point of connection to the public sewer. The site is crossed by a 150mm diameter sewers, 100mm diameter pressurised rising main sewer, and 450mm diameter surface water sewer.

Wastewater Treatment Works: This site is in the Parc y Splotts WwTW catchment area. The WwTW has capacity to accept foul flows from the site.

***Council Response:*** Comments noted.

## Cluster 2

### PrC2/(ii) - Land at Cefncaeau, Llanelli

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

Agricultural land

**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?**

Following the granting of outline permission, the site is now being actively marketed, with over 15 local and national housebuilders approached. Bids are anticipated imminently, and a developer is expected to be in place by autumn this year (2025).

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 in Appendix 3 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.

### **Representations Received**

Seven representations have been received to the inclusion of the site as an additional site, they are summarised below:

### **Consultation Responses**

#### **Representation 6 – Mark Galbraith, Llanelli Rural Council**

The council objects to the inclusion of this site on the grounds it will have a detrimental impact on highway safety, additional traffic volume, and it will over stretch key public services such as school provision places, and local access to dental and GP services.

***Council Response:*** The site has been granted outline planning permission with the detail cited within the representation having been considered in the determination of the planning application.

#### **Representation 27 – Laura Greenman (HCR Law) on behalf of Leyton Harvard**

The representation reiterates and seconds the objection to the site presented by Evans Banks Planning.

***Council Response:*** Please refer to Representation no.34.

#### **Representation 34 – Evans Banks on behalf of their clients**

Evans Banks make a representation (objection) on behalf of their clients in relation to the potential of this additional site in Land at Cefncaeau. Their full representation can be found within the consultation report provided to the Inspectors. In summary, they have significant concerns with regards to the delivery of the site, particularly as it has been allocated for residential development for over 20 years. The objection includes concerns regarding the commitments of those with a legal interest in the land and to

be bound with the delivery of associated elements (affordable housing) and contributions that would result in the development of the site for residential development being policy compliant. The above recent stance is echoed by the fact that despite being allocated for residential purposes for over 20 years, the Additional Allocation has only been the subject of one planning application for residential development but continues to remain undeveloped. It is also noted that despite now benefiting from a form of outline planning consent, the land is not being actively marketed by the landowners (who are not housing developers). This further questions their commitment to see the land developed.

**Council Response:** The site has been granted outline permission with the agent and landowner having provided sufficient information relating to the site's status and proposed delivery.

#### **Representation 36 – Gareth Barton, Turley**

Tata Steel fully support the allocation of site PrC2/(ii) for housing development. The allocation of the site is consistent with representations submitted on behalf of Tata Steel at earlier stages of the RLDP process. To support this, we have set out key points regarding the site's status, deliverability and planning permission.

The covering letter supports the promotion of the additional site.

**Council Response:** Support welcomed

#### **Representation 42 – Louise Edwards on behalf of NRW**

91 units. NRW provided comments on application ref PL/05187 Flood Zone 3 (Sea) / Flood Zone 2+3 (Rivers) Flood Zone 3 (Sea) TAN 15 defended Zone. Site Specific FCA required.

Llanelli Coastal sewerage catchment / foul, contaminated land Preliminary Risk Assessment required. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment. HRA undertaken for the site.

**Council Response:** Comments Noted. The site has been granted outline planning permission, with planning conditions to be considered as part of any Reserved Matters.

### **Representation 43 – R, H & D Jones**

It is the view of the respondent that the Council has failed to provide a clear, evidence-based rationale for its decision to include only a limited number of sites within the Consultation on additional housing sites. This Consultation on additional housing sites is only a partial consultation as it does not offer respondents the opportunity to consider and comment on the full range of options that are available.

On the balance of probability not all the sites set out within the Consultation on additional housing sites will be deliverable within the “Plan Period” and therefore the Council should reconsider sites that have been allocated within previous LDPs

**Council Response:** The respondent makes no definitive objection to the additional site within this representation and seeks to object to the site assessment methodology and the omission of his own site at Cwmffrwd.

### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

This site is committed, and we have made representations on planning application ref PL/05187

**Council Response:** Comments Noted

## **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.

**Representations Received**

Four representations have been received to the inclusion of the site as an additional site, they are summarised below:

**Representation 7 – Mark Galbraith, Llanelli Rural Council**

The inclusion of the site will have a detrimental impact on highway safety, additional traffic volume, and access to local key public services including school places provision, and access to dental and GP services.

**Council Response:** The Council's Highways officer has commented as part of the consultation process citing the potential for an acceptable access arrangement, and no objection to the additional traffic volume from the development. The development of new additional land has been considered within the Revised LDP's evidence base, whilst planning contributions to enable development will be supported from the development of the site.

**Representation 31(a) – Arwel Evans (Lichfields)**

Whilst the residual part of the site has been developed this site remains undeveloped with no sign of a planning application. The Council's site assessment is vague in terms of evidence of delivery, simply saying that the landowner has been in contact to say that the site will be put on the market and that further evidence will be provided to the Council. We consider this insufficient evidence to warrant the retention of this allocation from the previous LDP

Such evidence has not been provided here so it is unclear why this site is to be retained as an allocation when there are other suitable and deliverable options available for development such as our client's site (Land at Talyclun, Llangennech, CA0881 / SR/086/075) which benefits from strong developer interest.

**Council Response:** Reference is drawn to the answers for question (d), (e) and (f) above which states that a developer is on board to deliver the site subject to the necessary planning permissions, whilst the Council is satisfied as to the current position in bringing the site forward for development.

**Representation 42 – Louise Edwards on behalf of NRW**

35 units, Welsh water sewerage catchment. We recommend you seek the advice of your Local Authority's Planning Ecologist to determine if there is a reasonable likelihood of protected species being present within the site and to determine whether surveys are required.

**Council Response:** Noted. The Council Ecologist has provided no objection to the development of the site. Any planning application will require further surveys, but not insurmountable to the development of the site.

**Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

A water supply can be provided for this site. The public sewerage network can accept potential foul flows from this development site. The site is crossed by a 180mm diameter foul sewer. This site is in the Llanelli Coastal WwTW catchment area. The WwTW has capacity to accept foul flows from the site.

***Council Response:*** Comments welcomed and noted.

## **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.

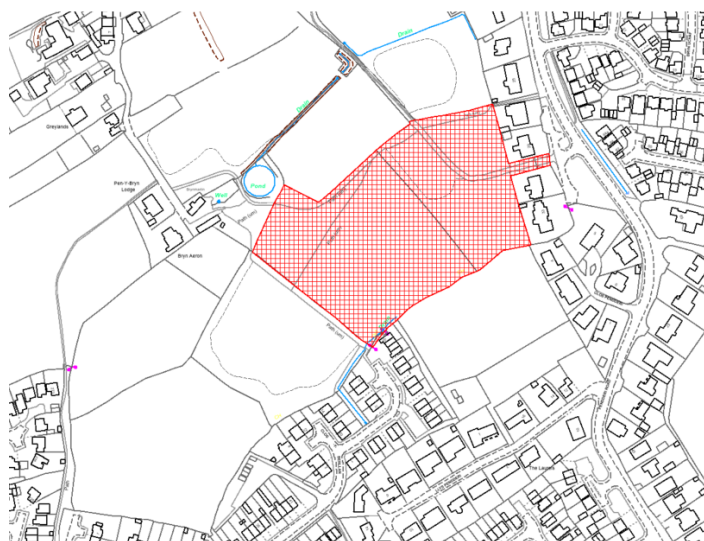


d) **In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?**

Yes - BDWH have previously submitted evidence to demonstrate the site as a whole is suitable, viable and deliverable for residential development. This is supplemented by additional information using Burrows-Hutchinson Development Viability Model (DVM) which is provided in Appendix 2.

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 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. The appraisal is presented in Appendix 3 below.

**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.

### **Representations Received**

Four representations have been received to the inclusion of the site as an additional site. They are summarised below:

#### **Representation 8 – Mark Galbraith, Llanelli Rural Council**

The inclusion of the site will have a detrimental impact on highway safety, additional traffic volume, and access to local key public services such as school places provision and dental and GP services.

***Council Response:*** The Council's response is set out above relating to the acceptability of the site for residential development.

#### **Representation 40 – Boyer Planning on behalf of Barratt David Wilson Homes**

Whilst BDWH wholly support the principle of the proposed allocation, it is noted that the Council has identified only the eastern portion of the site for 80 dwellings, however BDWH believe there is sufficient evidence to justify allocating the site in its entirety for up to 160 dwellings. This approach will provide greater certainty in ensuring the emerging RLDP is able to effectively meet local housing need over the emerging plan period and the proposed housing trajectory whilst also accounting for any potential slippage elsewhere.

The detailed response consider the following.

- Support the increase to 10% flexibility in principle, though continue to recommend this should be increased to at least 15% (equivalent to 1,323 dwellings) in order to ensure that the Plan is effective in meeting local housing need.
- Strongly support the identification of Land off Heol-y-Mynydd, Bryn as a proposed allocation PrC2/(v), however BDWH maintain that the site is more than able to

accommodate 160 dwellings rather than the 80 dwellings the site is currently proposed.

- The acceptability and deliverability of the site is supported in the Council's own assessment and supported by the technical documents provided throughout the Candidate Site process and at all stages of the RLDP.
- BDWH confirm the compliance with the RDLP and how the 160 dwellings will support the growth required in Carmarthenshire.
- BDWH address the comments relating to the perceived overdevelopment in Bryn and support the 160 dwellings rather than the proposed 80 dwellings.

**Council Response:** Commentary is provided within the detailed response to the potential allocation of the site above, with the support for the development of the site welcomed.

#### **Representation 42 – Louise Edwards on behalf of NRW**

80 units, speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment. Carmarthen Bay and Estuaries SAC approximately 1.4km away and 2km from the and Burry Inlet SPA

**Council Response:** Comments Noted. The LPA ecologist provided comment as part of the evidence leading into the additional site consultation. Welsh Water comments are provided below.

#### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water network and potential developers would be expected to fund investigations. The findings of the HMA would inform the extent of any necessary water infrastructure upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended).

The public sewerage network can accept potential foul flows from this development site.

This site is in the Llanelli Coastal WwTW catchment area. The WwTW has capacity to accept foul flows from the site.

***Council Response:*** Comments noted and welcomed.

## **SeC6/(i) - Land off Heol y Parc, Hendy**

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

Vacant land situated between two existing residential areas.

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

It is the landowner's intention that the site be developed for residential use.

### **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. The site has extant planning permission, and all matters have been considered within this, however it is worth noting the following:

Approximately 20% of the site falls within the NRW Surface Water and Small Water Courses (Zones 2 & 3).

In respect of ecological issues, any future application would be subject to survey. Buffers would be required for the trees.

63% of the site is identified as Grade 2 in the predicted agricultural land classification (ALC) map. It is acknowledged that, by its very nature, the ALC Map for Wales is a predictive mapping exercise. The site's development has been considered in the context of its setting within the urban form and its potential to deliver a sustainable development reflective of its surroundings. This is also consistent with the strategy of the Plan and the settlement hierarchy. The site benefits from outline planning consent

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

In terms of viability in relation to planning permission PL/04430, this is set out within the S.106 agreement which contains the financial contribution (commuted sum) to be made payable towards the provision of Affordable Housing within the

Community Area or if not applicable within the area of the County of Carmarthenshire.

**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 (7 dwellings) are realistic and deliverable. The site owners are keen to progress with the development of the site and gained outline planning permission in August 2024. The application provided a site layout plan illustrating how the site could be developed.

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

A submission for Approval of Reserved Matters is under preparation with a commencement on site scheduled for March 2026. It is anticipated that the 7 dwellings will be delivered in the following years: 4 in 2026/27 and 3 in 2027/28. The site is owned by a developer, and it is anticipated that they will develop the site.

**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.

**Representations Received**

Two representations have been received to the inclusion of the site as an additional site, they are summarised below:

**Representation 42 – NRW**

7 units. NRW provided comments on applications ref PL/04430 and PL/02016. The site is located adjacent to an area of semi natural ancient woodland along the M4

and dormice have been recorded 560m south of this site. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

**Officer Response:** NRW comments on applications PL/04430 and PL/02016 are noted. The Local Authority ecologists have been consulted, and their comments are presented in supporting information and are also set out above.

**Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

The respondent states that the site is committed and that they have commented on planning application PL/04430.

**Officer response:** Comments noted. No further action.



## **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 which concludes that the site's development in the manner proposed, subject to the imposition of

conditions, will not have an adverse impact upon the Carmarthen Bay and Estuaries SAC. 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.

### **Representations Received**

Five representations have been received to the inclusion of the site as an additional site, they are summarised below:

#### **Representation 27 – Laura Greenman (HCR Law) on behalf of Leyton Harvard**

The representation reiterates and seconds the objection to the site presented by Evans Banks Planning.

***Council Response:*** Please refer to Representation no.41.

#### **Representation 40(b) – Boyer Planning on behalf of Barratt David Wilson Homes**

Whilst BDWH broadly support the Council's intention to allocated residential development on this small parcel of brownfield land, it is important to recognise potential challenges these types of sites presents both in terms of viability and deliverability.

Research undertaken by Lichfield in June 2022 (Banking on Brownfield Research Paper) emphasises the fact that a key characteristic of brownfield development is the need for developers to deal with the legacy of existing or previous uses which often requires extensive remediation works at a significant cost to the project's overall viability. On that basis it is crucial that the RLDP is not over-reliant on the delivery of brownfield land and CCC acknowledges a need to identify a diverse portfolio of sites in order to ensure the emerging plan is soundly prepared.

***Council Response:*** The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. In respect of the respondent's reference to potential legacy issues at brownfield sites such as this, 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.

### **Representation 41 Evans Banks**

Aside of whether the current Planning permission is granted, there remains that the developer will have to undergo an extensive exercise of engaging with geotechnical specialists to ascertain the extent of contamination, and what forms of remediation will be necessary in order to stabilise the ground works at the site to allow for new residential properties, and also ensure that those new residents are not exposed to any pollution effects as a consequence of disturbing those below ground contaminants. The costs of such remediation works could be so substantial as to call into question the entire viability of the redevelopment proposals. Accordingly, the site would not be deliverable.

**Council Response:** The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. In respect of the respondent's reference to past contamination 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.

### **Representation 42 – NRW**

8 units NRW provided comments on application ref. PL/07830. Species surveys required.

**Council Response:** NRW comments on application PL/07830 are noted. NRW 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 which concludes that the site's development in the manner proposed, subject to the imposition of conditions.

### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

The respondent states that they have commented on current planning application PL/07830.

**Council response:** Comments noted. No further action.



## **SeC6/(iii)- Land at Fforest Road**

**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.

### **Representations Received**

Six representations have been received to the inclusion of the site as an additional site, they are summarised below:

#### **Representation 3 - Richard Jones**

The land was previously granted planning permission by local authority then rejected by Welsh Government. Following a physical inspection of the land it was found to be unsuitable for full development and only a partial build (which is now complete) was granted. There have been no changes or introduction to drainage to the land to remedy the base reason for the last rejection for persimmon. Furthermore, the additional housing will place increased pressure on Fforest road and traffic through Hendy past a primary school.

***Council Response:*** Disagree, the allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared, and any potential constraints have been considered.

#### **Representation 31(e) – Arwel Evans (Lichfields) on behalf of RSAI**

Whilst we note that the highway department considers that access is suitable, we comment that there are significant level changes here which may create issues. Fforest Road is itself on a significant incline rising to the west, but the fields that the site is on fall away suddenly. This should be further considered.

***Council Response:*** Comments noted. Changes in topographic levels at the site do not pose any particular constraints and will be considered as part of a detailed planning application.

### **Representation 37 – Kate Harrison, Persimmon Homes**

The respondent wishes to support the inclusion of the Land at Fforest Road (SeC6(iii)) for allocation. The site is inherently deliverable in the short term and is largely unconstrained. There are no restrictive covenants relating to the land, and Persimmon Homes has a legal interest in the land via an Option Agreement, with the Landowner being in agreement with the development proposals for the site. Persimmon Homes have recently completed a development adjacent to SeC6/(iii). Site details and constraint consideration were submitted in full as part of the candidate site submission however a breakdown has been provided (via an attachment) along with a high-level masterplan.

**Council Response:** Support welcomed.

### **Representation 42 - NRW**

35 units. We recommend you seek the advice of your Local Authority's Planning Ecologist to determine if there is a reasonable likelihood of protected species being present within the site and to determine whether surveys are required. Ordinary watercourse on site.

**Council Response:** The Local Authority ecologists have been consulted and their comments are presented in supporting information and are also set out above. The presence of the ordinary watercourse will be factored into any detailed development proposals.

### **Representation 44 – R, H & D Jones**

It is the view of the respondent that the Council has failed to provide a clear, evidence-based rationale for its decision to include only a limited number of sites within the Consultation on additional housing sites. This Consultation on additional

housing sites is only a partial consultation as it does not offer respondents the opportunity to consider and comment on the full range of options that are available.

On the balance of probability not all the sites set out within the Consultation on additional housing sites will be deliverable within the “Plan Period” and therefore the Council should reconsider sites that have been allocated within previous LDPs

**Council Response:** The respondent makes no definitive objection to the additional site within this representation and seeks to object to the site assessment methodology and its processes in the omission of his own site at Cwmffrwd.

#### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

A water supply can be provided for this site. The public sewerage network can accept potential foul flows from this development site. The site is crossed by 150mm & 225mm diameter foul sewers. The site is in the Llannant WwTW catchment area. There is limited capacity available at the WwTW and required improvements would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions.

**Council Response:** Comments noted. Required improvements to the WwTW would be considered as part of a detailed planning application and delivered through developer contributions if not delivered through the AMP.

## **SeC7/(i)- Land at Pontarddulais Road**

**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. Reference is made to the SoCG below (Appendix 3). 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 Financial Viability Appraisal and commentary from Burrows-Hutchinson Ltd can be found in Appendix 2 of this report

**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:

<b>2026-27</b>	<b>2027-28</b>	<b>2028-29</b>	<b>2029-30</b>
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.

**Representations Received**

Five representations have been received to the inclusion of the site as an additional site, they are summarised below:

**Representation 31(d) – Arwel Evans, Lichfields on behalf of RSAI**

Whilst we welcome additional growth in Llangennech it is unclear why this site has been chosen ahead of Land at Talyclun, Llangennech, CA0881 / SR/086/075. Our client's site has firm developer interest from a national housebuilder demonstrating

its ability to deliver in the short/medium term. It is unclear if this is the case for site SeC7/(i). Whilst site SeC7/(i) is not within a flood zone as designated by NRW Flood Map for Planning it is adjacent to a large area of Flood Zone 3 which is the flood plain for the Afon Morlais. The Strategic Flood Consequences Assessment previously highlighted this site as 'yellow' (medium risk) whilst Land at Talyclun, Llangennech, CA0881 / SR/086/075 was given a 'green' (low risk).

**Officer Response:** This consultation is specific to the additional sites put forward by the local authority and therefore we are unable to comment on any other sites put forward by respondents. In regard to site SeC7/(i), the allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared, and consideration has been given to the national flood map for planning.

#### **Representation 40(c) – Boyer Planning**

We understand there is some uncertainty regarding a small section of third party land. This land is located immediately adjacent to Pontardulais Road that could potentially affect a developers ability to gain access into the site. Given this issue could theoretically lead to a ransom position it brings into question the projected timescales for development to come forward and the overall deliverability of the site within the proposed plan period.

Furthermore, it's evident that the Councils highways department still have some reservations regarding the potential impact development in this location could have in exacerbating existing capacity issues along Pontardulais Road, the Talyclun Traffic Signals and the A4138 through to M4 Junction 48.

**Officer Response:** The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. In

regard to the respondent's reference to third party land posing potential difficulties, the site has sufficient access off Pontarddulais Road directly onto the proposed allocation, which is owned by the landowner/promoter of the site.

#### **Representation 42 – NRW**

60 units. Welsh water sewerage catchment. We recommend you seek the advice of your Local Authority's Planning Ecologist to determine if there is a reasonable likelihood of protected species being present within the site and to determine whether surveys are required.

**Officer Response:** Comments noted. The Local Authority ecologists have been consulted, and their comments are presented in supporting information and are also set out in the SoCG.

#### **Representation 45 – R, H & D Jones**

It is the view of the respondent that the Council has failed to provide a clear, evidence-based rationale for its decision to include only a limited number of sites within the Consultation on additional housing sites. This Consultation on additional housing sites is only a partial consultation as it does not offer respondents the opportunity to consider and comment on the full range of options that are available.

On the balance of probability not all the sites set out within the Consultation on additional housing sites will be deliverable within the "Plan Period" and therefore the Council should reconsider sites that have been allocated within previous LDPs, update the Site Assessment Table accordingly and include the viable allocated sites into the Revised Local Development Plan or undertake another consultation containing a complete list of options.

**Council Response:** The respondent makes no definitive objection to the additional site within this representation and seeks to object to the site assessment methodology and the omission of his own site at Cwmffrwd.



**Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

A water supply can be provided for this site. The public sewerage network can accept potential foul flows from this development site. The site is crossed by a 150mm diameter foul sewer. The site is in the Llangennech WwTW catchment area. The WwTW has capacity to accept foul flows from the site.

**Officer Response:** Comments noted. No further action.

## Cluster 3

### PrC3/(i)- Emlyn Brickworks, Penygroes

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

Previously developed land which was formerly used as brickworks.

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

Primarily residential use with a small area for community facilities.

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

The site is a previously developed site and has been included in the Second Deposit Revised LDP for mixed use purposes under site reference PrC3/MU1. Provision is made for the delivery of community focused development, along with 177 new homes. It is proposed to increase the housing provision on the site by 50 dwellings and allocate the site for community focused development and 227 dwellings to increase the housing supply within the Revised LDP in response to matters raised by the Inspector during the Revised LDP's Examination.

Part of the wider site, off Norton Road, has already been developed for nine homes. This was developed prior to the plan period and so does not form part of allocation PrC3/MU1 within the Revised LDP.

Full planning permission was granted on 26 July 2023 for 70 homes on Phase II (land between Norton Road and the Cross Hands Economic Link Road spur to Norton Road) (Council planning application reference number E/32720). This permission covers 2.2ha of the overall mixed use allocation in the Second Deposit Revised LDP.

A non-material amendment (registered 14/4/24) was granted in relation to permission E/32720 on 3/3/25 to allow for the phased discharge of conditions. An application under section 73 (registered 11/10/24) seeks permission for the

phased discharge of conditions and the approval of details required by some conditions. Submission of another application under section 73 for revisions to the approved house types and site layout, for the phased discharge of conditions and for approval of details required by some conditions is expected in summer / autumn 2025.

Allocated site PrC3/MU1 forms part of the wider Emlyn Brickworks site and the Landowner has promoted the wider site throughout the preparation of the revised LDP and during its Examination. During discussions at the public examination's hearing sessions, it was agreed that it would be appropriate to expand the allocation to include the wider site within the revised LDP resulting in an allocation measuring 18.7ha. As such, the Inspector issued The Local Planning Authority with an action point to enlarge the proposed site area. This amendment along with all other 'Matters Arising Changes' will be subject to public consultation. However, given that this consultation has not yet taken place the area of land outside of the allocation identified in the Second Deposit revised LDP lies outside the scope of this report.

No insurmountable constraints have been identified which would affect the site's delivery. However, the following issues may need considering at application stage. It should be noted that these have largely already been considered as part of the ongoing rLDP Examination but have been included below for completeness:

Mineral Safeguarding: 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.

Open Space: The evidence prepared in support of the proposed additional sites indicated that the site's development may create or exacerbate a shortfall in play space provision. This will need further consideration at planning application stage and the applicant may be required to provide play space as part of the

site's development or make a suitable contribution towards play space elsewhere in the locality in accordance with revised LDP Policy PSD8.

Peat: The Peatlands of Wales Maps have not identified that peatland underlie the site, however, BGS data indicates that peat may sit beneath a small part of the site. Whilst this has not presented issues in relation to granting permission for residential development and the delivery of the economic link road it may necessitate further investigation at the application stage for further development.

Ecology: Much of the site is Open Mosaic Habitat on previously developed land (section 7 priority habitat). The planning permission already granted for the site required a financial contribution for off-site management of habitat and it is considered that a similar approach could be adopted, if required, in relation to future phases of the site's development. The site falls within the Caeau Mynydd Mawr project area and as such will be required to contribute towards achieving the Caeau Mynydd Mawr SAC Conservation Objectives and to mitigate for the loss of potential supporting habitat and connectivity for the marsh fritillary butterfly in accordance with Policy NE4 of the revised LDP.

Highways: The Council's Highways Section has not raised an objection to the increase in dwelling numbers. They note that a Transport Assessment, would need to be produced in support of any forthcoming planning application. The Transport Assessment will need to demonstrate that the access proposals are appropriate from an overall traffic distribution perspective; to ensure the majority of the site traffic utilises the Cross Hands Economic Link Road to access and egress the surrounding road network as a means of reducing the impact of the development on local roads such as Waterloo Road and Gors Ddu Road.

Contamination and Coal Mining: The site will require a contaminated land risk assessment (and if necessary, a remediation strategy) to be submitted in support of any formal planning applications. As they all fall within the coal authority reporting area, the risk assessments will also have to risk assess mine

gases in accordance with CL:AIRE guidance document 'Good Practice for Risk Assessment for Coal Mine Gas Emissions; October 2021'.

Utilities (water supply): A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water network and potential developers would be expected to fund investigations. The findings of the HMA would inform the extent of any necessary water infrastructure upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended).

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

The site has full permission for 70 dwellings (E/32720) with an associated Section 106 Agreement.

The landowner has provided a high-level viability appraisal taking into account the likely mitigation and contributions required. This has been appraised by Burrows-Hutchinson Ltd on behalf of the Council and their assessment found that the development of the remaining phases of the sites, not currently benefitting from planning permission, would be economically viable and capable of delivering 25% affordable dwellings in line with Policy AHOM1 in the rLDP. The summary sheet of the financial viability appraisal and Burrows Hutchinson Ltd commentary can be found in Appendix 2

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

Yes, it is considered that increasing the number of dwellings proposed by 50 dwellings (227 in total) is realistic and deliverable. Part of the site has permission, and this is reflected in the identified housing figure. As noted above, it has been proposed that the allocation should be expanded to include the wider site within the revised LDP resulting in an allocation measuring 18.7ha.

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

It is proposed that the site should accommodate 50 more dwellings. It is anticipated that these will be delivered at a rate of 5 in 2027/28; 10 in 2028/29; 10 in 2029/30; 5 in 2030/31; 5 in 2031/32; and 15 in 2032/33.

**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 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 provision in settlement cluster 3.

**Representations Received**

Four representations have been received to the inclusion of the site as an additional site, they are summarised below:

**Representation 5 – Adrian Thompson (Lightwater TPC) on behalf of Colum Carty, Parc Emlyn Developments Limited**

Parc Emlyn Developments Limited supports the uplift in numbers proposed for the allocation at the former Emlyn Brickworks site. The uplift in numbers will make an important contribution toward establishing a more robust flexibility allowance across the Plan period. It will help ensure sufficient land will be available, should rates of delivery at other sites fall behind, to deliver the housing requirement during the Plan period. The site is not subject to any significant physical or other constraints which would act to constrain the proposed rise in the scale of development.

***Council Response:*** Support welcomed.

**Representation 31(b) – Arwel Evans, Lichfields on behalf of RSAI**

The representation objects to the inclusion of the site citing concerns over its deliverability and questions whether the site can deliver the additional dwellings proposed for the site. The representation suggests an alternative site for inclusion.

**Council Response:** Significant progress has been made and steps taken towards delivering the site in recent years. Please see questions (c), (d) and (e) above.

## **Representation 42 – Natural Resources Wales**

Respondent provided the following commentary: 50 units. Contaminated Land, Preliminary Risk Assessment Required. NRW provided comments on application ref E/32720. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

**Council Response:** A contaminated land Preliminary Risk Assessment will be presented in support of a future planning application. The Local Authority ecologists have been consulted, and their comments are presented in supporting information and are also set out above.

## **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

Water supply: A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water network and potential developers would be expected to fund investigations. The findings of the HMA would inform the extent of any necessary water infrastructure upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended).

Public Sewerage: The site lies in close proximity to Garnswllt, Pontyberem, and Cwmgwili WwTW catchment areas. There are various potential points of connection to the public sewers that lead to different WwTW catchment areas. We will be able to assess the impact on the network once further detail is available.

Wastewater Treatment Works: The site lies in close proximity to Garnswllt, Pontyberem, and Cwmgwili WwTW catchment areas. There are various potential points of connection to the public sewers that lead to different WwTW catchment

areas. We will be able to assess the impact on the network once further detail is available.

***Council Response:*** Additional information and detail, including a Hydraulic Modelling Assessment, will be provided in support of future planning applications for the site, as required.



## **PrC3/(ii)- Adjacent to Pant-y-Blodau, Penygroes**

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

Vacant greenfield site, previously used for grazing

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

Residential for 11 dwellings

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

The site adjoins the existing residential allocation Land Adjacent to Pant-y-Blodau GA3/h35 (revised LDP reference PrC3/h22). Site ref. PrC3/h22 benefits from full planning permission for 79 dwellings (permission ref. E/29910) and is in the ownership of a housebuilder. The proposed additional site lies between the existing allocation and Waterloo Road, representing the field's road frontage and has in recent years been acquired by Ballard Homes who intend delivering the site for a further 11 dwellings.

No significant constraints have been identified which would affect the site's delivery. However, the following issues may need considering at application stage:

Mineral Safeguarding: 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.

Open Space: The evidence prepared in support of the proposed additional sites indicated that the site's development may create or exacerbate a shortfall in playspace provision. This will need further consideration at planning application stage and the applicant may be required to provide play space as part of the site's development or make a suitable contribution towards play space elsewhere in the locality in accordance with revised LDP Policy PSD8.

Ecology: The site contains a mosaic of scrub, hedge / shelterbelts and semi-improved grassland. Further survey of the grassland and scrub is advised in support of a future planning application. It is recommended that future development should avoid species rich grassland and allow suitable buffers for the trees. The site falls within the Caeau Mynydd Mawr project area and as such will be required to contribute towards achieving the Caeau Mynydd Mawr SAC Conservation Objectives and to mitigate for the loss of potential supporting habitat and connectivity for the marsh fritillary butterfly in accordance with Policy NE4 of the revised LDP.

Highways: The site will utilise the access point to the north of the site from Waterloo Road which will also serve the adjoining allocation PrC3/h22, rather than develop a second access point directly from Waterloo Road.

**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 in accordance with Policy AHOM which would require an affordable housing contribution of 10% for a site of 11 dwellings.

**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 (11 dwellings) is realistic and deliverable. The density on the site is reflective of the surrounding area and takes account of its relationship with the adjoining Waterloo Road and the adjoining residential allocation.

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

The site is allocated for 11 dwellings. It is anticipated that these will be delivered at a rate of 6 in 2028/29 and 5 in 2029/30.

**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 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.

**Representations Received**

Five representations have been received to the inclusion of the site as an additional site, they are summarised below:

**Representation 27 – Laura Greenman (HCR Law) on behalf of Leyton Harvard**

The representation reiterates and seconds the objection to the site presented by Evans Banks Planning.

***Council Response:*** Please refer to Representation no.35.

**Representation 35 – Jason Evans, Evans Banks Planning**

The representation objects to the inclusion of the site citing concerns relating to its deliverability on account of the adjoining allocation not being delivered to date. The representation also cites concerns over the site's biodiversity value.

***Council Response:*** The representation does not raise issues which suggest that the site should not be allocated. Please see additional information provided in questions (c) and (d) above.

### **Representation 40(d) – Boyer Planning on behalf of Barratt David Wilson Homes South Wales**

The respondent objects to the inclusion of the site based on its scale, noting ‘given they are spatially constraint any potential complications (such as additional land needed to satisfy policy requirements in respect of SAB, SuDS, BNG etc) can have a significant impact on the overall viability and deliverability of any scheme.’

**Council Response:** The site’s density takes account of the requirements for infrastructure and possible mitigation and the number of dwellings identified is considered realistically deliverable.

### **Representation 42 – Natural Resources Wales**

The respondent provided the following commentary: 11 units. Possible Dormouse and Marsh Fritillary butterflies, Caeau Mynydd Mawr SAC 0.5km away, speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

**Council Response:** The Local Authority ecologists have been consulted, and their comments are presented in supporting information.

### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

Water Supply: A water supply can be provided for the additional 11 units.

Public Sewerage: The public sewerage network can accept potential foul flows from the additional 11 units

Wastewater Treatment Works: This site is in Garnswllt WwTW catchment area. The WwTW has capacity to accept foul flows from the site.

**Response:** Comments are noted.

### **PrC3/(iv)- Land adjoining Maes Ifan, Maesquarre Road**

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

Agricultural land for grazing

**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. The site is already proposed as an allocation in the revised deposit LDP (ref. PrC3/h6) for 18 dwellings. It is proposed to increase the number of dwellings to 24. The site can deliver a development of higher density without having a detrimental effect on the area's character, infrastructure, amenity or environmental considerations.

Issues that may need addressing at the planning application stage include:

Ecology: 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.

Amenity: 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. It is considered that the uplift in 6 dwellings to deliver 24 dwellings in total can be accommodated on the site without unduly compromising upon the site's impact on amenity and avoid overlooking 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) 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. 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) Are the number of residential units proposed realistic and deliverable over the plan period?**

Yes, it is considered that the number of dwellings proposed (24 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.

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

It is anticipated that the 6 additional dwellings will be delivered as set out below: 2 in 2027/28; 2 in 2028/29 and 2 in 2029/30.

**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 an allocated site which can reasonably accommodate additional housing 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.

### **Representations Received**

Four representations have been received to the inclusion of the site as an additional site, they are summarised below:

#### **Representation 26 – Mr C L Jones (Director JCR Planning LTD.) on behalf of Mr I Jones**

Objection relating to the site's viability, inadequacy of the highway network in the vicinity and amenity. The 'Maes Ifan' site is a longstanding allocation which, due to its repeated allocation, is stifling growth within this principal centre. There are other more sustainable and readily deliverable sites which will ensure a source of high quality housing for this sustainable community.

**Council Response:** The site is a new allocation in the Revised LDP. There are no known issues relating to the site's viability, highway impact or amenity which cannot be overcome. Please refer to questions (c) and (d) above.

#### **Representation 40(e) – Boyer Planning on behalf of Barratt David Wilson Homes South Wales**

The respondent objects to the inclusion of the site based on its scale, noting 'given they are spatially constraint any potential complications (such as additional land needed to satisfy policy requirements in respect of SAB, SuDS, BNG etc) can have a significant impact on the overall viability and deliverability of any scheme.'

**Council Response:** The site's density takes account of the requirements for infrastructure and possible mitigation and the number of dwellings identified is considered realistically deliverable.

### **Representation 42 – Natural Resources Wales**

The respondent provided the following commentary: 6 units. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment. Ordinary watercourse on edge of the site

**Council Response:** The Local Authority ecologists have been consulted, and their comments are presented in supporting information.

### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

Water Supply: A water supply can be provided for the additional 6 units.

Public Sewerage: The public sewerage network can accept potential foul flows from the additional 6 units. The site is crossed by a 225mm diameter surface water sewer

Wastewater Treatment Works: The site is in Garnswllt WwTW catchment area. The WwTW has capacity to accept foul flows from the site.

**Council Response:** Comments noted.



### **PrC3/(v) - Land off Parklands Road, Ammanford**

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

The site is greenfield land used for grazing. It reflects the frontage of the field between numbers 26 and 54 Parklands Road, Penybanc.

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

The land is proposed for residential use for 9 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 which would affect the site's delivery. However, the following issues may need considering at application stage:

Highways: The site can achieve access directly from Parklands Road and no objection has been received in relation to the access arrangements or impact upon the highway network.

Flooding: There are no significant flood risk considerations for the site. The Flood Map for Planning indicates that approximately 2% of the site falls within flood zone 2 surface water and small watercourses. However, this does not present an insurmountable issue in relation to the site's delivery and no objection has been received in relation to this.

Public Open Space: Appendix B of the Additional Sites Evidence Base Report provides a Public Open Space Assessment of the proposed additional sites. This indicates that the site's development is likely to result in a shortfall of public open space in the locality. It is therefore likely that the development will need to contribute towards the provision of open space either on the site or in the local area.

It is considered that the site could deliver 9 dwellings in a linear pattern of development in an already built-up area. No issues in relation to the site's impact upon amenity, infrastructure services, facilities or its environmental impact been raised.

**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. The landowner has confirmed that they would provide an affordable housing contribution in accordance with the requirements of Policy AHOM1 in the Revised LDP. Given that the site is likely to deliver 9 dwellings the Policy requires a financial contribution to be made, rather than the provision of affordable homes as part of the development.

**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 (9 dwellings) is realistic and deliverable. The density on the site is reflective of the surrounding area and takes account of its elongated shape and a linear pattern of development.

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

The site is allocated for 9 dwellings. It is anticipated that these will be delivered at a rate of 3 in 2027/28; 3 in 2028/29; and, 3 in 2029/30.

**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 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.

### **Representations Received**

Eight representations have been received to the inclusion of the site as an additional site, they are summarised below:

#### **Representation 9 - Adrian David John Pugh**

Support. The representation notes the site's sustainability credentials, that it would provide housing opportunities for local people and that it is readily available and deliverable.

***Council Response:*** Support welcomed.

#### **Representation 10 - Sian Williams**

Support. The representation notes that the site's inclusion represents a logical inclusion to the existing built form, has access to services and facilities, would make a significant contribution towards affordable housing and help sustain community facilities in the locality.

***Council Response:*** Support welcomed.

#### **Representation 11 – Cerith Lewis**

Support. The representation outlines notes that the site has access to services and facilities as well as active travel routes, is readily available for development and represents a natural continuation to the existing built-up area.

***Council Response:*** Support welcomed.

### **Representation 19 – Gavin Griffiths**

Support. The representation outlines notes that the site has access to services and facilities as well as active travel routes, is not subject to any physical or environmental constraints, has the potential to increase its biodiversity value and will make a contribution towards self-build opportunities in the area as well as affordable housing.

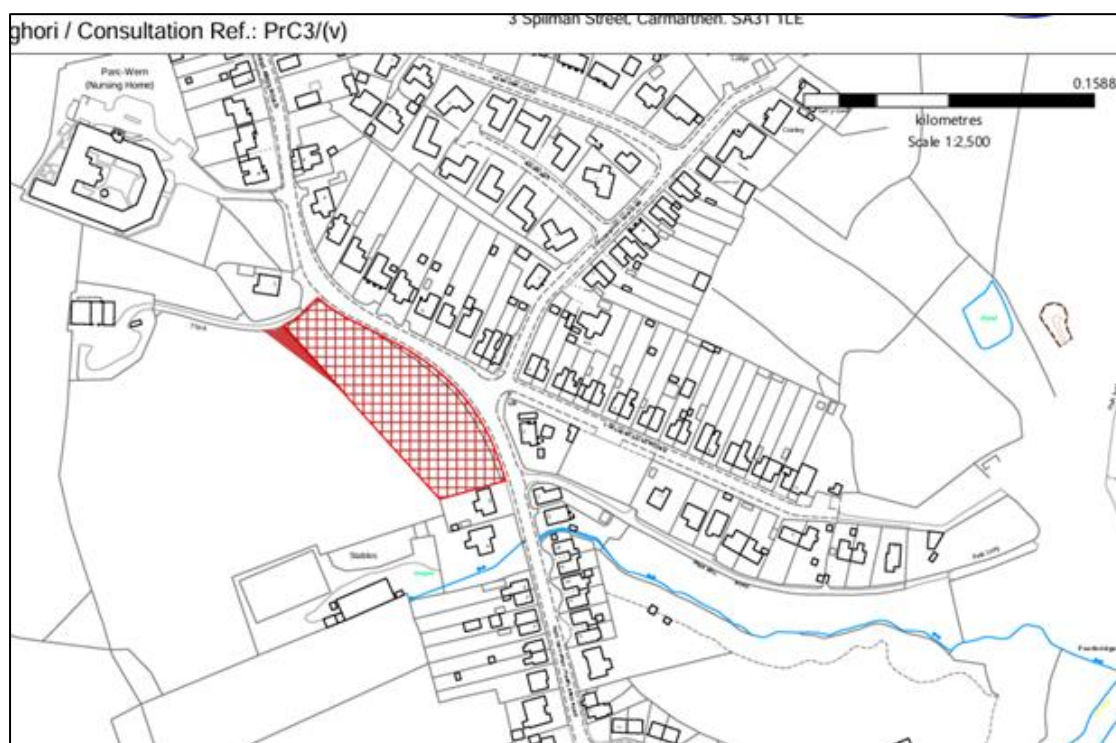
**Council Response:** Support welcomed.

### **Representation 30 – AJ & ES Davies**

The landowners have responded to support the site's inclusion. However, they recommend an amendment is made to the site's rear boundary at its north-western corner to extend the site. The minor revision of the site boundary would result in the site being visually aligned with the rear of the neighbouring garden area and also ensure that the three northernmost plots have sufficient space.

**Council Response:** Support is welcomed. The proposed amendment to the site boundary would be a logical extension to the site which would improve its deliverability allowing sufficient depth for the development of the northernmost plot.

Suggest that the site boundary is amended as requested as shown below with the addition of the area shaded in red.



#### **Representation 40(f) – Boyer Planning on behalf of Barratt David Wilson Homes South Wales**

The respondent objects to the inclusion of the site based on its scale, noting ‘given they are spatially constraint any potential complications (such as additional land needed to satisfy policy requirements in respect of SAB, SuDS, BNG etc) can have a significant impact on the overall viability and deliverability of any scheme.’

**Council Response:** The site’s density takes account of the requirements for infrastructure and possible mitigation and the number of dwellings identified is considered realistically deliverable.

#### **Representation 42 – Natural Resources Wales**

The respondent provided the following commentary: 9 units. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment

**Council Response:** The Local Authority ecologists have been consulted, and their comments are presented in supporting information.

**Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

Water Supply: A water supply can be provided for this site.

Public Sewerage: The public sewerage network can accept potential foul flows from this development site.

Wastewater Treatment Works: The site is in Garnswllt WwTW catchment area. The WwTW has capacity to accept foul flows from the site.

**Council Response:** Comments noted.

## **PrC3/(vii) - Land off Dôl y Dderwen Myddynfych**

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

Agriculture

**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 full planning permission on 28 February 2025 for 31 affordable dwellings (planning permission ref. PL/06515) and it is now proposed as an additional site to reflect this recent permission.

Ecology: This was considered as part of the recent planning application.

Concerns were noted in relation to the development's impact upon trees on the application site and the site's layout was reconfigured in order to avoid impact and overcome this objection. Further matters were suitably addressed through conditions to the permission.

The proposed development will make a financial contribution towards public open space in the locality and towards education. Given that the site benefits from a recent full planning permission, it is considered that any constraints which may affect the site have been addressed and overcome as part of the planning application.

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

The site has permission for 31 affordable dwellings which will be delivered by a housing association. The development's economic viability was considered in the determination of planning application PL/06515.

**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 (31 dwellings) is realistic and deliverable. The density on the site is reflective of the surrounding area and takes account of significant trees and hedgerow present on the site and the need to provide suitable buffers.

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

The site will be delivered by a housing association. The site is proposed for 31 dwellings. It is anticipated that these will be delivered at a rate of 15 in 2025/26 and 16 in 2026/27.

**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, making an important contribution towards the affordable housing provision. 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.

**Representations Received**

Four representations have been received to the inclusion of the site as an additional site, they are summarised below:

**Representation 12 Emyr John**

This allocation should not be made until a full highway assessment has been made as to the safety of the existing residential properties within the area. You should refer to correspondence regarding the highway network that was submitted as a part of planning application E/21668. There is a real danger that should an accident happen near the play park off Heol Llwyd, the whole of the Dolydderwen Estate would not be able to be accessed - fire engines etc. This means that over 200 houses are unsafe.



**Council Response:** Highway safety has been considered in the determination of the planning application and permission subsequently granted.

### **Representation 42 – Natural Resources Wales**

31 units. NRW provided comments on application ref. PL/06515 We note that site is located over 2.5km from the nearest protected site (Caeau Pant-y-Bryn Site of Special Scientific Interest (SSSI). However, a minor watercourse is located directly adjacent to the western boundary of the site. A Main River (River Loughor) is also located 100m West of the site. These watercourses forms a hydrological link with the Carmarthen Bay and Estuaries Special Area of Conservation (SAC) and Burry Inlet Site of Special

Scientific Interest (SSSI) and Ramsar site. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

**Council Response:** The Local Authority ecologists have been consulted, and their comments are presented in supporting information. Ecology was also a consideration in the determination of the planning application.

### **Representation 46 – R, H & D Jones**

It is the view of the respondent that the Council has failed to provide a clear, evidence-based rationale for its decision to include only a limited number of sites within the Consultation on additional housing sites. This Consultation on additional housing sites is only a partial consultation as it does not offer respondents the opportunity to consider and comment on the full range of options that are available.

On the balance of probability not all the sites set out within the Consultation on additional housing sites will be deliverable within the “Plan Period” and therefore the Council should reconsider sites that have been allocated within previous LDPs, update the Site Assessment Table accordingly and include the viable allocated sites into the Revised Local Development Plan or undertake another consultation containing a complete list of options.

**Council Response:** The respondent makes no definitive objection to the additional site within this representation and seeks to object to the site assessment methodology and the omission of his own site at Cwmffrwd.

**Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

Water Supply: This site is committed, and we have made representations on planning application ref PL/06515

Public Sewerage: This site is committed, and we have made representations on planning application ref PL/06515

Wastewater Treatment Works: The site is in Garnswllt WwTW catchment area

**Council Response:** Comments are noted.

## **PrC3/(viii) - Land r/o 108 - 114 Waterloo Road**

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

Vacant agricultural field

**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 landowner submitted a pre-application enquiry in October 2024 for the development of 6 bungalows on the site. The pre-application response indicated that there are no known significant constraints which would affect the site's delivery. However, the following issues may need considering at application stage:

Mineral Safeguarding: Sandstone deposits underlie the site, however the resource at this location is considered to be already largely sterilised as it is within 200m of existing sensitive development.

Flooding: Approximately 15% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3) at the site's south-eastern boundary along a stream. The proposed dwellings shall be located at the north western part of the site. Any future planning application submitted will be informed by an appropriate level of information in the form of a Drainage Statement and commensurate Flood Consequences Assessment in accordance with the guidance set out within Technical Advice Note 15 to inform the proposed development and to evidence that any risks are manageable and can be mitigated for in scheme design.

Open Space: The evidence prepared in support of the proposed additional sites indicated that the site's development may create or exacerbate a shortfall in play space provision. This will need further consideration at planning application stage and the applicant may be required to provide play space as part of the site's

development of make a suitable contribution towards play space elsewhere in the locality in accordance with revised LDP Policy PSD8.

Ecology: The site comprises semi-improved grassland, a watercourse and tree line. Further survey of the grassland and scrub is advised in support of a future planning application. It is recommended that future development should avoid species rich grassland and allow suitable buffers for the trees and watercourse. The site falls within the Caeau Mynydd Mawr project area and as such will be required to contribute towards achieving the Caeau Mynydd Mawr SAC Conservation Objectives and to mitigate for the loss of potential supporting habitat and connectivity for the marsh fritillary butterfly in accordance with Policy NE4 of the revised LDP.

Highways: No known issues. Access to the site can be gained directly from the B4297 Waterloo Road to the west.

**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. The landowner has confirmed that they would provide an affordable housing contribution in accordance with the requirements of Policy AHOM1 in the Revised LDP. Given that the site is likely to deliver 6 dwellings the Policy requires a financial contribution to be made, rather than the provision of affordable homes as part of the development.

**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 (6 bungalows) is realistic and deliverable. The density on the site is reflective of the surrounding

area and takes account of the need to retain suitable buffers alongside the watercourse and trees on site as well necessary infrastructure.

The site is owned by Mannor Homes who submitted a pre-application enquiry in October 2024 for the development of 6 bungalows on the site. Mannor Homes previously obtained planning permission to build 4no. dwellings fronting Waterloo Road to the west of the additional site. To date three of the dwellings have been constructed by Mannor Homes and are occupied. Mannor Homes already own the additional site and intend to build the dwellings themselves for sale.

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

The site is allocated for 6 dwellings. It is anticipated that these will be delivered in 2027/28.

**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 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.

**Representations Received**

Two representations have been received to the inclusion of the site as an additional site, they are summarised below:

**Representation 42 – Natural Resources Wales**

The respondent provided the following commentary: 6 units. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

**Council Response:** The Local Authority ecologists have been consulted, and their comments are presented in supporting information.

**Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

Water Supply: A water supply can be provided for this site.

Public Sewerage: The public sewerage network can accept potential foul flows from this development site. The site is crossed by a 150mm diameter foul sewer and a 150mm diameter surface water sewer.

Wastewater Treatment Works: The site is in Garnswllt WwTW catchment area. The WwTW has capacity to accept foul flows from the site.

***Council Response:*** Comments are noted.

## **PrC3/(ix) - Breakers Yard, Gorslas**

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

The Site consists of an established recycling facility, which continues to have a valid operator's licence. The site currently comprises an area of hard standing (approximately 0.9ha) with 2 existing buildings associated with its previous recycling activities. The remaining parts of the site comprise scrub and woodland. Much of the Site is therefore considered to be brownfield, previously developed land.

### **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?**

Much of the site is allocated in the Adopted Local Development Plan (2014) forming part of the larger housing allocation referenced GA3/h44. The eastern part of allocation GA3/h44 was delivered and the western part of the site remains undeveloped. The proposed additional site comprises the western part of the existing allocation and an additional piece of land to the south to form a new residential allocation.

The site was subject to a PAC for the delivery of 60 dwellings. The site was smaller in size and excluded the southernmost part of the proposed additional site.

The following constraints have been identified in relation to the site:

Ecology Comments from NRW are noted below for information. Comments from the Local Authority's Planning Ecologist which are set out within the Additional Sites Evidence Report note that *'The site has recently been subject to a PAC. The site contains hard standing and buildings – potentially suitable. Subject to stepwise. Avoidance of areas of species rich purple moor grass and rush pasture. Semi-natural broad-leaved woodland. Ecological surveys have confirmed the*

*presence of dormouse using the woodland and scrub areas. Additional surveys may be required’.*

A number of surveys have been undertaken to inform the PAC process in relation to the site. The landowner has prepared an ‘Ecology Note’ for the purposes of supporting its inclusion within the rLDP. This Ecology Note is appended to this report for information (Appendix 4). The Ecology Note identifies the surveys undertaken and reports prepared to date and sets out a summary table of their findings and the baseline position at paragraph 4.10. Chapter 5 reflects on the baseline position and identifies how the proposed development may impact upon the site’s biodiversity value. Of particular relevance is paragraph 5.8 of the Ecology Note which sets out the stepwise approach in respect of each identified habitat or species on the site.

The Local Authority’s Planning Ecologist has considered the surveys and reports prepared as well as the Ecology Note. In response to the Ecology Note, they have provided the following comments:

*Relevant PPW12 sections:*

*“Ancient woodland, semi-natural woodlands, individual ancient, veteran and heritage trees and ancient hedgerows are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value. Such trees, woodlands and hedgerows are to be afforded protection from development which would result in their loss or deterioration” 6.4.43*

*“Permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits.” 6.4.42*

*“Trees, hedgerows, groups of trees and areas of woodland are of great importance for biodiversity. They are important connecting habitats for resilient ecological networks and make an essential wider contribution to landscape character, culture, heritage and sense of place, air quality, recreation and local climate moderation. They also play a vital role in tackling the climate emergency...” 6.4.37*



*“Planning authorities must protect trees, hedgerows, groups of trees and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial green infrastructure function.” 6.4.39*

*“Where trees, woodland and hedgerows are present, their retention, protection and integration should be identified within planning applications.” 6.4.40*

*“Proposals in statutory designated sites are, as a matter of principle, unacceptable and therefore must be excluded from site searches undertaken by developers. This principle also extends to those sites containing protected species and habitats which are irreplaceable\* and must be safeguarded. Such sites form the heart of resilient ecological networks and their role and the ecosystem services they provide must be protected, maintained and enhanced and safeguarded from development. It will be wholly exceptional for development to be justifiable in such instances.*

*\*Habitats, including the natural resources which underpin them, which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. Examples include, ancient woodland and veteran trees, ancient hedgerows, wet woodlands, sand dunes, peatland, species rich grassland, long undisturbed soils, blanket bog, salt marsh and lowland fen.” 6.4.15 1b)*

*Losses at the site:*

- Section 7 habitat – semi-natural broadleaved woodland (this is described as irreplaceable in PPW12 6.4.43 and woodland should not be destroyed without clearly defined public benefits). An NVC survey has not been undertaken for the woodland or scrub areas at the site,*

*so a detailed breakdown of woodland types is not known. The full extent of the losses has not been quantified.*

- *Dormouse (European Protected Species) habitat with confirmed dormouse presence (they prefer the younger scrubber sections of woodland). The full extent of the losses has not been quantified.*
- *Long-undisturbed soils (irreplaceable according to PPW12 6.4.15). The soils that would be destroyed at the development are likely to have section 7 purple moor grass and rush characteristics but will be transitioning towards section 7 semi-natural woodland soils. The full extent of the losses has not been quantified.*

*Retained at the site:*

- *All areas that are currently section 7 purple moor grass and rush pasture (although there is some uncertainty here since an NVC for the entire site has not been carried out and there is some inconsistency between the grassland NVC, restoration plans and phase 1 survey)*
- *Some of the semi-natural broadleaved woodland outside the development*
- *Some of the scrub outside the development*
- *Some of the older trees/outgrown ancient hedges within the development – however these will lose a lot of their ecological value through fragmentation of the woodland habitat and disturbance from surrounding human habitation*

*Enhanced/improved at the site:*

- *Section 7 purple moor grass and rush pasture of exceptional quality (27 indicator species) – management of this could potentially be secured with an appropriate fully financed long term management and monitoring agreement with a suitably competent third party (eg CCC CMM project)*
- *Further areas of section 7 purple moor grass and rush pasture could be restored, this would need to be carefully managed with further loss of scrub/woodland/dormouse requirements (it is worth noting that in*

*section 5.6 of the Asbri report some of the areas proposed for restoration would be under the 80 home development*

- *Retained woodland and scrub at the site could be managed to enhance the areas for dormice*
- *Potential improvements could help with maintaining marsh fritillary metapopulation*

*Compensation possibilities:*

- ***Offsite compensation must be a last resort to satisfy PPW12 step-wise approach requirements***
- *Dormouse licensing typically requires compensation planting of dormouse habitat at a ratio of 2:1 by area, connecting to the retained habitat. This would not be possible within the blue line boundary due to other habitats already being present. Surrounding roads may make this difficult.*
- *Woodland would have to be compensated offsite at a ratio of at least 3:1 by area. The new woodland would be 20-30 years growth behind the existing woodland and would have far less ecological, landscape and carbon storage value for many years. The woodland would need ongoing management to create the diversity of age structure of the existing woodland. Depending on the NVC woodland survey there may be very specific soil/drainage requirements for any proposed woodland creation. However, new woodland must not destroy any priority/species rich grassland habitats*
- *CMM contribution would be required for loss of landscape permeability (buildings block flight paths of marsh fritillary)*

The loss of the semi-natural broadleaved woodland and the loss of Dormouse Habitat will need further consideration. The development layout set out within the Ecology Note seeks to avoid the more mature woodland. The landowner is committed to undertake additional NVC survey work in response to the Ecologist's comments to assist with identifying the woodland types on the site so that any loss can be fully quantified and ultimately compensated for. It is

considered that this matter can be given further consideration and addressed at application stage. The surveys undertaken indicate that the hedgerow along the site's road frontage provides dormouse habitat. NRW have noted that a Dormouse Mitigation and Conservation Strategy would need to be submitted at planning application stage. The Landowner is committed to provide this in support of a future planning application to identify how the proposed site layout will retain connectivity around the site and provide enhancement.

The site falls within the Caeau Mynydd Mawr project area and as such will be required to contribute towards achieving the Caeau Mynydd Mawr SAC Conservation Objectives and to mitigate for the loss of potential supporting habitat and connectivity for the marsh fritillary butterfly in accordance with Policy NE4 of the revised LDP.

Contamination and Coal Mining In terms of coal mining legacy, a Coal Mining Risk Assessment has been prepared in relation to the Site. The assessment finds that there is no shallow underground mining of coal beneath the site. There are no ground instability constraints associated with historic coal mining legacy at the Site, and therefore no engineering or location based mitigation measures are considered necessary. In their response to the PAC consultation, the Coal Authority agree with the conclusions of the report.

A Ground Investigation Factual and Interpretative Report has been prepared in relation to the Site. The report finds that the former recycling centre area of the Site will require further investigation and will likely require remediation. Outside of this area, the soils sampled were not found to present an unacceptable risk to the proposed site users or controlled waters, and these areas of the Site may be considered suitable for development without remedial works.

The consultation responses received from both NRW and Council's Environmental Health Officer in relation to contaminated land note that a Preliminary Risk Assessment will be required and likely a remediation strategy.

Flooding A small portion of the site falls within zone 2 and 3 of the NRW Surface Water and Small Water Courses designation at its southernmost point. Given that the affected area is relatively small and at the edge of the site, it is considered that the site's layout can avoid developing this area and therefore flood risk is unlikely to be a constraint affecting the site's delivery.

Mineral Safeguarding Superficial sand and gravel deposits underlie the site, however the resource at this location is considered to be already largely sterilised as it is within 200m of existing sensitive development.

Open Space: The evidence prepared in support of the proposed additional sites indicated that the site's development may create or exacerbate a shortfall in public open space provision. This will need further consideration at planning application stage and the applicant may be required to provide open space as part of the site's development or make a suitable contribution towards open space elsewhere in the locality in accordance with revised LDP Policy PSD8.

Highways Access to the Site with good visibility in both directions can be achieved directly off Cefneithin Road to the north. This section of Cefneithin Road is subject to a 20mph speed restriction. A Transport Statement has been prepared which demonstrates that the site is in a sustainable location closely related to a range of services and facilities in Gorslas and Cross Hands. Comments from the Local Authority's Highways Section are set out within the Evidence Report prepared in support of the consultation on the additional sites. These comments do not identify any constraints which would affect the site's delivery.

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

The landowner has provided a high-level viability appraisal taking into account the likely mitigation and contributions required. This has been appraised by Burrows-Hutchinson Ltd on behalf of the Council and their assessment found that

the development would be economically viable and capable of delivering 20% affordable dwellings in line with Policy AHOM1 in the rLDP. The summary sheet of the financial viability appraisal and Burrows Hutchinson Ltd commentary can be found in Appendix 2.

**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 (80 dwellings) is realistic and deliverable. The density on the site is reflective of the existing residential development in the surrounding area and its layout takes account of the ecological features and habitat connectivity on the site. There are no constraints identified which indicate that 80 dwellings could not reasonably be delivered on the site. Furthermore, the site falls within an area identified as a Principal Centre in the revised LDP and as such its scale and sustainability credentials make it one of the most appropriate areas to focus growth in the County.

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

The site is owned by a local housing developer who intends to deliver the dwellings for sale. The site is allocated for 80 dwellings. It is anticipated that these will be delivered at a rate of 5 in 2026/27; 10 in 2027/28; 20 in 2028/29; 20 in 2029/30; 15 in 2030/31; and, 10 in 2031/32.

**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 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 provision in settlement cluster 3.

### **Representations Received**

Five representations have been received to the inclusion of the site as an additional site, they are summarised below:

#### **Representation 27 – Laura Greenman (HCR Law) on behalf of Leyton Harvard**

The representation reiterates and seconds the objection to the site presented by Evans Banks Planning.

**Council Response:** Please refer to Representation no.48.

#### **Representation 31(c) – Arwel Evans, Lichfields on behalf of RSAI**

The representation objects to the inclusion of the site citing concerns over its viability and ecological constraints.

**Council Response:** Please see questions (c), (d) and (e) above. A viability appraisal presented by the landowner demonstrates that the site can be delivered profitably and will be developed by the landowner who is a local housebuilder. As noted above, the site is ecologically constrained. However, the information provided to date indicates that the site can be delivered for 80 dwellings in accordance with the stepwise approach as set out within Planning Policy Wales.

#### **Representation 42 – Natural Resources Wales**

The respondent provided the following commentary: 80 units. Potential contaminated Land, Preliminary Risk Assessment Required. We recommend you seek the advice of your Local Authority's Planning Ecologist to determine if there is a reasonable likelihood of protected species being present within the site and to determine whether surveys are required. Otter surveys may be required. welsh water sewerage catchment. Cernydd Carmel SAC and Caeau Mynydd Mawr SAC approximately 1.5km away.

**Council Response:** A contaminated land Preliminary Risk Assessment will be presented in support of a future planning application. The Local Authority ecologists

have been consulted, and their comments are presented in supporting information and are also set out above.

#### **Representation 48 – Jason Evans, Evans Banks Planning**

The representation objects to the inclusion of the site citing concerns relating to its biodiversity value, noting that the site will not be able to accommodate 80 dwellings. The representation also makes reference to the impact which remediation works will have upon the site's viability.

**Council Response:** The representation does not raise issues which suggest that the site should not be allocated. Please see additional information provided in questions (c) and (d) above.

#### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

Water Supply: A water supply can be provided for this site.

Public Sewerage: The public sewerage network can accept potential foul flows from this development site. The site is crossed by a 225mm diameter foul sewer.

Wastewater Treatment Works: The site is in Pontyberem WwTW catchment area. The WwTW has capacity to accept foul flows from the site.

**Council Response:** Comments noted.



## Cluster 6

### SuV59/(i) - North East of Bancyfelin School, Bancyfelin

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

The site is greenfield land

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

Residential development of 16 affordable 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.

Highways: The site can achieve access directly from Cwrt Melin road. and no objection has been received in relation to the access arrangements or impact upon the highway network.

Flooding: Less than 5% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3). The site has a pending application for 16 affordable dwellings, no objections were received in regard to flooding. The 2019 SFCA concluded that there are no significant flood risk considerations for the site.

Public Open Space: Appendix B of the Additional Sites Evidence Base Report provides a Public Open Space Assessment of the proposed additional sites. This indicates that the site's development is likely to result in a shortfall of public open space in the locality. However, as part of the pending application it has already been agreed upon that a financial contribution will be made towards open space.

Ecology: No concerns. Net Benefit for Biodiversity and step-wise approach followed as part of pending planning application.

It is considered that the site could deliver 16 affordable dwellings in in an already built-up area. The site is bounded to the North by a railway line, concerns around

this have been overcome as part of the application. Other than this, no issues in relation to the site's impact upon amenity, infrastructure services, facilities or its environmental impact have been raised.

The application is now subject to the signing of the section 106 agreement which is imminent. The section 106 agreement secures financial contributions towards education and as mentioned above, open space. A contribution of **£9,500** will be made towards education.

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

The site is to be developed for 100% affordable housing therefore there are no significant constraints to its development.

**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 (16 affordable dwellings) is realistic and deliverable. The density on the site is reflective of the surrounding area.

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

The application is now awaiting the completion of the Section 106 agreement, which is expected imminently. Accordingly, the decision notice is anticipated to be issued in the near future. Following this, a discharge of conditions application will need to be submitted and the work is expected to start in September.

**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 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.

### **Representations Received**

Two representations have been received to the inclusion of the site as an additional site, they are summarised below:

#### **Representation 42 – Louise Edwards on behalf of NRW**

16 Units. Potential contaminated Land, Preliminary Risk Assessment Required. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment

***Council Response:*** Comments noted.

#### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

We have made representations on planning application ref PL/08456. The site is in Bancyfelin WwTW catchment area

***Council Response:*** Comments noted.

## Potential Commitments

### Cluster 1

#### PrC1/(i)- Former Lidl, Priory Street, Carmarthen

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

Vacant / Former supermarket

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

Residential land (40 dwellings)

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

Any constraints on the site have been overcome. Planning permission was granted on the site in December 2023 (PL/03279) for 48 flats (8 of which are supported living units and therefore won't be counted in the housing supply). Work has commenced on the site and is expected to be completed in Spring 2027.

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

Yes, the development is viable and will provide 40 affordable units (plus 8 supported living units).

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

Yes, planning permission has been granted for the site and the development has commenced.

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

Work has commenced on the site and is expected to be completed by Spring 2027.

**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.

**Representations Received**

Two representations have been received to the inclusion of the site as an additional site, and is summarised below:

**Representation 42 – Natural Resources Wales**

NRW provided comments on application ref. PL/03279. Speak to the LPA ecologist regarding species surveys, Welsh Water sewerage catchment.

***Council Response:*** Comments noted, the development is underway.

**Representation 50 – Dewi Griffiths on behalf of Dŵr Cymru Welsh Water**

Comments provided include:

Water Supply: The site is committed, and we have made representations on planning application ref PL/03279.

Public sewerage: The site is committed, and we have made representations on planning application ref PL/03279.

Wastewater Treatment Works: This site is in the Parc y Splotts WwTW catchment area.

***Council Response:*** Comments noted.

## **PrC1/(ii) - Land south of Pant Glas, 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 (13 dwellings)

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

Any constraints on the site have been overcome. Planning permission was granted on the site in August 2023 (PL/05756) for 13 dwellings. Work has commenced on the site.

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

Yes, the development is viable. 4 of the dwellings in the development are affordable.

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

Yes, planning permission has been granted for the site and the development has commenced.

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

Work has commenced on the site and the development is expected to be delivered in the following timescale: 2 in 2024-25; 4 in 2025-26; 4 in 2026-27; 3 in 2027-28.

**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.

### **Representations Received**

Two representations have been received to the inclusion of the site as an additional site, and is summarised below:

#### **Representation 42 – Natural Resources Wales**

NRW provided comments on application ref. PL/09230. Borders minor watercourse / Main River (Afon Gwili) 310 Afon Tywi SSSI +marine / SAC 840m. Speak to the LPA ecologist regarding species surveys, Welsh Water sewerage catchment.

***Council Response:*** Comments noted, the development is underway.

#### **Representation 50 – Dewi Griffiths on behalf of Dŵr Cymru Welsh Water**

Comments provided include:

Water Supply: The site is committed, and we have made representations on planning application ref W/38754 & W/31902.

Public sewerage: The site is committed, and we have made representations on planning application ref W/38754 & W/31902.

Wastewater Treatment Works: This site is in the Parc y Splotts WwTW catchment area.

***Council Response:*** Comments noted.

## SeC1/(i) - Black Horse, Meinciau

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

Vacant

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?**

There are no fundamental constraints affecting the site. The site has been subject to the approval of a Certificate of Lawfulness for an existing use development and relates to a material start having been made on the site for 30 dwellings. A subsequent application for amendments to the design and appearance of the site has been made.

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

The site has an extant permission which has covered the requirements for planning contributions.

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

The site is under construction with the proposal showing that 30 dwellings (as proposed in the commitment figure) can be developed.

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

The agent for the development has provided the following timescale for delivery.

Dates	2025/26	2026/27	2027/28	2028/29
Number of dwellings constructed	7	7	8	8



As of May 2025, 1 dwelling has been completed with a further 4 under construction. These timescales for delivery will be updated in the 2025 timing and phasing of the housing trajectory.

**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 committed site which can reasonably accommodate additional housing 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.

**Representations Received**

Two representations have been received relating to the inclusion of the site as an additional site. They are summarised below:

**Representation 42 – Louise Edwards on behalf of NRW**

30 units. NRW provided comments on application ref W/17123 & PL/04466. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

***Council Response:*** Noted. The site is under construction.

**Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

This site is in the Pontyates WwTW catchment area. The site is committed and DCWW have made representation on planning application ref PL/07471

***Council response:*** Noted. The site is under construction.

## **SuV2/(i) - Land at Maes y Meillion, Llanybri**

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

Greenfield / Agricultural

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

Residential development for up to 13 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. The site benefits from an extant Outline planning permission (PL/00629) and was recently granted Reserved Matters (PL/06867), and all potential constraints have been considered as part of these applications.

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

In terms of viability in relation to planning permission PL/00629, this is set out within the S.106 agreement which contains the requirement for onsite Affordable Housing (30% in line with Policy). A financial contribution towards education was agreed as well as a financial contribution towards the improvement of road safety infrastructure and upgrades/provision of pedestrian facilities in the village of Llanybri.

**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 (up to 13 dwellings) are realistic and deliverable. The site owners are keen to progress with the development of the site and gained Reserved Matters permission in May 2025. The application provided a site layout plan illustrating how the site could be developed.

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

Reserved Matters was approved in May 2025, however there are conditions that need discharging on both the Outline permission and Reserved Matters first, and SAB needs to be obtained. After discussions with the agent, it is anticipated that the site will begin development next year.

**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.

**Representations Received**

One representation has been received to the inclusion of the site as an additional site, and is summarised below:

**Representation No 42 – Louise Edwards, Natural Resources Wales**

13 Units. NRW provided comments on application ref. PL/00629 and PL/06867 .  
Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment. Taf Estuary SSSI / Carmarthen Bay & Estuaries SAC 2 km away

***Council Response:*** Comments noted

## Cluster 2

### PrC2/(i)- Land adj 91 Maes yr Haf, Pwll

The site was granted outline planning permission in March 2024 with the submission of a Reserved Matters in August 2024. This RM application was withdrawn.

Following information received from the property design team in May 2025, no further application is to be submitted. Due to cost increases and the works required to resolve site conditions the Council decided that the project is not viable at this time.

The Council proposes to **remove** this site from the additional site table, with a consequential reduction in the additional site housing supply figure. These figures are set out within chapter 2 above.

#### **Representations Received**

Two representations have been received relating to the inclusion of the site as an additional site. They are summarised below:

#### **Representation 42 – Louise Edwards on behalf of NRW**

8 units. NRW provided comments on application ref PL/04244. SSSI Pwll Lagoon 234m away. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

***Council response:*** Comments Noted

#### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

This site is committed, and we have made representations on planning application ref PL/04244. This site is in the Llanelli Coastal WwTW catchment area

***Council response:*** Comments Noted

## **SeC3/(i) - Land opposite Parc Pendre, Kidwelly**

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

Vacant

**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 constraints. The site is under construction.

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

N/A. The site is under construction

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

Yes

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

The site is under construction with the 16 dwellings to be completed in 2025/26

**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 committed site which can reasonably accommodate additional housing 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.

### **Representations Received**

Two representations have been received relating to the inclusion of the site as an additional site. They are summarised below

#### **Representation 42 – Louise Edwards on behalf of NRW**

16 units. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

***Council Response:*** The site is under construction

#### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

This site is committed, and we have made representations on planning application ref S/30578 & S/40190. The site is in the Kidwelly WwTW catchment area.

***Council Response:*** Comments Noted. The site is under construction

## **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 which will need to be considered as part of any reserved matters applications 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.

**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.

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

Yes. A Statement of Common Ground (Appendix 3) 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.

**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 this 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.

**Representations Received**

Three representations have been received relating to the inclusion of the site as an additional site. They are summarised below



**Representation 31(f) Mr Arwel Evans (Lichfields) on behalf of RSAI**

An outline planning application submitted in 2007 for up to 70 homes was approved on 8th August 2022. Nearly three years have passed and a reserved matters application has not been submitted. The decision notice includes an informative that the applicant will need to enter into a s106 agreement. It is unclear if this has been done. Given the time needed to obtain reserved matters approval and to get on site, Lichfields question whether the whole site will be completed by the end of the plan period given that it doesn't seem to be a developer for this site. Lichfields analysis in Start to Finish notes that it takes on average 2.3 years to start delivering homes on sites of this size once detailed approval is obtained. This raises a question as to whether the site will be completed by the end of the plan period, especially given that reserved matters application hasn't been forthcoming and there is no developer identified.

**Council Response:** Reference is drawn to the answers in questions (d), (e) and (f) which refers to the Statement of Common Ground, in addition to the intention of the landowner to submit a Reserved Matters application. In light of evidence presented to the Council, it is satisfied that this site will be brought forward on the terms set out.

**Representation 42 – Louise Edwards on behalf of NRW**

70 units. Carmarthen Bay & Estuaries SAC / GCR and Pembrey Coast SSSI (+ marine) 1.2km Away. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

**Council Response:** The site has outline planning permission and the submission of the reserved matters application will consider any detailed requirements set out within the representor's comment

**Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water network and potential developers would be expected to fund investigations. The findings of the HMA would inform the extent of any necessary

water infrastructure upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). The site is crossed by 8" and 200mm diameter watermains, and a 20" diameter abandoned watermain.

The public sewerage network can accept potential foul flows from this development site. The site is crossed by a 225mm diameter foul sewer.

The site is in the Kidwelly WwTW catchment area. The WwTW has capacity to accept foul flows from the site.

***Council Response:*** Comments Noted

## Cluster 3

### PrC3/(iii)- Land at rear of 10-12 Norton Road, Penygroes

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

Site is currently under construction for residential use but was previously domestic curtilage of adjacent properties.

**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 has planning permission for 6 dwellings and is currently under construction. 3 dwellings were completed in 2024/25 and 3 are under construction.

Given the site's current planning status and that it is being delivered it is considered that there are no constraints or obstacles which would affect the site's delivery.

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

Any constraints, as well as the need to provide affordable housing, have been considered as part of the determination of the relevant planning applications (E/30557 and E/32947).

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

The number of residential units proposed mirror those set out in planning application E/32947; it is considered that both the numbers and trajectory set out are realistic and deliverable over the plan period.

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

The site has permission for 6 dwellings. 3 have been completed in 2024/25 and a further 3 are under construction, anticipated to be completed in 2025/26.

**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.

**Representations Received**

Two representations have been received relating to the inclusion of the site as an additional site. They are summarised below

**Representation 42 – Natural Resources Wales**

The respondent provided the following commentary: 6 units. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

**Response:** The Local Authority ecologists have been consulted, and their comments are presented in supporting information.

**Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

Water Supply: This site is committed, and we have made representations on planning application ref E/32947

Public Sewerage: This site is committed, and we have made representations on planning application ref E/32947

Wastewater Treatment Works: The site is in Garnswllt WwTW catchment area

**Response:** Comments are noted.

## **SuV25/(i) - Cysgod yr Eglwys, Llannon (Adj St Nons Church)**

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

The site is currently under construction for residential use but was previously a vegetated greenfield site comprising scrub and trees.

### **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 has planning permission for 34 dwellings and is currently under construction. 13 dwellings were completed in 2024/25 and a further 2 are under construction. Given the site's current planning status and that it is being delivered it is considered that there are no constraints or obstacles which would affect the site's delivery.

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

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/24486. A Section 106 Agreement has been entered into to secure the delivery of 4 affordable dwellings, a financial contribution of £11,000 towards affordable housing, £43,500 towards Education and the management of an ecological area and on-site open space provision.

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

The number of residential units proposed mirror those set out in the relevant planning permissions; it is considered that both the numbers and trajectory set out are realistic and deliverable over the plan period.

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

The site has planning permission for 34 dwellings and is currently under construction. 13 dwellings were completed in 2024/25 and a further 2 are under construction, expected to be completed in 2025/26. A further 10 are expected to be completed in 2026/27 and 9 in 2027/28.

**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.

**Representations Received**

Three representations have been received relating to the inclusion of the site as an additional site. They are summarised below

**Representation 42 – Natural Resources Wales**

The respondent provided the following commentary: 34 Units. NRW provided comments on application ref S/32126. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

**Response:** The Local Authority ecologists have been consulted, and their comments are presented in supporting information.

**Representation 47 – R, H & D Jones**

It is the view of the respondent that the Council has failed to provide a clear, evidence-based rationale for its decision to include only a limited number of sites within the Consultation on additional housing sites. This Consultation on additional

housing sites is only a partial consultation as it does not offer respondents the opportunity to consider and comment on the full range of options that are available.

On the balance of probability not all the sites set out within the Consultation on additional housing sites will be deliverable within the “Plan Period” and therefore the Council should reconsider sites that have been allocated within previous LDPs, update the Site Assessment Table accordingly and include the viable allocated sites into the Revised Local Development Plan or undertake another consultation containing a complete list of options.

**Council Response:** The respondent makes no definitive objection to the additional site within this representation and seeks to object to the site assessment methodology and the omission of his own site at Cwmffrwd.

#### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

Water Supply: This site is committed, and we have made representations on planning application ref S/32126

Public Sewerage: This site is committed, and we have made representations on planning application ref S/32126

Wastewater Treatment Works: The site is in Llannon WwTW catchment area

**Response:** Comments are noted.

## **PrC3/(vi) - Land opposite Plough & Harrow, Ammanford**

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

Currently under construction for residential use but previously an agricultural field and car park.

**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 has planning permission for 9 dwellings and is currently under construction. 3 dwellings were completed in 2024/25 and a further 3 are under construction. Given the site's current planning status and that it is being delivered it is considered that there are no constraints or obstacles which would affect the site's delivery.

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

Any constraints, as well as the need to provide affordable housing, have been considered as part of the viability work associated with planning application PL/05546 and a financial contribution made towards the provision of affordable housing.

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

The number of residential units proposed mirror those set out in planning application PL/05546; it is considered that both the numbers and trajectory set out are realistic and deliverable over the plan period.

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

The site has permission for 9 dwellings. 3 have been completed in 2024/25 and a further 3 are under construction, anticipated to be completed in 2025/26. It is anticipated that a further 3 dwellings will be completed in 2026/27.



**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.

**Representations Received**

Two representations have been received relating to the inclusion of the site as an additional site. They are summarised below

**Representation 42 – Natural Resources Wales**

The respondent provided the following commentary: 9 Units. NRW provided comments on application ref PL/05546. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment. Ordinary watercourse Northern part of the site.

**Council Response:** The Local Authority ecologists have been consulted, and their comments are presented in supporting information.

**Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

Water Supply: This site is committed, and we have made representations on planning application ref PL/05546

Public Sewerage: This site is committed, and we have made representations on planning application ref PL/05546

Wastewater Treatment Works: The site is in Garnswllt WwTW catchment area.

**Council Response:** Comments are noted.

## Cluster 4

### SuV37/(i) - Former Coedmor School, Cwmann

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

Former school / employment units.

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

Residential land (21 dwellings)

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

Any constraints on the site have been overcome as planning permission was granted on the site in January 2024 (PL/03083) for residential development, and development has commenced.

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

Yes, the site is providing 20 affordable dwellings and one private dwelling.

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

Yes, planning permission has been granted for the site and the development has commenced.

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

Development is underway on the site, and the development is expected to be completed by May 2026.

**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.

### **Representations Received**

Three representations have been received to the inclusion of the site as an additional site, they are summarised below:

#### **Representation 40 (g) - Boyer Planning on behalf of Barratt David Wilson Homes**

The respondent raises concerns about sites located within Phosphate Sensitive Areas and the resultant delays in the development of the site ultimately affecting the trajectory. The respondent suggests the inclusion of an alternative site – Land off Heol-y-Mynydd, Bryn which will not result in the loss of high-quality agricultural land.

***Council Response:*** Comments noted, the development is underway.

#### **Representation 42 – Natural Resources Wales**

NRW provided comments on application ref PL/03083 and PL/07576. Speak to the LPA ecologist regarding species surveys, Welsh Water sewerage catchment. Nutrient sensitive catchment HRA agreed at planning application stage.

***Council Response:*** Comments noted, the development is underway.

#### **Representation 50 – Dewi Griffiths on behalf of Dŵr Cymru Welsh Water**

Comments provided include:

Water Supply: The site is committed, and we have made representations on planning application ref PL/03083.

Public sewerage: The site is committed, and we have made representations on planning application ref PL/03083.

Wastewater Treatment Works: This site is in the Lampeter WwTW catchment area.

***Council Response:*** Comments noted

## Cluster 5

### SeC15/(i) - Land at Cilycwm Road, Llandovery

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

Greenfield

**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. All potential constraints have been considered during the preparation and determination of planning application PL/04067 and have been addressed in the subsequent planning permission by way of planning conditions.

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

In terms of viability in relation to planning permission PL/04067, the scheme is a Carmarthenshire County Council development of 100% affordable (social rented homes) which is required to help meet identified housing need in the area. This will be best met by providing a mix of 1-, 2- and 3-bedroom homes complying with the WDQR space standards, which the development will deliver. Furthermore, the Housing Service can confirm that the ward of Llandovery is an area of high housing need. There is an under-supply of social rented homes across all house types in the Llandovery ward and surrounding area, which results in people in urgent housing need having to wait an unacceptable length of time to be housed in suitable accommodation.

**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 (14 dwellings) is realistic and deliverable. Given the type of development that the developer has built within the area the density is considered suitable.

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

The site is owned by the local authority who intend to go out to tender with a view to commencing on site in autumn 2025. Completion and handover is expected in Autumn 2026. It is anticipated that all 14 dwellings should be delivered in 2026/27.

**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.

**Representations Received**

Four representations have been received relating to the inclusion of the site as an additional site. They are summarised below

**Representation 13 – Simon Mead**

Llandovery Cilycwm Road seems to be very restricted when the entire area is available and given the difficulty in finding one and two person property locally - this could be expanded considerably as most social housing in Llandovery is no longer available after right to buy came in.

**Council response:** Potential development sites in Llandovery are restricted due to environmental constraints, in particular from flood risk. Site SeC15/(i) represents an

opportunity to build in an area where constraints do not pose any particular difficulties. Together with the other housing allocations in the town identified in the Revised LDP, it is considered that no further allocations will be required for the settlement.

#### **Representation 40(h) Boyer Planning on behalf of BDWH**

Whilst we appreciate that this site technically benefits from planning permission and is therefore recognised as a potential commitment within the Council's Additional Sites Consultation document, the concerns raised in our previous Deposit Plan Representations remain in that the site is located within a Phosphate Sensitive Area and therefore reliant on external infrastructure improvements to ensure sufficient mitigation is in place before they can be brought into use.

**Council response:** Matters relating to phosphates have been considered and addressed in the planning application.

#### **Representation 42 NRW**

14 Units. NRW provided comments on application ref PL/04067 Nutrient sensitive SAC catchment, planning permission concluded there will be no Likely Significant Effect for this site. River Tywi SAC / SSSI 535m. Flood Zone 2 (Rivers), Flood Risk from Reservoirs, Site specific FCA required. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

**Council response:** NRW comments on application PL/04067 are noted and have been taken into account in the determination of the application and in the conditions of the subsequent permission. The Local Authority ecologists have been consulted, and their comments are presented in supporting information.

#### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

The respondent states that the site is committed and that they have commented on planning application PL/04067.

***Council response:*** Comments noted. No further action.



## Cluster 6

### SeC19/(i) - Land Adjacent to the Beeches, Whitland

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

Greenfield Site

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

Residential, indicative figure of 50 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. The site benefits from an extant Outline planning permission (PL/02934) and all potential constraints have been considered as part of this application. The site was previously under consideration as a potential location for the proposed Hywel Dda hospital, which resulted in a period of uncertainty; however, it is no longer being considered for that purpose. In early 2025, Pobl Group began the process of acquiring the site for development. They are currently finalising the legal contract, which is nearing completion, and have confirmed their intention to acquire the site and submit the Reserved Matters application within the required timescale in 2025

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

In terms of viability in relation to planning permission PL/02934, this is set out within the S.106 agreement which contains the requirement for onsite Affordable Housing (30% in line with Policy). However, Pobl Group will deliver in excess of this, being a housing association. A financial contribution towards education was also agreed.

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

Yes, it is considered that the number of indicative dwellings proposed (50 dwellings) are realistic and deliverable. A Statement of Common Ground (SoCG)

has been drawn up and signed between the local authority and the agent which details potential constraints (and how these are minimal and can be overcome), and information concerning viability and deliverability. Reference is made to the SoCG below (Appendix 3). Pobl Group began the process of acquiring the site for development in 2025 and are planning to submit the Reserved Matters application within the required timescale in 2025. The application provided a site layout plan illustrating how the site could be developed.

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

Pobl Group intend on exchanging contracts with the landowner by July 2025. The Reserved Matters application for a development of circa 50-60 units will be submitted before the end of September. Although Pobl Group are currently considering a range of 50 to 60 units, the indicative number has not yet been formally considered; for the purposes of this consultation, an assumed figure of 50 dwellings will be used. It is anticipated that Reserved Matters approval will be granted in early 2026 with all pre-commencement conditions subsequently cleared to facilitate a start on site in early 2027. The first occupations are expected in November 2027 with the build completed in 2029.

**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.

### **Representations Received**

Three representations have been received to the inclusion of the site as an additional site, they are summarised below:

### **Representation No 31(g) – Arwel Evans (Lichfields) on behalf of RSAI**

An outline planning permission was granted 30th September 2022. Nearly three years have passed and a reserved matters application has not been submitted. Evidence has not been presented to demonstrate who the developer of this site is and to provide a timeline of when reserved matters will be submitted/approved, start on site and completion of the units. Given the time needed to obtain reserved matters approval and to get on site, Lichfields question whether the whole site will be completed by the end of the plan period. Lichfields analysis in Start to Finish notes that it takes on average 2.3 years to start delivering homes on sites of this size once detailed approval is obtained. This raises a question as to whether the site will be completed by the end of the plan period, especially given that reserved matters application hasn't been forthcoming and there is no developer identified.

**Council Response:** Please see questions (c), (d), (e) and (f) above. The answers to these questions outline the current situation of the site, including details of the developer as well as the timescales for delivering the site.

### **Representation 42 – Louise Edwards, NRW**

50 Units. NRW provided comments on application ref PL/02934 Minor watercourse through site. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.

**Council Response:** Comments noted.

### **Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)**

This site is committed, and we have made representations on planning application ref PL/02934. The site is in Whitland WwTW catchment area.

**Council Response:** Comments noted

## Appendix 1 – Timing and Phasing of additional sites

The table below identifies the timing and phasing for development on the additional sites

### Allocations

Ref	Site	Total Units	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
<b>PrC1/(iii)</b>	Land adjacent to 93 & 94 Abergwili Road, Carmarthen	9	0	0	0	0	0	0	0	0	0	3	3	3	0	0	0
<b>PrC1/(iv)</b>	Land off Trevaughan Road, Carmarthen	30	0	0	0	0	0	0	0	0	0	0	0	15	15	0	0
<b>PrC2/(ii)</b>	Land at Cefncaeau, Llanelli	91	0	0	0	0	0	0	0	0	40	51	0	0	0	0	0
<b>PrC2/(iii)</b>	Land at Pendderi Road, Bryn	35	0	0	0	0	0	0	0	0	20	15	0	0	0	0	0
<b>PrC2/(v)</b>	Land off Heol y Mynydd, Bryn	80	0	0	0	0	0	0	0	0	0	40	40	0	0	0	0
<b>SeC6/(i)</b>	Land off Heol y Parc, Hendy	7	0	0	0	0	0	0	0	0	4	3	0	0	0	0	0
<b>SeC6/(ii)</b>	Fforest Garage, Fforest	8	0	0	0	0	0	0	0	0	4	4	0	0	0	0	0
<b>SeC6/(iii)</b>	Land at Fforest Road	35	0	0	0	0	0	0	0	0	0	15	20	0	0	0	0
<b>SeC7/(i)</b>	Land at Pontarddulais Road	60	0	0	0	0	0	0	0	0	15	15	15	15	0	0	0
<b>PrC3/(i)</b>	Emlyn Brickworks, Penygroes	50	0	0	0	0	0	0	0	0	0	5	10	10	5	5	15
<b>PrC3/(ii)</b>	Adjacent to Pant-y-Blodau, Penygroes	11	0	0	0	0	0	0	0	0	0	0	6	5	0	0	0

Ref	Site	Total Units	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
<b>PrC3/(iv)</b>	Land adjoining Maes Ifan, Maesquarre Road	6	0	0	0	0	0	0	0	0	0	2	2	2	0	0	0
<b>PrC3/(v)</b>	Land off Parklands Road, Ammanford	9	0	0	0	0	0	0	0	0	0	3	3	3	0	0	0
<b>PrC3/(vii)</b>	Land off Dôl y Dderwen, Myddynfych	31	0	0	0	0	0	0	0	15	16	0	0	0	0	0	0
<b>PrC3/(viii)</b>	Land r/o 108-114 Waterloo Road	6	0	0	0	0	0	0	0	0	0	6	0	0	0	0	0
<b>PrC3/(ix)</b>	Breakers Yard, Gorslas	80	0	0	0	0	0	0	0	0	5	10	20	20	15	10	0
<b>SuV59/(i)</b>	North East of Bancyfelin School	16	0	0	0	0	0	0	0	4	6	6	0	0	0	0	0

### Commitments

Ref	Site	Total Units	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
<b>PrC1/(i)</b>	Former Lidl, Priory Street, Carmarthen	40	0	0	0	0	0	0	0	0	40	0	0	0	0	0	0
<b>PrC1/(ii)</b>	Land south of Pant Glas, Carmarthen	13	0	0	0	0	0	0	2	4	4	3	0	0	0	0	0
<b>SeC1/(i)</b>	Black Horse, Meinciau	30	0	0	0	0	0	0	0	7	7	8	8	0	0	0	0
<b>SuV2(i)</b>	Land at Maes y Meillion, Llanybri	13	0	0	0	0	0	0	0	0	3	5	5	0	0	0	0

Ref	Site	Total Units	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
<b>SeC3/(i)</b>	Land opposite Parc Pendre, Kidwelly	16	0	0	0	0	0	0	0	16	0	0	0	0	0	0	0
<b>SeC3/(ii)</b>	Land at Monksford Street, Kidwelly	70	0	0	0	0	0	0	0	0	0	20	20	20	10	0	0
<b>PrC3/(iii)</b>	Land at rear of 10-12 Norton Road, Penygroes	6	0	0	0	0	0	0	3	3	0	0	0	0	0	0	0
<b>SuV25/(i)</b>	Cysgod yr Egwlys, Llannon (Adj St Nons Church)	34	0	0	0	0	0	0	13	2	10	9	0	0	0	0	0
<b>PrC3/(vi)</b>	Land opposite Plough & Harrow, Ammanford	9	0	0	0	0	0	0	3	3	3	0	0	0	0	0	0
<b>SuV37/(i)</b>	Former Coedmor School, Cwmann	21	0	0	0	0	0	0	0	21	0	0	0	0	0	0	0
<b>SeC15/(i)</b>	Land at Cilycwm Road, Llandovery	14	0	0	0	0	0	0	0	0	14	0	0	0	0	0	0
<b>SeC19/(i)</b>	Land adjacent to the Beeches, Whitland	50	0	0	0	0	0	0	0	0	10	36	4	0	0	0	0

## Appendix 2 - Development Viability Appraisals

Appendix 2 identifies the following key sites where a Financial Viability Appraisal and Burrows Hutchinson commentary has been undertaken.

Additional Sites:

- PrC2/(v) – Land off Heol y Mynydd, Bryn
- SeC7/(i) – Land at Pontarddulais Road, Llangennech
- PrC3/(i) – Emlyn Brickworks, Penygroes,
- PrC3/(ix) – Breakers Yard, Gorslas

## **Burrows Hutchinson Ltd – Additional Site Reference PrC2/(v) – Land off Heol y Mynydd, Bryn**

You have asked me to review a Financial Viability Assessments (FVA) for this site, which you propose adding as a “key site” to your Revised LDP. The FVA has been submitted by BDW South Wales as the potential developer of the site. It proposes a development of 160 new homes, of which 40 (i.e. 25%) are affordable dwellings. The site has a net developable area of almost 4 hectares. I am aware that this is a larger development than that proposed for site ref: PrC2/(v) in your March 2025 Additional Sites Consultation document; but in the absence of a submitted FVA for the 80-home development referred to on page 6 of that document, you have asked me to review the submitted FVA for the larger scheme.

I have also adopted the same methodology and principles as were used in compiling my viability assessments for other “key sites” and for the higher level Countywide Viability Assessments, as set out in my previous Financial Viability Report(s) for your Revised LDP.

In the course of my Review, I have been able to discuss individual elements and assumptions in this FVA with Cai Parry at Barratt David Wilson’s office in Cardiff. The attached Summary sheet from the FVA shows the proposed development to be viable; and to be capable of delivering 25% of the new homes as affordable dwellings, in line with Policy AHOM1 in the Revised LDP. I am also satisfied that

- a) the anticipated sales values in the FVA for the open market homes are pitched at a reasonable and appropriate level, bearing in mind the site’s location and market evidence from other recent/current developments ;
- b) transfer values for the affordable dwellings are correctly based on the Council’s most recent published rates for the Llanelli and District AHAA;
- c) estimated construction costs are broadly in line with the rates and assumptions upon which my high-level countywide viability assessments were based, and are similarly consistent with the rates and assumptions used in other “key site” viability assessments;



- d) the site value shown on the Summary sheet (Appendix C) is broadly in line with the benchmark for a development site that is expected to command sales values for the open market dwellings in the order of £3,160 psm;
- e) other development costs allowed for in the FVA have been taken at rates that again broadly align with those used in my Countywide and “key-site” viability assessments.

The sums allowed in the FVA for s.106 obligations have not all been officially confirmed by the Council but, in total, they exceed the allowances made for s.106 obligations in my Countywide high-level viability assessments; and are also greater (in £/dwelling) than the allowances that have been made for s.106 obligations in any of the other “key site” FVA’s. They include

- £358,160 as a contribution towards educational requirements/provision – on the worst-case assumption that there is no spare capacity in existing schools;
- £404,080 for the provision of appropriate public open space, leisure/recreational facilities
- £490,000 for public transport and active travel; and
- £80,000 for biodiversity measures.

The forecast development profit shown on Appendix D 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 40 (i.e. 25%) affordable homes. I am also satisfied that the site value indicated is sufficient to encourage the landowner in this case to release the land for the proposed development.

### 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%
<b>RESIDENTIAL GDV</b>		<b>160</b>	<b>£</b>	<b>38,713,382</b>	
Commercial/Investment NDV			£	-	0.0%
<b>TOTAL SALES REVENUE</b>			<b>£</b>	<b>38,713,382</b>	
Other Revenue (Grant or Income)			£	-	
<b>TOTAL DEVELOPMENT REVENUE</b>			<b>£</b>	<b>38,713,382</b>	<b>100.0%</b>
		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%
<b>Physical Infrastructure</b>					
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%
<b>Housing Construction</b>					
Build & External Costs	£/unit	£125,091	£	20,014,488	51.7%
Professional Fees		6.00%	£	1,200,869	3.1%
<b>Commercial/Investment Construction</b>					
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%
<b>TOTAL DEVELOPMENT COST</b>			<b>£</b>	<b>31,418,826</b>	

<b>Profit</b>	<b>£</b>	<b>7,294,556</b>	<b>18.8%</b>
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<b>Surplus/(Shortfall) in Profit</b>		<b>£207,613</b>	<b>2.93%</b>
against Benchmark/Target	<b>£7,086,943</b>	made up of:	
on open mkt housing sales	£6,787,000	target return	<b>20.00%</b>
on affordable housing cost	£299,943	target return	<b>6.00%</b>
on non-residential NDV	£0	target return	<b>15.00%</b>

### Primary Data, KPI's and Sensitivity Testing

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

#### Development Densities

<b>Residential</b>	40.0 dwellings/net ha 3,451.9 sqm/net hectare	16.2 dwellings/acre 86.3 avg sqm/dwelling
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#### Average Residential Values

	£ psf	£ psm	N°	%	Avg GIA	Total GIA m <sup>2</sup>	
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	<b>100.00%</b>	(open market sales only)
Affordable Housing	<b>100.00%</b>	(affordable housing values)
Commercial NDV	<b>100.00%</b>	(all non-residential values)
Housing Construction	<b>100.00%</b>	(housebuilding & normal external costs)
Commercial/Investment	<b>100.00%</b>	(non-residential construction costs)
Physical Infrastructure	<b>100.00%</b>	(abnormal & other normal site costs)
Community Infrastructure	<b>100.00%</b>	(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

## **Burrows Hutchinson Ltd – Additional Site Reference SeC7/(i) – Land off Pontarddulais Road, Llangennech**

You have asked me to review Financial Viability Assessments (FVA's) for this site, which you propose adding as a "key site" to your Revised LDP. The FVA has been submitted by Jason Evans of Evans Banks Planning Ltd on behalf of the site owner; and proposes a development of 60 new homes, of which 12 (i.e. 20%) are affordable dwellings. The site has a net developable area of almost 4 acres. I have also adopted the same methodology and principles as were used in compiling my viability assessments for other "key sites" and for the higher level Countywide Viability Assessments, as set out in my previous Financial Viability Report(s) for your Revised LDP.

In the course of my Review, I have been able to discuss individual elements and assumptions in this FVA with Jason Evans. The attached Summary sheet from the FVA shows the proposed development to be viable; and to be capable of delivering 20% of the new homes as affordable dwellings, in line with Policy AHOM1 in the Revised LDP. I am also satisfied that

- a) the anticipated sales values in the FVA for the open market homes are pitched at a reasonable and appropriate level, bearing in mind the site's accessibility to the M4 motorway as well as to other local facilities and amenities ;
- b) transfer values for the affordable dwellings are correctly based on the Council's most recent published rates for the Llanelli and District AHAA;
- c) estimated construction costs align with the rates and assumptions upon which my high-level countywide viability assessments were based, and are similarly consistent with the rates and assumptions used in other "key site" viability assessments;
- d) the site value shown on the Summary sheet (Appendix C) is broadly in line with the benchmark for a development site that is expected to command sales values for the open market dwellings in the order of £3,200 psm;
- e) other development costs allowed for in the FVA have been taken at rates that again broadly align with those used in my Countywide and "key-site" viability assessments.

It is also my understanding that the sums allowed in the FVA for s.106 obligations are in line with your policy expectations for this site. They are:

- £128,400 as an appropriate contribution towards educational requirements/provision arising from the proposed development; and
- £157,780 for the provision of appropriate leisure/recreational facilities.

The forecast development profit shown on Appendix C 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. I am also satisfied that the site value indicated is sufficient to encourage the landowner in this case to release the land for the proposed development.

### 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%
<b>RESIDENTIAL GDV</b>		<b>60</b>	<b>£ 16,499,330</b>	
Commercial/Investment NDV			£ -	0.0%
<b>TOTAL SALES REVENUE</b>			<b>£ 16,499,330</b>	
Other Revenue (Grant or Income)			£ -	
<b>TOTAL DEVELOPMENT REVENUE</b>			<b>£ 16,499,330</b>	<b>100.0%</b>
	NDA	£/ac		
<b>Land (incl acquisition costs)</b>	3.95	£265,581	£ 1,106,500	6.7%
Survey & Planning Costs			£ 85,000	0.5%
<b>Community Infrastructure</b>	£/unit	£4,770	£ 286,180	1.7%
<b>Physical Infrastructure</b>				
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%
<b>Housing Construction</b>				
Build & External Costs	£/unit	£141,067	£ 8,464,000	51.3%
Professional Fees		6.00%	£ 507,840	3.1%
<b>Commercial/Investment Construction</b>				
Build & External Costs			£ -	0.0%
Professional Fees			£ -	0.0%
<b>All Construction Contingency</b>		5.00%	£ 516,962	3.1%
<b>Sale, Letting &amp; Marketing Costs</b>			£ 187,400	1.1%
<b>Finance Costs</b>			£ 895,564	5.4%
<b>TOTAL DEVELOPMENT COST</b>			<b>£ 13,416,846</b>	

<b>Profit</b>	<b>£ 3,082,484</b>	<b>18.7%</b>
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<b>Surplus/(Shortfall) in Profit</b>	<b>£8,888</b>	<b>0.29%</b>
against <b>Benchmark/Target</b>	<b>£3,073,596</b>	made up of:
on open mkt housing sales	£2,968,000	target return <b>20.00%</b>
on affordable housing cost	£105,596	target return <b>6.00%</b>
on non-residential NDV	£0	target return <b>15.00%</b>

### Primary Data, KPI's and Sensitivity Testing

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

#### Development Densities

<b>Residential</b>	37.5 dwellings/net ha 3,530.0 sqm/net hectare	15.2 dwellings/acre 94.1 avg sqm/dwelling
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#### 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	<b>100.00%</b>	(open market sales only)
Affordable Housing	<b>100.00%</b>	(affordable housing values)
Commercial NDV	<b>100.00%</b>	(all non-residential values)
Housing Construction	<b>100.00%</b>	(housebuilding & normal external costs)
Commercial/Investment	<b>100.00%</b>	(non-residential construction costs)
Physical Infrastructure	<b>100.00%</b>	(abnormal & other normal site costs)
Community Infrastructure	<b>100.00%</b>	(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

## **Burrows Hutchinson Ltd – Additional site reference PrC3(i) Emlyn Brickworks**

The Emlyn Brickworks site is already included in the Deposit RLDP; but the new proposal is to add a further 50 dwellings to that allocation during the plan period.

### **Site Ref: PrC3/(i) Emlyn Brickworks, Penygroes**

Through his agent (Adrian Thompson) with the help of a cost consultant (Gareth Whitney of Whitney Construction Consulting Ltd), the site promoter has produced an updated FVA for a development of 140 new homes, of which 35 (i.e. 25%) would be affordable dwellings. The site has a net developable area of approximately 9 acres.

In the course of my Review, I have been able to discuss individual elements and assumptions in this FVA with the site promoter's consultants; and in particular the cost consultant, Gareth Whitney. The attached Summary sheet from the FVA shows the proposed development to be viable; and to be capable of delivering 25% of the new homes as affordable dwellings, in line with Policy AHOM1 in the Revised LDP. I am also satisfied that

- a) the anticipated sales values in the FVA for the open market homes are pitched at a reasonable and appropriate level, bearing in mind (for example) prices being achieved on the Parc Cerrig development at Cross Hands;
- b) transfer values for the affordable dwellings are correctly based on the Council's most recent published rates for the Ammanford and Amman Valley AHAA;
- c) estimated construction costs align with the rates and assumptions upon which my high-level countywide viability assessments were based, and are similarly consistent with the rates and assumptions used in other "key site" viability assessments;
- d) the site value shown on the Summary sheet (Appendix A) is broadly in line with the benchmark for a development site that is expected to command sales values for the open market dwellings in the order of £2,800 psm;
- e) other development costs allowed for in the FVA have been taken at rates that again broadly align with those used in my Countywide and "key-site" viability assessments.

It is also my understanding that the sums allowed in the FVA for s.106 obligations are in line with your policy expectations for this site. They are:

- £227,048 as an increased contribution towards educational requirements/provision arising from the proposed development;
- £214,340 in respect of requirements under your SPG for the Caeau Mynydd Mawr Special Area of Conservation; and

- £175,468 in compensation for the loss of Open Mosaic Habitat.

The forecast development profit, which exceeds 20% on the anticipated gross revenue from the sale of open market homes, indicates that the proposed development is viable; with what one might term a “viability buffer” of some £130,000 against unforeseen eventualities. I am also satisfied that the site value indicated is sufficient to encourage the landowner in this case to release the land for the proposed development.

### Financial Viability Appraisal - Summary

<b>Gross Development Value</b>		Units (N°)			% GDV
Open Market Housing		105	£	24,930,444	85.7%
Affordable Housing	25.0%	35	£	4,157,241	14.3%
<b>RESIDENTIAL GDV</b>		<b>140</b>	<b>£</b>	<b>29,087,685</b>	
Commercial/Investment NDV			£	-	0.0%
<b>TOTAL SALES REVENUE</b>			<b>£</b>	<b>29,087,685</b>	
Other Revenue (Grant or Income)			£	-	
<b>TOTAL DEVELOPMENT REVENUE</b>			<b>£</b>	<b>29,087,685</b>	<b>100.0%</b>
	NDA	£/ac			
<b>Land (incl acquisition costs)</b>	9.04	£221,145	£	2,128,500	7.3%
Survey & Planning Costs			£	-	0.0%
<b>Community Infrastructure</b>	£/unit	£4,406	£	616,855	2.1%
<b>Physical Infrastructure</b>					
Normal On-Site Works	£/unit	£3,500	£	490,000	1.7%
Abnormal Works/Costs	£/unit	£4,700	£	658,050	2.3%
Professional Fees		5.00%	£	57,403	0.2%
<b>Housing Construction</b>					
Build & External Costs	£/unit	£121,800	£	17,052,000	58.6%
Professional Fees		5.00%	£	852,600	2.9%
<b>Commercial/Investment Construction</b>					
Building Costs			£	-	0.0%
Professional Fees			£	-	0.0%
<b>All Construction Contingency</b>		5.00%	£	955,503	3.3%
<b>Sale, Letting &amp; Marketing Costs</b>			£	651,935	2.2%
<b>Finance Costs</b>			£	263,299	0.9%
<b>TOTAL DEVELOPMENT COST</b>			<b>£</b>	<b>23,726,145</b>	
			<b>Profit</b>	<b>£ 5,361,540</b>	<b>18.4%</b>

	<b>Surplus/(Shortfall) in Profit</b>	<b>£132,056</b>	<b>2.53%</b>
against <b>Benchmark/Target</b>	<b>£5,229,484</b>	made up of:	
on open mkt housing sales	£4,986,089	target return	<b>20.00%</b>
on affordable housing cost	£243,396	target return	<b>6.00%</b>
on non-residential NDV	£0	target return	<b>15.00%</b>

### Primary Data, KPI's and Sensitivity Testing

<b>Total Site Value</b>	<b>£2,000,000</b>				
Net Developable Area	9.04	acres	3.66	hectares	
Site Value /ac and /ha	£221,145	per net acre	£546,448	per net ha	
<b>Abnormal /</b>					
<b>Strategic Site Costs</b>	£72,762	per net acre	£179,795	per net ha	
<b>Development Densities</b>					
<b>Residential</b>	38.3	dwellings/net ha	15.5	dwellings/acre	
	3,060.1	sqm/net hectare			
<b>Average Residential Values</b>		<b>£ psm</b>	<b>£ psf</b>	<b>N°</b>	<b>%</b>
Open Market dwellings	£237,433	£2,832	£263	105	
Affordable - social rent	£117,295	£1,738	£161	32	91.4%
Affordable - intermediate	£134,603	£1,711	£159	3	8.6%
					<b>GIA sqm</b>
					8,804.00
					2,160.00
					236.00
<b>Sensitivity Testing Facility</b>					
Open Market Housing	<b>100.00%</b>	(open market sales only)			
Affordable Housing	<b>100.00%</b>	(affordable housing values)			
Commercial NDV	<b>100.00%</b>	(all non-residential values)			
Housing Construction	<b>100.00%</b>	(housebuilding & normal external costs)			
Commercial/Investment	<b>100.00%</b>	(non-residential construction costs)			
Physical Infrastructure	<b>100.00%</b>	(abnormal & other normal site costs)			
Community Infrastructure	<b>100.00%</b>	(CIL and/or s.106 obligations except AH)			
Percentage Profit on GDV	18.43%	(blended margin)			
Percentage Profit on Cost	22.60%				
Peak Borrowing	£2,274,003	Interest Cover	271	months	
Peak Equity Requirement	£1,678,691	IRR (before Finance Costs)	47.6%		
Total Equity & borrowing	£3,952,694	Profit on Capital Employed	135.6%		
<b>Site Name: Emlyn Brickworks</b>					
<b>LPA: Carmarthenshire County Council, Site Ref: PrC3/MU1</b>					
<b>Version: Final for RLDP</b>					

NB: This appraisal is not a formal valuation and should not be relied upon as such

15/05/2025

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## **Burrows Hutchinson Ltd – Additional Site Reference PrC3/(ix) Breaker's Yard, Gorslas**

I have reviewed an FVA for a development of 80 new homes, produced by Matt Tyler of N P Linnells on behalf of the site promoter. The site has an estimated net developable area of 5.86 acres.

In the course of my Review, I have been able to discuss individual elements and assumptions in this FVA with its author, Matt Tyler. In my opinion, the attached Summary sheet from the FVA shows the proposed development to be viable; and that it is capable of delivering 20% of the new homes as affordable dwellings, in line with Policy AHOM1 in the Revised LDP. I am also satisfied that

- a) the anticipated sales values in the FVA for the open market homes are pitched at a reasonable and appropriate level, bearing in mind prices being achieved on the Parc Cerrig development at Cross Hands;
- b) transfer values for the affordable dwellings are correctly based on the Council's most recent published rates for the Ammanford and Amman Valley AHAA;
- c) estimated construction costs align with the rates and assumptions upon which my high-level countywide viability assessments were based, and are similarly consistent with the rates and assumptions used in other "key site" viability assessments – but also include an allowance for using air source heat pumps to achieve greater energy efficiency, which I refer to later in this commentary;
- d) the site value shown on the Summary sheet (Appendix B) is broadly in line with the benchmark for a development site that is expected to command sales values for the open market dwellings in the order of £2,800 psm;
- e) other development costs allowed for in the FVA have been taken at rates that again broadly align with those used in my Countywide and "key-site" viability assessments.

It is also my understanding that the sums allowed in the FVA for s.106 obligations are in line with your policy expectations for this site. They are:

- £90,000 as a contribution towards educational requirements/provision, as I understand that there is some spare capacity in existing schools locally; and
- £122,480 in respect of requirements under your SPG for the Caeau Mynydd Mawr Special Area of Conservation.

The forecast developer's profit showing on Appendix B is marginally below the "target" return of just under £3.5 million. However, although an extra cost of £7,500 per dwelling has been included in this particular FVA to cover the cost of achieving a high EPC-A rating, no adjustment has been made to estimated sale values to reflect any premium for the benefit to the future occupiers of that enhanced specification

and lower energy costs. Estimated sale values, both for this and the Emlyn Brickworks site, have been primarily informed by evidence from the recent Parc Cerrig development on the west side of the A48 trunk road – and in close proximity to the Breakers Yard site – where EPC ratings are typically between B82 – B84.

All my previous viability assessments in relation to the Revised LDP have been predicated on the assumption that costs relating to further changes to the Building Regulations, due to be introduced in 2025, will be broadly matched by an uplift in the prices paid for new homes built to the more energy efficient standard (see, for example, paragraph 3.21 in the 2024 Addendum to my 2022 Financial Viability Report). It is evident that the apparent shortfall in profit of £51,170 at Appendix B would be turned into a small surplus, if an average premium of as little as £1,000 per dwelling were added to the FVA.

I am therefore satisfied that the site is capable of delivering a viable development of 80 new homes with an adequate profit margin for the developer. I am also satisfied that the site value indicated is sufficient to encourage the landowner in this case to release the land for the proposed development.

### Financial Viability Appraisal - Summary

<b>Gross Development Value</b>		Units (N°)			% GDV
Open Market Housing		64	£	17,000,000	91.3%
Affordable Housing	20.0%	16	£	1,613,788	8.7%
<b>RESIDENTIAL GDV</b>		<b>80</b>	<b>£</b>	<b>18,613,788</b>	
Commercial/Investment NDV			£	-	0.0%
<b>TOTAL SALES REVENUE</b>			<b>£</b>	<b>18,613,788</b>	
Other Revenue (Grant or Income)			£	-	
<b>TOTAL DEVELOPMENT REVENUE</b>			<b>£</b>	<b>18,613,788</b>	<b>100.0%</b>
	NDA	£/ac			
<b>Land (incl acquisition costs)</b>	5.86	£131,893	£	810,356	4.4%
Survey & Planning Costs			£	175,000	0.9%
<b>Community Infrastructure</b>	£/unit	£2,656	£	212,480	1.1%
<b>Physical Infrastructure</b>					
Normal On-Site Works	£/unit	£10,500	£	840,000	4.5%
Abnormal Works/Costs	£/unit	£10,625	£	850,000	4.6%
Professional Fees		7.51%	£	127,000	0.7%
<b>Housing Construction</b>					
Build & External Costs	£/unit	£133,782	£	10,702,543	57.5%
Professional Fees		5.00%	£	535,127	2.9%
<b>Commercial/Investment Construction</b>					
Build & External Costs			£	-	0.0%
Professional Fees			£	-	0.0%
<b>All Construction Contingency</b>		3.00%	£	391,640	2.1%
<b>Sale, Letting &amp; Marketing Costs</b>			£	247,000	1.3%
<b>Finance Costs</b>			£	278,360	1.5%
<b>TOTAL DEVELOPMENT COST</b>			<b>£</b>	<b>15,169,506</b>	

<b>Profit</b>	<b>£</b>	<b>3,444,282</b>	<b>18.5%</b>
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<b>Surplus/(Shortfall) in Profit</b>	<b>(£51,170)</b>	<b>-1.46%</b>
against <b>Benchmark/Target</b>	<b>£3,495,451</b>	made up of:
on open mkt housing sales	£3,400,000	target return
on affordable housing cost	£95,451	target return
on non-residential NDV	£0	target return

### Primary Data, KPI's and Sensitivity Testing

<b>Total Site Area (Net Developable)</b>	<b>5.86 acres</b>	<b>2.37 hectares</b>
<b>Total Site Value</b>	<b>£772,400</b>	£131,893 / net acre £325,907 / net ha
<b>Abnormal Site Costs</b>	<b>£850,000</b>	£145,144 / net acre £358,650 / net ha

#### Development Densities

<b>Residential</b>	33.8 dwellings/net ha 2,971.7 sqm/net hectare	13.7 dwellings/acre 88.0 avg sqm/dwelling
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#### Average Residential Values

	£ psf	£ psm	N°	%	Avg GIA	Total GIA m²
Open Market dwellings	£265,625	£260	£2,798	64	94.92	6,075.00
Affordable - Social rent	£92,351	£162	£1,742	12	75.0%	53.00
Affordable - Int/other	£126,394	£141	£1,523	4	25.0%	83.00

#### Sensitivity Testing Facility

Open Market Housing	<b>100.00%</b>	(open market sales only)
Affordable Housing	<b>100.00%</b>	(affordable housing values)
Commercial NDV	<b>100.00%</b>	(all non-residential values)
Housing Construction	<b>100.00%</b>	(housebuilding & normal external costs)
Commercial/Investment	<b>100.00%</b>	(non-residential construction costs)
Physical Infrastructure	<b>100.00%</b>	(abnormal & other normal site costs)
Community Infrastructure	<b>100.00%</b>	(CIL and/or s.106 obligations except AH)

Percentage Profit on GDV	18.50%	(blended margin)
Percentage Profit on Cost	22.71%	
Peak Borrowing	£3,018,332	Interest Cover 136 months
Peak Equity Requirement	£2,052,769	IRR (before Finance Costs) 40.0%
Total Equity & borrowing	£5,071,101	Profit on Capital Employed 67.9%

**Site Name:** Cefneithin Road, Gorslas

**LPA:** Carmarthenshire County Council, Site Ref: PrC3/(ix)

**Version:** 1 - market led scheme with 20% policy compliant affordable housing

## Appendix 3 – Statements of Common Ground

Appendix 3 consists of Statements of Common Ground for the following sites

### Additional Sites

- PrC2/(ii) - Land at Cefncaeau, Llanelli
- PrC2/(v) – Land off Heol y Mynydd
- SeC7/(i) – Land at Pontarddulais Road, Llangennech
- PrC3/(i) – Emlyn Brickworks, Penygroes
- PrC3/(ix) – Breakers Yard, Gorslas
- SeC3/(ii) – Land at Monksford Street, Kidwelly
- SeC19/(i) – Land adjacent to the Beeches, Whitland

# **Carmarthenshire Revised Local Development Plan 2018-2033**

Land at Cefncaeau, Llanelli

Statement of Common Ground  
between Carmarthenshire County Council and  
Tata Steel UK Limited

**May 2025**

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## 1. Purpose of this Statement of Common Ground

1.1 This Statement of Common Ground (SoCG) has been prepared by Carmarthenshire County Council (CCC) in collaboration with Tata Steel UK Limited. The SoCG has been prepared as evidence for the Examination of the Revised LDP and as part of the Council's requirement to find additional sites for inclusion in the Plan. This statement will set out matters agreed between the parties and will include the most up to date information available that is relevant to the site's development.

## 2. The Site

2.1 The application site is situated north of the A484 approximately 2.5km from the town centre. The site extends to approximately 4.08 hectares and comprises two field parcels characterised by rough grassland and scrub, enclosed by areas of woodland. The field parcels are divided by overgrown hedges. The site levels are highest along the northern boundary of the site and levels generally fall in a southerly direction. Ground levels are approximately 12.34m AOD at the highest point along the northern boundary of the site and fall to 3.51m AOD in the south of the site.

2.2 The site is bounded by residential dwellings to the north (on Tir Einon and Parc Gitto), and an area of public open space (Tir Einon Park). The south western boundary is formed by the A484, beyond which is the Trostre Works operated by Tata Steel. Further greenfield land within the control of Tata Steel lies to the south.

2.3 Overhead electricity lines cross the northern field parcel, orientated north-west to south-east. A water main also crosses the site in a north west to south east direction.

2.4 Access to the site is currently gained via a field gate from Erw Las (via wider land within Tata Steel's control to the east).

2.5 The Dafen Pil, an NRW designated Main River, flows in a south-westerly direction approximately 125m south of the site. Several tributaries flow into the Dafen Pil including a small drainage channel present along the western boundary of the proposed development site. These watercourses are designated as ordinary watercourses and link the site to the Carmarthen Bay and Estuaries Special Areas of Conservation (SAC) and Burry Inlet and Loughor Estuary SSSI, Ramsar and Proposed SAC. The Wildfowl and Wetlands Centre lies approximately 700m to the south.

## 3. The planning status of the site

3.1 The site is currently allocated within the adopted LDP for residential development under reference GA2/h35 and located on the eastern side of a larger site for 300 dwellings. The western side of GA2/h35 has detailed planning permission for 70 dwellings, and forms part of a separate SoCG undertaken in 2024 which was between Carmarthenshire County Council, Tata Steel and Coastal Housing.

3.2 An 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.

#### 4. Financial viability affecting the commencement of development

4.1 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.

#### 5. Site ownership and access constraints affecting site assessment or the commencement of development

5.1 The site is owned by Tata Steel and following the granting of the outline planning permission the process of taking the site to market is underway. It is expected that the site will be sold to a developer by Autumn 2025, who will then prepare and submit a Reserved Matters application(s).

5.2 There are no direct constraints in regard to obtaining access to the site, with the outline planning permission having considered the vehicular access at its junction with the A484 and the acceptability of the street hierarchy strategy throughout the site.

#### 6. Infrastructure provision necessary to support / enable the development

6.1 The outline planning permission sets out a number of planning conditions which will need to be considered as part of any reserved matters applications including:

- Ground levels
- Disposal of foul and surface water
- Landscape and Ecological Design Scheme, and Management Plans
- Construction Environmental Management Plan
- External Lighting
- Investigating ground conditions including mining works and contaminants.
- Remediation Strategies
- Highway designs, including access and visibility, parking and turning facilities, Active Travel, footpaths.



## 7. The landowner's delivery intentions and trajectory

Dates	2025/26	2026/27	2027/28	2028/29
Anticipated Completions	0	40	51	0

7.1 The housing trajectory above is presented to the Inspectors as part of the additional site exercise.

## 8. Signatories to the Statement of Common Ground

8.1 Carmarthenshire County Council ("The Local Planning Authority") and Tata Steel UK Limited consider that the inclusion of the site as a potential allocation is sustainable, viable and deliverable.

<b>Signed on behalf of The Local Planning Authority</b>	<i>Ian R Llewelyn</i>
<b>Name</b>	Ian Llewelyn
<b>Position</b>	Strategic Policy and Placemaking Manager
<b>Date</b>	22/05/25

<b>Signed on behalf of The Landowner</b>	<i>Andy Pickford</i>
<b>Name</b>	Andy Pickford
<b>Position</b>	Director, Property
<b>Date</b>	22/05/25

## Appendix 1

### Location Plan

Enw'r Safle / Site Name:

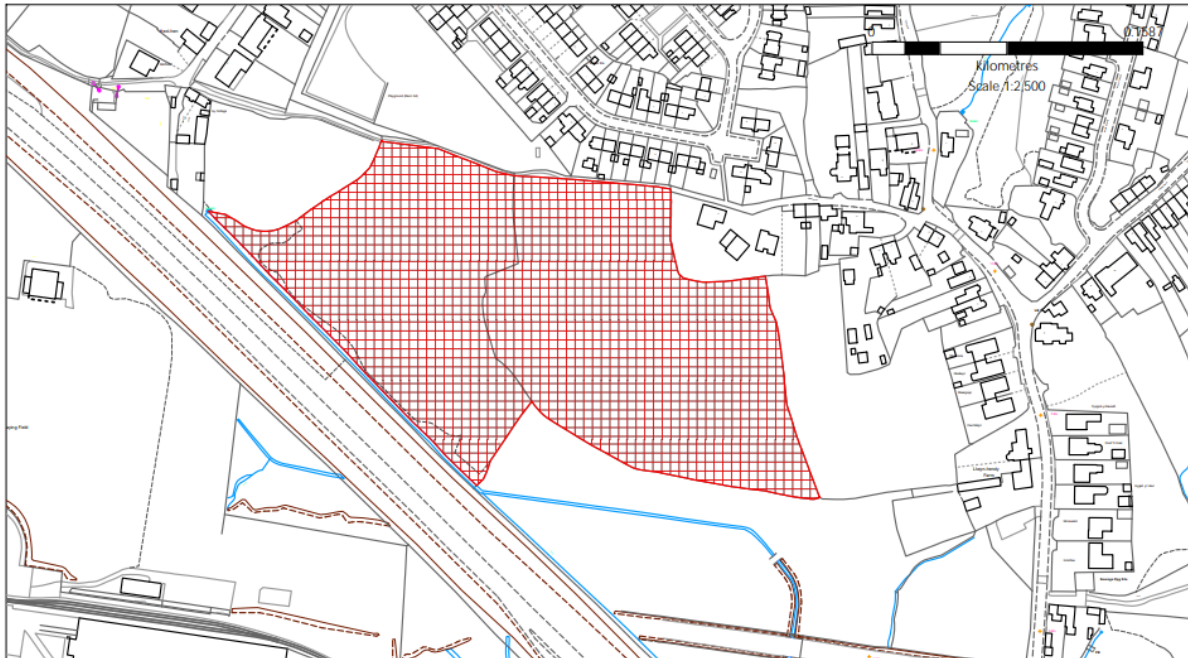
Tir yn Cefncaeau / Land at Cefncaeau

Anheddiad / Settlement: Llanelli

Cyf. Ymgynghori / Consultation Ref.: PrC2/(ii)

Lle a Chynaliadwyedd.  
Lle, Seilwaith a Datblygu Economaidd.  
3 Heol Spilman, Caerfyrddin. SA31 1LE

Place and Sustainability.  
Place, Infrastructure and Economic Development.  
3 Spilman Street, Carmarthen. SA31 1LE



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# **Carmarthenshire Revised Local Development Plan 2018-2033**

Land at Heol y Mynydd, Bryn, Llanelli

Statement of Common Ground  
between Carmarthenshire County Council, Boyer  
Planning and Barratt David Wilson Homes

**June 2025**

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## 1. Purpose of this Statement of Common Ground

1.1 This Statement of Common Ground (SoCG) has been prepared by Carmarthenshire County Council (CCC) in collaboration with Boyer Planning and Barratt David Wilson Homes (BDWH). The SoCG has been prepared as evidence for the Examination of the Revised LDP and as part of the Council's requirement to find additional sites for inclusion in the Plan. This statement will set out matters agreed between the parties, and those matters not agreed and pursued by the developer. This statement will also include the most up to date information available that is relevant to the site's development.

## 2. The Site

2.1 The application site is a greenfield site located at the south-eastern edge of the settlement of Bryn, with the north-eastern edge of Llwynhendy forming the sites south western boundary. The site comprises of agricultural fields with a number of mature trees and hedgerows along the field boundaries.

2.2 The site is bounded by existing residential properties on its western, southern and eastern boundaries and is situated with an urban setting.

2.3 Access is currently achieved via the existing agricultural track which connects the site to Heol y Mynydd and the wider highway network. This track (which comprises a Public Right of Way) also serves the existing bungalow to the north of the site.

2.4 81% of the site falls within Grade 3b of the Agricultural Land Classification, whilst the remaining site falls within the Urban classification.

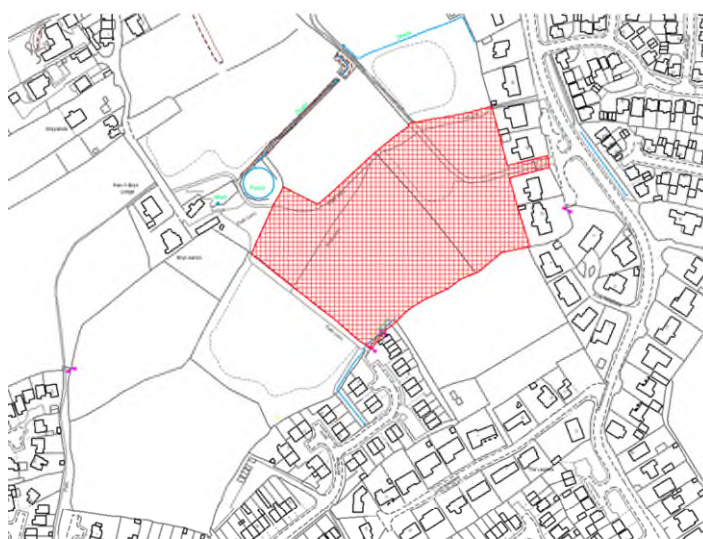
2.5 SFCA as part of the preparation of the Revised LDP concluded that there was no significant flood risk associated with the development. Less than 5% falls within the NRW Surface Water and Small Water courses (Zones 2 and 3).

2.6 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.

## **Matters to consider**

### **Council position**

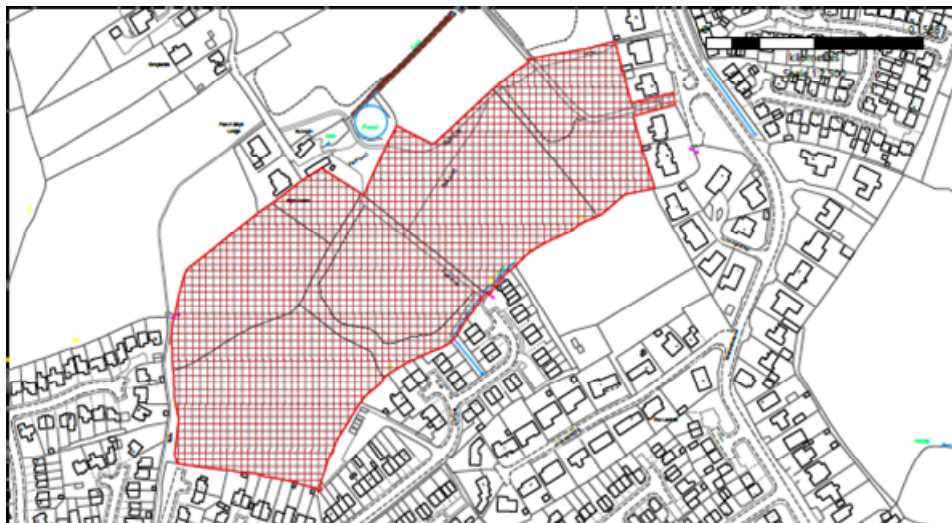
2.7 The Council as part of its evidence base have clearly expressed its intention to allocate a smaller portion of land (subject to the Inspectors report) than that consulted upon as part of the additional site consultation. Its inclusion as an additional site at that stage was to allow the potential to consider various parcels of land within the site, and to explore 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.



### **Barratt David Wilson Homes' position**

2.8 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 and first considered as a candidate site in 2018 – Reference SR/086/053. As part of the additional site consultation in March 2025 the Council identified a larger site for consideration but confirmed its intention to reduce the scale of the site following the consultation. BDWH made representation as part of the consultation outlining their assessment on the suitability and deliverability of the site for 160 dwellings.

2.9 Should the Inspectors consider that an 80 dwelling site is the most appropriate for the Plan period, BDWH would continue to promote the allocation and its subsequent development.



### 3. The planning status of the site

3.1 The site is outside, but adjacent to the development limits of Bryn as defined within the adopted LDP 2006-2021. The site is currently agricultural land (non BMV).

### 4. Financial viability affecting the commencement of development

4.1 As part of the additional site consultation and the evidence which sits behind it, BDWH have undertaken a Financial Viability Assessment (FVA) as the potential developer of the site. This FVA proposes a 160 dwelling site as opposed to the 80 dwelling site considered appropriate by the Council.

4.2 The FVA was appraised by Burrows Hutchinson Ltd. The forecast development profit shown within the 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. The sums allowed in the FVA for s.106 obligations were not all officially confirmed by the Council but, in total, they exceed the allowances made for s.106 obligations in my Countywide high-level viability assessments; and are also greater (in £/dwelling) than the allowances that have been made for s.106 obligations in any of the other “key site” FVA’s. Burrows Hutchinson Ltd were satisfied that the site value indicated is sufficient to encourage the landowner in this case to release the land for the proposed development.

#### **Council position**

4.3 The Council requested a FVA to be undertaken on an 80-dwelling site in conjunction with an appropriate development considered. In terms of the physical infrastructure costs, these are typically low given the nature of the green field site, and the proposal would have

low values for abnormal costs, similar to that for the 160-dwellings site. The Council considers that a smaller development would allow for a policy compliant scheme.

## 5. Site ownership and access constraints affecting site assessment or the commencement of development

5.1 BDWH have secured an option for the site with the landowner and 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.

5.2 There are no direct constraints in regard to obtaining access to the site, with the highway officer commenting that there is some 10m width (including verges) at the track between 29 and 31 Heol y Mynydd for a compliant access subject to detailed design.

## 6. Infrastructure provision necessary to support / enable the development

6.1 Any proposed planning application on the site would need to consider the following. This list is not exhaustive.

- Ground levels
- Disposal of foul and surface water.
- Utility Services
- Drainage Strategy
- Open Space
- Green and Blue Infrastructure
- Landscape and Ecological Design Scheme, and Management Plans
- Construction Environmental Management Plan
- External Lighting
- Investigating ground conditions
- Highway designs, including access and visibility, parking and turning facilities, Active Travel, footpaths.

## 7. The landowner's delivery intentions and trajectory

### Council Position

7.1 In considering BDWH's response to the additional site consultation, the following anticipated completions rate is set below. The Council's position is based on an 80-dwelling site. Following the adoption of the Plan within the 2025/26 period BDWH consider a period of 18 months to secure planning permission and to discharge conditions. They propose a development period of up to 24 months.



Dates	2027/28	2028/29
Anticipated Completions	40	40

## BDWH Position

7.2 BDWHs' position is based on the intention to develop a 160-dwelling site. Following the adoption of the Plan within the 2025/26 period, BDWH consider a period of 18 months to secure planning permission and to discharge conditions. They propose a development period of 48-60 months to complete a 160 dwellings site and a consequential amendment to the housing trajectory.

Dates	2026/27	2027/28	2028/29	2029/30	2030/31
Anticipated Completions	20	40	40	40	20

## 8. Signatories to the Statement of Common Ground

8.1 Carmarthenshire County Council ("The Local Planning Authority"), Boyer Planning and Barratt David Wilson Homes consider that the inclusion of the site as a potential allocation is sustainable, viable and deliverable. Matters relating to areas of common ground, and areas which are not agreed are set out within the preceding chapters.

<b>Signed on behalf of The Local Planning Authority</b>	<i>Ian R Llewelyn</i>
<b>Name</b>	Ian Llewelyn
<b>Position</b>	Strategic Policy and Placemaking Manager
<b>Date</b>	20/06/25

<b>Signed on behalf of The Landowner</b>	<i>Cai Parry</i>
<b>Name</b>	Cai Parry
<b>Position</b>	Senior Land Manager (BDWH)
<b>Date</b>	24/06/2025

# **Carmarthenshire Revised Local Development Plan 2018-2033**

Land at Pontarddulais Road

Statement of Common Ground  
between Carmarthenshire County Council and  
Johnson Brothers, the Landowner

**Date 12 May 2025**

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## 1. Purpose of this Statement of Common Ground

1.1 This Statement of Common Ground (SoCG) has been prepared by two parties to address issues of deliverability in respect of the development at Land at Pontarddulais Road shown edged in red in Appendix 1.

1.2 It addresses the following deliverability indicators:

- The planning status of the site.
- Any progress being made towards the submission of application(s) required to be granted before development may lawfully commence.
- Any progress with site assessment work required for an application submission and / or before development may lawfully commence.
- Any relevant information about financial viability affecting the commencement of development.
- Any relevant information about site ownership and potential constraints affecting site assessment or the commencement of development.
- Any relevant information about infrastructure provision necessary to support / enable the development.
- The landowner's delivery intentions and anticipated start and build out rates.

1.3 For the purpose of this Statement Carmarthenshire County Council is "The Local Planning Authority" and Johnson Brothers are "The Landowner".

## 2. The planning status of the Site

2.1 The subject site of 1.88ha is proposed as an additional housing land allocation for 60 dwellings in the Deposit Revised Local Development Plan, reference SeC7/(i).

2.2 A candidate site submission was received during the invitation for candidate sites stage of the Revised LDP process in 2018. The candidate site submission comprised a much larger area proposed for mixed use. It is not the Council's intention to allocate the whole of the mixed use development as submitted, however the housing element of the scheme is broadly the same as the area proposed in this additional housing allocation.

2.3 The whole mixed use site, as submitted, has been identified as a reserve site in the Second Deposit Revised LDP under Policy SG2. This was in recognition of the site's potential strategic contribution incorporating employment and residential based proposals within the context of Swansea Bay and Llanelli's position within the emerging National Development Framework. However, the intention for reserve sites was that they be released for development only if the allocated sites failed to contribute as expected to the delivery of the Plan's strategy, therefore this site was not allocated as a mixed use site.

2.4 Circumstances have now changed and the need for additional housing sites in the Plan has elevated the status of the housing element of the scheme. The site's position

immediately adjacent to the built form of Llangennech makes it a logical extension of the settlement in terms of housing provision.

### 3. Progress being made towards the submission of application(s)

3.1 None to date. Progress is very much dependent upon the site being allocated in the Revised LDP, after which the Landowner fully intends to submit a planning application and develop the site within the Plan period (and specifically within the trajectory set out below).

3.2 Discussions have already taken place with a number of developers – both in the private and public sector – and following adoption of the Plan, it is the intention to submit a planning application within 3 months of this date. It is anticipated then that construction site will commence within 6 months of any planning permission granted by the Authority.

### 4. Relevant site assessment work required for an application submission

4.1 In support of their candidate site submission, the Landowner/Agent undertook the following assessments which accompanied the submission (in the context of the overall mixed use site referred to under section 2 above):

- Transport statement
- Ecological Appraisal Report
- Supporting Statement
- Masterplan

4.2 Whilst these pieces of evidence are now somewhat dated (2018), they nevertheless indicate the Landowner's commitment to developing the site, and will form a useful starting point towards the subsequent work required in the submission of a detailed planning application, should the site be deemed appropriate for inclusion as a housing allocation in the Revised LDP.

### 5. Financial Viability

5.1 At the request of the Council, a Development Viability Model has been completed and submitted for the development of the additional allocation. As can be seen from the submitted Development Viability Model, the development of the alternative allocation will be delivered at a level that is considered to be financially viable. 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.

## 6. Site ownership and / or potential constraints

6.1 The freehold of the land is owned by Johnson Brothers.

6.2 There are no access constraints affecting delivery of the site. Reference is made to the following technical information that has been provided by the local highways authority:

### Transport:

With most of the site's north-western boundary fronting Pontarddulais Road (based on the assumption that there is not a strip of third party land between the site and Pontarddulais Road), it is likely that a compliant access junction could be constructed to serve a residential development of C.60 dwellings. However, given existing peak period congestion issues along the surrounding road network, including Pontarddulais Road, the Talyclun Traffic Signals and the A4138 through to M4 Junction 48 a Transport Assessment (TA) would need to support any forthcoming planning application. From an operational perspective, the TA would need to:

- consider existing traffic queues along the Pontarddulais Road approach to the Talyclun Traffic Signals (A4138 / Pontarddulais Road) in the context of the development proposals under consideration;
- address likely constraints to traffic wanting to turn right out of the development during both the AM and PM Peak periods; and
- consider improvements to the surrounding road network as appropriate

6.3 In addition to the advice on highway and access issues noted above, technical advice has also been acquired on the following:

- **Flood Risk**  
Less than 1% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3). The site has previously been considered as part of the 2019 SFCA, and the small part considered as an additional site has no flood risk concerns.
- **Ecology**  
No underlying constraints. The County Ecologist has noted that any subsequent planning application would be subject to a survey (grassland and scrub), and that buffers would be required for the trees present.
- **Mineral Safeguarding**  
High Specification Aggregate (Sandstone) deposits underlie part of the site, however the resource at this location is considered to be already largely sterilised as it is within 200m of sensitive development (residential).
- **Coal Authority Data**  
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.

## 7. Infrastructure provision

7.1 The site is within close proximity to local facilities in Llangennech. The site also enjoys good access to public transport routes, including close proximity to Junction 48 of the M4 motorway and Llangennech Railway Station. Llangennech County Primary school lies within easy walking distance from the site. The site therefore represents a sustainable and strategically located site for future housing development.

## 8. The landowner's delivery intentions and anticipated start and build out rates

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
<b>Anticipated Completions</b>	0	0	0	15	15	15	15	0	0	0

## 9. Deliverability Assessment

9.1 Based on the above information, it is considered that there is clear evidence that the site is deliverable within the timescales set out in the Deposit Plan's Housing Trajectory.

9.2 The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

## 10. Signatories to the Statement of Common Ground

Carmarthenshire County Council (“The Local Planning Authority”) and Johnson Brothers consider that the allocation is sustainable, viable and deliverable.

<b>Signed on behalf of The Local Planning Authority</b>	<b>Ian R Llewelyn</b>
<b>Name</b>	<b>Ian R Llewelyn</b>
<b>Position</b>	<b>Strategic Policy and Placemaking Manager</b>
<b>Date</b>	<b>12<sup>th</sup> May 2025</b>

<b>Signed on behalf of The Landowner</b>	<i>Jason D Evans</i>
<b>Name</b>	<b>Jason Evans of Evans Banks Planning Ltd</b>
<b>Position</b>	<b>Director</b>
<b>Date</b>	<b>12<sup>th</sup> May 2025</b>



## Appendix 1

### Location Plan

Enw'r Safle / Site Name:

Tir oddi ar Heol Pontarddulais / Land off Pontarddulais Road

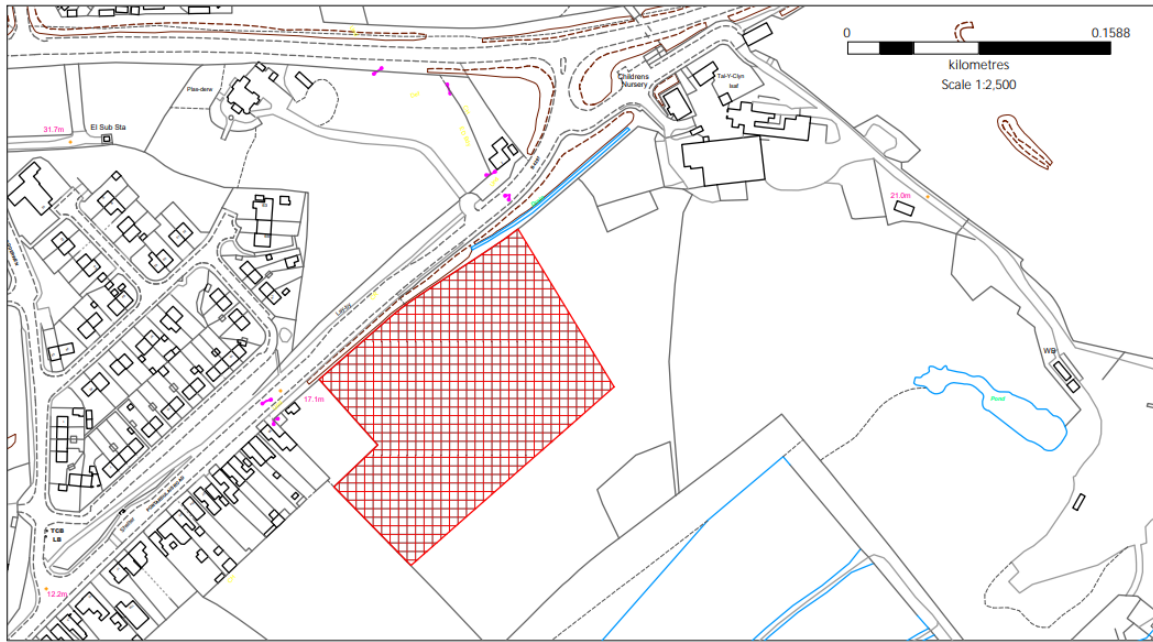
Anheddiad / Settlement: Llangennech

Cyf. Ymgynghori / Consultation Ref.: Sec7(i)

Lle a Chynaliadwyedd.

Lle, Seilwaith a Datblygu Economaidd.  
3 Heol Spilman, Caerfyrddin. SA31 1LE

Place and Sustainability,  
Place, Infrastructure and Economic Development.  
3 Spilman Street, Carmarthen. SA31 1LE



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# Statement of Common Ground between Carmarthenshire County Council “The Local Planning Authority” and Parc Emlyn Development Ltd “The Landowner”.

**Site Address:**

Emlyn Brickworks

**Planning Reference(s) / Local Plan Reference(s):**

Deposit LDP Reference – PrC3/MU1

**Date:**

29 May 2025

## Purpose of this Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared by two parties to address issues of deliverability in respect of the development at **Emlyn Brickworks, Penygroes** shown in Appendix 1.

It addresses the following deliverability indicators:

1. The planning status of the site.
2. Any progress being made towards the submission of application(s) required to be granted before development may lawfully commence.
3. Any progress with site assessment work required for an application submission and / or before development may lawfully commence.
4. Any relevant information about financial viability affecting the commencement of development.
5. Any relevant information about site ownership and access constraints affecting site assessment or the commencement of development.
6. Any relevant information about infrastructure provision necessary to support / enable the development.
7. Expected delivery and build-out rates.

For the purpose of this Statement Carmarthenshire County Council is “The Local Planning Authority” and Parc Emlyn Developments Ltd is “The Landowner”.

In the interests of clarity, this SoCG relates solely to the allocation as defined within the Second Deposit Revised LDP minus a small area owned by a separate party accessed off Waterloo Road, Penygroes. Nor does it relate to any other additional land being promoted



by The Landowner as part of the Revised LDP process. The precise area covered by the SoCG is outlined in red in Appendix 1 below.

**1. The planning status of the site.**

The subject site of 10.28 hectares is a previously developed site and has been included in the Second Deposit Revised LDP for mixed use purposes under site reference PrC3/MU1. Provision is made for the delivery of community focused development, along with 177 new homes. It is proposed to increase the housing provision on the site by 50 dwellings and allocate the site for community focused development and 227 dwellings to increase the housing supply within the Revised LDP in response to matters raised by the Inspector during the Revised LDP's Examination.

Part of the wider site, off Norton Road, has already been developed for nine homes. This was developed prior to the plan period and so does not form part of allocation PrC3/MU1 within the Revised LDP.

Full planning permission was granted on 26 July 2023 for 70 homes on Phase II (land between Norton Road and the Cross Hands Economic Link Road spur to Norton Road) (Council planning application reference number E/32720). This permission covers 2.2ha of the overall mixed use allocation in the Second Deposit Revised LDP.

Recent completion of the Cross Hands Economic Link Road adds to the accessibility and deliverability of this site.

Further information on the planning status is outlined below.

**2. Any progress being made towards the submission of application(s) required to be granted before development may lawfully commence.**

A non-material amendment (registered 14/4/24) was granted in relation to permission E/32720 on 3/3/25 to allow for the phased discharge of conditions.

An application under section 73 (registered 11/10/24) seeks permission for the phased discharge of conditions and the approval of details required by some conditions.

Submission of another application under section 73 for revisions to the approved house types and site layout, for the phased discharge of conditions and for approval of details required by some conditions is expected in summer/autumn 2025.

**3. Any progress with site assessment work required for an application submission and / or before development may lawfully commence.**

Site inspections and survey work have been carried out to prepare the reports required as part of planning application E/32720. Importantly the Landowner addressed the concerns of Natural Resources Wales (NRW) in respect of ecology and land contamination. The following reports were submitted with the planning application and are available to view on the Council's website:

- Preliminary Ecological Appraisal
- Drainage Report
- Written Scheme of Investigation for an Archaeological Watching Brief
- Phase 1 Habitat Study of Site and Wider Area
- Design and Access Statement
- Topographical Survey
- Assessment of Mining Subsidence Risk

Geotechnical surveys, to assess for ground contamination, permeability and ground stability, took place in January 2024, with some monitoring continuing until the end of March 2024. This survey work will inform the discharge of planning conditions, the design of the foundations for the houses and other ground work.

Whilst there are no specific dates identified for submitting a planning application for the remaining part of the site, the Landowner's commitment to deliver the whole of their site is evident through the submission of a representation to the Second Deposit Revised LDP.

The representation includes land not covered by the proposed allocation as identified in the second deposit revised LDP. However, The Landowner promoted the wider site throughout the preparation of the revised LDP and during its Examination. During discussions at the public examination's hearing sessions, it was agreed that it would be appropriate to expand the allocation to include the wider site within the revised LDP resulting in an allocation measuring 18.7ha. As such, the Inspector issued The Local Planning Authority with an action point to enlarge the proposed site area. This amendment along with all other 'Matters Arising Changes' will be subject to public consultation. However, given that this consultation has not yet taken place the area of land outside of the allocation identified in the Second Deposit revised LDP lies outside the scope of the SoCG.

The representation includes the following supporting documents/studies covering the whole allocation, and where relevant support the deliverability of the allocation:

- Initial Masterplan of the Site
- A Detailed Technical Report covering:
  - Previous Investigations
  - Coal Mining Risk Assessment
  - Geotechnical considerations



- Conceptual Site Model and Preliminary Ground Contamination Risk Assessment
- Phasing Plan (from previous reports)
- Site Constraints Plan
- Map of Peat Deposits

**4. Any relevant information about financial viability affecting the commencement of development.**

Financial viability relating to phase 2 of the development has been addressed in planning permission E/32720.

A viability appraisal utilising a recognised Development Viability Model on the remaining elements of the site has been prepared by The Landowner. This has been appraised by Burrows-Hutchinson Ltd on behalf of the Council and their assessment found that the remaining phases of the sites, not currently benefitting from planning permission, would be economically viable and capable of delivering 25% affordable dwellings in line with Policy AHOM1 in the rLDP.

**5. Any relevant information about site ownership and access constraints affecting site assessment or the commencement of development.**

**Ownership**

The freehold of the majority of the land is owned by Parc Emlyn Developments Limited.

**Access**

Vehicular access to the site will be directly off the new Cross Hands Economic Link Road, as shown in the initial masterplan submitted as part of the representation to the Second Deposit LDP. This new road provides a more efficient vehicle link to the Cross Hands business hub and to the main A48 east-west trunk road (and M4) and by-passes the 6-way junction at Gorslas which had been the source of congestion in the past. Access to phases 1 & 2 is already in place via Norton Road in the north (as indicated in planning permission E/32720).

Development of the site will help facilitate delivery of the Cross Hands to Llandybie shared-use path, helping to deliver a cycle route largely segregated from vehicular traffic. See accompanying Carmarthenshire Council drawing DE-02 Rev C 'Scheme Plan with Topographical Survey'.

**Accessibility**

There are a number of community based facilities in close proximity to the development which serve the village of Penygroes, a GP surgery and accompanying pharmacy, community centre and library. There are a number of schools within the local vicinity, Penygroes and Gorslas primary schools lie within approximately 1 mile of the scheme and the recently upgraded and extended Maes-y-Gwendraeth secondary school is situated approximately 2



miles away in Gorslas. Penygroes park is situated in close proximity to the south providing access to recreational fields, play area and sports hall. The developer also has ambitions to provide on site amenity space in the form of public open spaces, this will form part of the overall master planning for the site.

**6. Any relevant information about infrastructure provision necessary to support / enable the development.**

Issues relating to Phase 2 of the site (application E/32720 for 70 dwellings) have been addressed during the determination of the application.

In terms of the remainder of the site, representations were received in respect of the allocation in the Second Deposit Revised LDP and the Additional Sites consultation from Dŵr Cymru/Welsh Water (DCWW) and NRW. We consider below responses from DCWW and NRW in relation to the uplift in housing numbers, which demonstrate that subject to further work at planning application stage and subject to conditions and agreements imposed upon subsequent planning permissions, there are no outstanding objections:

**DCWW**

*Water supply: A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water network and potential developers would be expected to fund investigations. The findings of the HMA would inform the extent of any necessary water infrastructure upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended).*

*Public Sewerage: The site lies in close proximity to Garnswllt, Pontyberem, and Cwmgwili WwTW catchment areas. There are various potential points of connection to the public sewers that lead to different WwTW catchment areas. We will be able to assess the impact on the network once further detail is available.*

*Wastewater Treatment Works: The site lies in close proximity to Garnswllt, Pontyberem, and Cwmgwili WwTW catchment areas. There are various potential points of connection to the public sewers that lead to different WwTW catchment areas. We will be able to assess the impact on the network once further detail is available.*

**NRW**

*50 units. Contaminated Land, Preliminary Risk Assessment Required. NRW provided comments on application ref E/32720. Speak to the LPA ecologist regarding species surveys, welsh water sewerage catchment.*

**Impact on the Community/Welsh Language** - A scheme at this location will provide a range and choice of house types and tenures, including affordable elements. It is not considered that the development of the site for housing will have any significant adverse impact upon the Welsh language or any local communities.

**7. The landowner's delivery intentions and anticipated start and build-out rates:**

A small part of the overall allocation PrC3/MU1 is owned by a separate landowner and does not form part of this SoCG. The anticipated 17 dwellings being proposed by a third party for that land, does not form part of the housing trajectory set out in the table below.

The table below is adapted from the Deposit Plan's Housing Trajectory set out in Appendix 7 of the Deposit Plan (minus the 17 dwellings on the part not covered in this SoCG):

Timescale (Years)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33
Number of Dwellings Completed	0	0	30	30	30	30	30	30	30

Subject to the planning permission approved in July 2023, for 70 dwellings, the initial dwelling completions for this phase is set out from 2026-29 above. The planning permission for the balance of the dwellings on the site will be sought before the end of 2026. It can be confirmed that the site will be developed within the timescales set out above.

Further updates can be provided as a future planning application and delivery of the site progresses.


**Deliverability Assessment**

Based on the above information, it is considered that there is clear evidence that the site is deliverable within the timescales set out in the Deposit plan's Housing Trajectory.

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

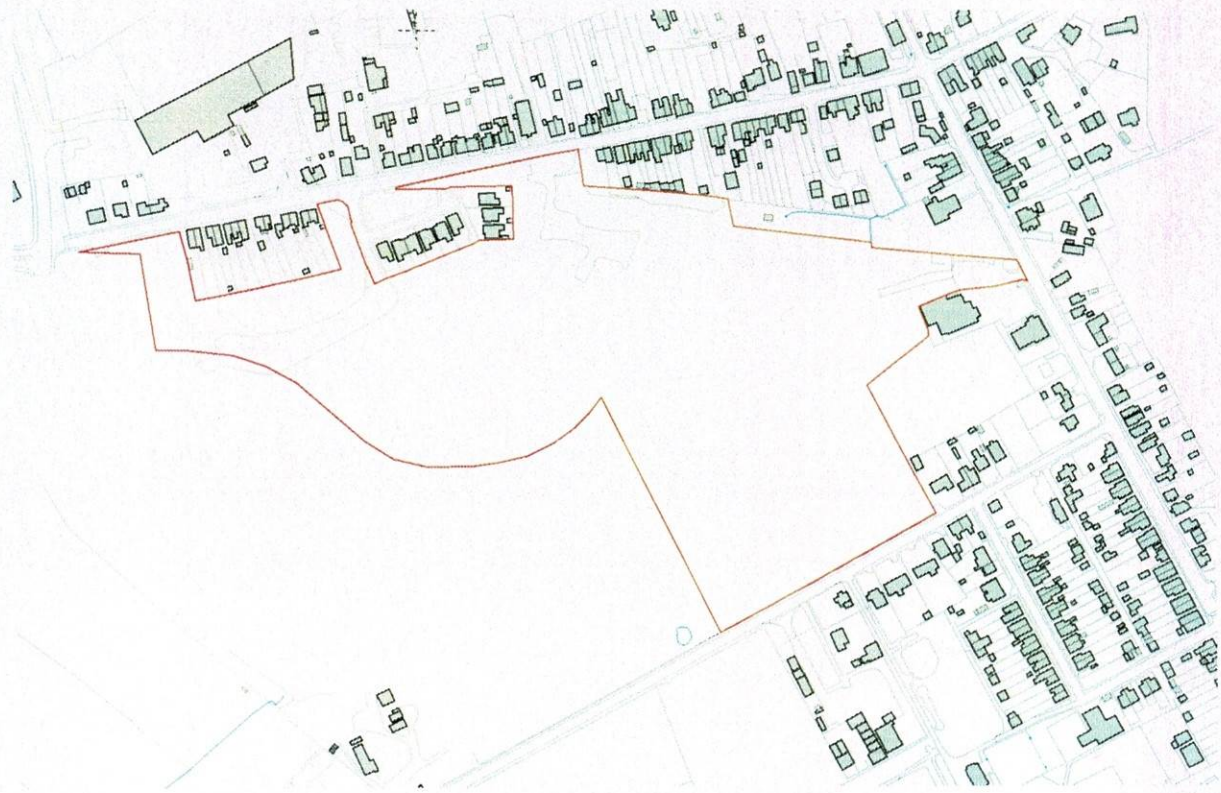
<b>Signed on behalf of The Local Planning Authority</b>	
<b>Name</b>	<i>Ian R Llewelyn</i>
<b>Position</b>	Strategic Policy and Placemaking Manager
<b>Date</b>	29th May 2025



Signed on behalf of The Landowner	
Name Colum Carty on behalf of Parc Emlyn Developments Ltd	
Position Director	
Date 29 <sup>th</sup> May 2025	



## Appendix 1 Site Location and Context



Area covered by this SoCG outlined in red.

# **Carmarthenshire Revised Local Development Plan 2018-2033**

PrC3/(ix) Land at 1<sup>st</sup> Stop Recycling, Cefneithin  
Road, Gorslas

Statement of Common Ground  
between Carmarthenshire County Council and  
Mannor Homes Ltd

**May 2025**

# Statement of Common Ground between Carmarthenshire County Council “The Local Planning Authority” and Mannor Homes Ltd

<b>Site Address:</b> Land at 1 <sup>st</sup> Stop Recycling, Cefneithin Road, Gorslas
<b>Planning Reference(s) / Local Plan Reference(s):</b> PrC3/(ix) Breaker’s Yard  The following provides a link to the Pre-Application Consultation in relation to an Outline planning application on the majority of the Site <a href="#">1st Stop Recycling, Gorslas — Asbri Planning</a>
<b>Date:</b> 30 May 2025

## Purpose of this Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared jointly by the Local Planning Authority at Carmarthenshire County Council (‘the Council’) and Mannor Homes Ltd (‘Landowner’) in respect of land at 1<sup>st</sup> Stop Recycling, Cefneithin Road, Gorslas (‘the Site’). The SoCG is intended for submission as part of the ongoing Carmarthenshire Revised Local Development Plan (LDP) process.

The purpose of this SoCG is to set out an agreed position regarding the proposed allocation of the Site for residential development in the Revised LDP (Site Ref: PrC3/(ix)).

In the interest of clarity, this SoCG relates solely to the proposed housing allocation (Site Ref: PrC3/(ix)) as defined by the red line on the location plan contained within Appendix 1. The Site itself extends to some 3.16ha in area, and is indicatively proposed to accommodate circa 80 residential units. The wider adjacent land in the Landowner’s ownership is shown in blue on the location plan, and is 3.93ha in area. Both NRW and CCC Ecology responses, which are referenced later in this statement acknowledge the potential that this wider land holding has for habitat restoration for marshy grassland and supporting habitats for Marsh Fritillary butterfly. In this regard it is suggested that a management agreement with the Caeau Mynydd Mawr Marsh Fritillary project could be explored.

The SoCG addresses the following deliverability indicators:

1. The planning status of the site.
2. Any progress being made towards the submission of application(s) required to be granted before development may lawfully commence.
3. Any progress with site assessment work required for an application submission and / or before development may lawfully commence.
4. Any relevant information about financial viability affecting the commencement and delivery of the Site’s development.

5. Any relevant information about site ownership and access constraints affecting site assessment or the commencement and delivery of the Site's development.
6. Any relevant information about infrastructure provision necessary to support / enable the commencement and delivery of the Site's development.
7. The Landowner's delivery intentions and expected delivery and build-out rates.

## 1. The planning status of the site

1.1 The Site consists of an established recycling facility, which continues to have a valid operator's licence. The site currently comprises an area of hard standing with 2 existing buildings associated with its previous recycling activities. The remaining parts of the site comprise marshy grassland, scrub and woodland. Much of the Site is therefore considered to be brownfield, previously developed land. The established use at the site is not compatible with the prevailing surrounding residential land uses.

1.2 The majority of the Site is located within the defined 'development limits' and forms part of a housing allocation (GA3/h44) in the adopted LDP. The eastern section of the existing housing allocation has already been built out and the site's development would serve as a logical extension of the residential built form at this part of Gorslas. The Site is situated within the defined Ammanford/Cross Hands 'Growth Area', the highest tier of settlement within the existing adopted LDP settlement framework, now recognised as a 'Principal Centre' in the revised LDP.

1.3 It is proposed to retain and extend the existing housing allocation as part of the Revised LDP. The extended area to the south does not extend beyond the southernmost part of the existing Adopted LDP allocation to the east, which as aforementioned has been built out. The Site extends to some 3.16ha in total and is indicatively identified for 80 residential units allowing for key placemaking and green infrastructure principles to be achieved, whilst ensuring that a financially viable scheme can be developed.

## 2. Any progress being made towards the submission of application(s) required to be granted before development may lawfully commence.

2.1 The majority of the Site has been subject of a Pre-Application Consultation. The 28 day consultation period ran from the 21<sup>st</sup> February to 21<sup>st</sup> March, 2025 and can be viewed at [1st Stop Recycling, Gorslas — Asbri Planning](#).

## 3. Any progress with site assessment work required for an application submission and / or before development may lawfully commence.

3.1 A significant amount of site assessment work has been undertaken to inform the PAC and future Outline planning application which is subject to PAC, and can be viewed at [1st Stop Recycling, Gorslas — Asbri Planning](#)

### Highways, Parking and Transport

3.2 An appropriate access to the Site with good visibility in both directions can be achieved directly off Cefneithin Road to the north. This section of Cefneithin Road is subject to a 20mph speed restriction.

3.3 A Transport Statement has been prepared by LvW Highways in support of the PAC. It demonstrates that the site is in an inherently sustainable location closely related to a range of services and facilities in Gorslas and Cross Hands.

3.4 The Site is well positioned in relation to public transport routes with bus stops nearby. In respect of active travel the site benefits from excellent pedestrian infrastructure with pavements lining both sides of Cefneithin Road. Cefneithin Road is identified as a future shared use route within the Council's Active Travel Map. The site is located approximately 900 metres east of the National Cycle Route 47.

3.5 In their consultation response, the Local Highway Authority raise no objection to the site's allocation. They opine that the access proposals for the development are appropriate, and given that the development would generate fewer trips than the site's established use (as a metals recycling yard) with a significant reduction in heavy good vehicle movements along the surrounding road network there is no adverse implications in terms of highway safety. The sustainability credentials of the site are also acknowledged noting that the site connects to existing pedestrian and cycle facilities on the surrounding network and that the internal layout of the site, shown indicatively at this stage, would be designed to give maximum encouragement to walking and cycling.

### **Drainage and Flood Risk**

3.6 In terms of flood risk, a review of Natural Resources Wales Flood Map for Planning indicates the site is unconstrained by flood risk from rivers and sea. There are areas of flood zone 2 and 3 in respect of surface water and small watercourses to the south but do not pose a constraint to site development. NRW's response to Additional Sites consultation and the PAC raises no concerns in relation to flood risk.

3.7 A Drainage Strategy has been prepared in relation to the PAC. The proposed development will be served by separate foul and surface water drainage systems.

3.8 Dŵr Cymru/Welsh Water has confirmed that no problems are envisaged with the Waste Water Treatment Works and therefore foul flows from the proposed development can be accommodated within the public sewerage system.

3.9 In terms of surface water, detailed design of the proposed surface water system will need to comply with Welsh Government's Statutory Standards for sustainable drainage systems, and be approved by Carmarthenshire County Council acting as the Sustainable Urban Drainage System Approving Body (SAB).

### **Air Quality**

3.10 The application site is not located within an Air Quality Management Area. The site has an established industrial use as a recycling facility with associated operations and traffic movements. The removal of this use and its replacement with a compatible residential development will have a positive impact in terms of air quality. No objections have been raised as part of the consultation on the Additional Sites.

### **Noise**

3.11 A Noise Impact Assessment has been prepared in support of the PAC, providing an assessment of the external noise sources, primarily road traffic, in relation to the proposed development.

3.12 The assessment finds with the noted noise control measures implemented into the design of the building, BS8233 criteria can be achieved within the habitable areas of the development. Standard double glazing and trickle vents are compliant with BS8233 criteria for all rooms in all residencies.



3.13 Based on the indicative outline drawings, and noise modelling undertaken, noise levels within all amenity spaces are expected to fall within BS8233 criteria.

3.14 The Site has an established use as a recycling facility. The removal of this use and its replacement with a compatible residential development will have a positive impact in terms of noise. The Environmental Health Division of the Council in their response to PAC did not raise an objection on noise grounds, and advised that they will formally comment at planning application stage.

### **Ecology, biodiversity & trees**

3.15 Carmarthenshire County Council's Constraints Map indicates that the site does not contain any statutory designated ecological sites.

3.16 A significant amount of ecological and arboricultural surveys have been undertaken in relation to the Site and the wider land ownership to establish the baseline position. A further Ecology Note has been prepared on behalf of the Landowner for the purposes of aiding the site's consideration for inclusion within the rLDP. The Note consolidates the findings of the surveys and reports prepared to date and summarises the baseline position. Chapter 5 reflects on the baseline position and identifies how the proposed development may impact upon the site's biodiversity value. Of particular relevance is paragraph 5.8 of the Ecology Note which sets out the stepwise approach in respect of each identified habitat or species on the site. It concludes that all reasonable steps have been taken to maintain and enhance biodiversity and promote the resilience of ecosystems, and these should be balanced with the wider material planning considerations.

3.17 A Preliminary Ecological Appraisal of the Site and the wider land owned by the applicant was undertaken to establish the ecological baseline, identify any ecological constraints, and make recommendations for further survey work. The PEA identifies that the habitats present within the Site and wider area surveyed include broadleaved semi-natural woodland, dense scrub, marshy grassland, ephemeral / short perennial, buildings and bare ground.

3.18 A presence / absence survey for reptiles found a small population of common lizard using the Site. Poor habitat suitability was found over much of the Site. Therefore in terms of mitigation a combination of active reptile and amphibian protection during site clearance, followed by installation of a hibernaculum, and suitable management of a proportion of remaining adjacent habitat is recommended.

3.19 A Marsh Fritillary survey was undertaken. Whilst Devil's-bit Scabious, the larval food plant was found in three small patches within the more accessible areas of the area surveyed, the area occupied by this and other suitable habitat was not considered large enough to support a population. The report therefore recommends that the larger area of contiguous land supporting Purple Moor Grassland is considered for habitat management to provide habitat for Marsh Fritillary. Suitable methods of management would include reduction of areas of scrub, and translocation of Marsh Fritillary host plant species.

3.20 A Dormouse survey of the Site identifies two dormouse nests in the western hedgerow area. As Dormouse have been confirmed present in the western area of the site, and there is good connectivity to woodland, NRW must be consulted and any future works such as vegetation clearance undertaken under EPS licence.

3.21 An Otter survey undertaken identified no signs of Otter on the site but identifies suitable habitat. Some basic precautionary measures are therefore recommended in the site's PEA.

3.22 A Bat scoping and activity survey identified that no Bats were utilising the property, however Bats were detected foraging and commuting. The report recommends a series of bat and bird enhancement measures that can be taken forward as part of detailed design.

3.23 A Badger survey was undertaken which did not identify any Badger setts.

3.24 A National Vegetation Classification (NVC) survey of the Site and wider land holding was undertaken. The Site and wider area contains a number of grassland habitats but the survey noted that much of the former extent of grassland has been reduced as a result of scrub invasion. The Landowner will undertake a further NVC survey of the woodland and scrub areas at the site so that a detailed breakdown of woodland types can be identified and their potential loss quantified. This will be done in support of a future application.

3.25 The site is being affected by a number of negative issues including Himalayan Balsam in the more disturbed areas, scrub invasion and rank Purple Moor-grass caused by lack of grazing, with only around 5% of the habitat still present compared to around 30 years ago. To reverse this, an assessment of the restoration potential has been made. Opportunities to manage and enhance existing habitats to become very high quality, principally the areas of Purple Moor-grass and Rush Pasture have been identified. It also has the potential to improve the habitat for Marsh Fritillary butterfly.

3.26 The Purple Moor-grass and Rush Pasture has already undergone significant loss on the wider land holding in the last 20-30 years from scrub invasion, and without intervention it will be completely lost within the next 20 years. A Marshy Grassland Management Plan could be taken forward that will provide recommendations for future management and maintenance, and assign roles and responsibilities in this regard. Its successful implementation will be secured as part of the formal planning application process.

3.27 An Arboricultural survey of the Site has been undertaken. The main tree constraints identified were individual and group Category B trees to the eastern side of the site. These trees can be respected and accommodated for within scheme layout design, as shown in the site's indicative layout provided in the Ecology Note. The Arboricultural Report undertaken of the indicative scheme stated that the indicative layout retained a high proportion of the higher-value trees. The report concluded that the development proposal will not cause a long-term adverse impact on the local amenity of the area through tree loss, and cause no long term arboricultural impact on the health of any retained trees on or adjacent to this site.

3.28 A significant amount of baseline ecological information in relation to the Site has been gathered which informs the step-wise approach outlined in PPW, which is set out in section 5.8 of the Ecology Note. The more sensitive ecological areas of the Site and higher quality trees can be retained and impact avoided, whilst ecological connectivity networks can be provided. Significant opportunities to manage and improve off Site habitat within the Landowner's control have been identified that will enhance the ecological resource. The Landowner acknowledges that further work will be required at the planning application stage to fully evaluate the woodland types on the site and to quantify the potential loss of semi-natural broadleaved woodland and loss of dormouse habitat and that any loss will need to be suitably compensated for.



3.29 In their response to PAC, Natural Resources Wales do not object to the proposed development, but request further information to be provided in the form an impact assessment, mitigation and conservation strategy for Dormice. They have no adverse comments to make in relation to Otters and Bats. The response acknowledges that the wider land holding provides opportunities to restore marshy grassland and Marsh Fritillary supporting habitats. They also acknowledge that gross contamination has been identified on part of the site, and that the site's remediation in this regard will improve matters from an environmental and sensitivity of controlled waters perspective. Conditions in relation to contaminated land and Construction Environmental Management Plan are recommended.

3.30 The response from the Council's Planning Ecologist opines that the only areas suitable for development are the hardstanding and building areas of the site. Restricting the net developable area of the site to this extent would render a residential scheme on the site unviable. The response acknowledges that the proposed development avoids areas of species rich purple moor grass and rush pastures, but references the loss of semi-natural broad leaved woodland. Whilst the PEA identifies areas of semi-natural broad leaved woodland, a review of historic aerial photographs clearly identifies areas of mature woodland which can be respected as part of a scheme layout, and areas of self-seeded trees and scrub. As aforementioned, a detailed Arboricultural Survey has been undertaken in this regard.

3.31 The Planning Ecologist response also acknowledges the opportunities identified in the NVC Survey to improve marshy grassland and Marsh Fritillary butterfly supporting habitats. In this regard the response suggests that the landowner may wish to enter into a management agreement with the Caeau Mynydd Mawr Marsh Fritillary Project. This is something that the landowner would be amenable to discussing further as part of the site's development.

### Landscaping a green infrastructure

3.29 A Green Infrastructure Statement has been produced to inform the PAC. It considers the significant amount of ecological baseline information gathered to inform scheme design. The Site allows for an appropriate layout to be achieved that respects existing important Green Infrastructure assets, and provides opportunities for green links and connectivity both within the scheme and around its edges that provide ecological connectivity networks with wider immediately adjacent offsite habitat. The successful establishment of a planting scheme and associated biodiversity enhancements will provide a network of healthy, multi-functional and biodiverse green space.

### Archaeology and heritage

3.30 In respect of heritage, the Cadw Designated Heritage Asset map indicates that no listed buildings or scheduled monuments are located within, or adjacent to the site boundary.

3.31 In their responses to the PAC process, both Cadw and Heneb have raised no objection towards the proposed development. Similarly, no objections were received during the Additional Sites consultation.

### Ground conditions & coal mining legacy

3.32 A Ground Investigation Factual and Interpretative Report has been prepared to inform the PAC. The report finds that the former recycling centre area of the Site will require further investigation and will likely require remediation. Outside of this area, the soils sampled were not found to present

an unacceptable risk to the proposed site users or controlled waters, and these areas of the Site may be considered suitable for development without remedial works.

3.33 The consultation responses received from both NRW and Council's Environmental Health Officer in relation to contaminated land do not raise any objection subject to conditions. The requirement for further site investigation works to inform remediation is acknowledged, and suitably worded conditions are recommended. The Landowner acknowledges that further site investigation works and likely a remediation strategy will be required and is committed to producing these in support of a future planning application.

3.33 A Coal Mining Risk Assessment has been prepared to inform the PAC. The assessment finds that there is no shallow underground mining of coal beneath the site. Borehole investigations were undertaken and no further intrusive works will be required. There are no ground instability constraints associated with historic coal mining legacy at the Site, and therefore no engineering or location based mitigation measures are considered necessary. In their response to the PAC consultation, the Coal Authority agree with the conclusions of the report.

#### 4. Any relevant information about financial viability affecting the commencement and delivery of the Site's development.

4.1 The landowner has provided a high-level viability appraisal taking into account the likely mitigation and contributions required. This has been appraised by Burrows-Hutchinson Ltd on behalf of the Council and their assessment found that the development would be economically viable and capable of delivering 20% affordable dwellings in line with Policy AHOM1 in the rLDP.

#### 5. Any relevant information about site ownership affecting site assessments or the commencement and delivery of the Site's development.

The site is currently in the ownership of Mr. Michael Richard John Phillips, who is one of the Directors of Mannor Homes Ltd.

#### 6. Any relevant information about infrastructure provision necessary to support / enable the commencement and delivery of the Site's development.

##### Dŵr Cymru Welsh Water

6.1 In their formal response to the Additional Sites Consultation and the PAC in relation to the capacity of their network assets and infrastructure to accommodate residential development on the Site, DCWW confirm that foul flows can be accommodated within the public sewerage system. No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

6.2 In terms of water supply, the response confirms that capacity is currently available in the water supply system to accommodate the development. A summary of their comments is noted below:  
Water Supply: A water supply can be provided for this site.

Public Sewerage: The public sewerage network can accept potential foul flows from this development site. The site is crossed by a 225mm diameter foul sewer.

Wastewater Treatment Works: The site is in Pontyberem WwTW catchment area. The WwTW has capacity to accept foul flows from the site.

## NRW

6.3 NRW's consultation response has been referred to already in this statement. They have raised no objection to the proposed development subject to the submission of further information on Dormice in the form of an impact assessment, mitigation and conservation strategy, and recommended conditions in terms of contaminated land and CEMP. They also note that further site investigation will be required in relation to the potential for land contamination. A summary of their comments in response to the Additional Sites Consultation is noted below:

The respondent provided the following commentary: 80 units. Potential contaminated Land, Preliminary Risk Assessment Required. We recommend you seek the advice of your Local Authority's Planning Ecologist to determine if there is a reasonable likelihood of protected species being present within the site and to determine whether surveys are required. Otter surveys may be required. welsh water sewerage catchment. Cernydd Carmel SAC and Caeau Mynydd Mawr SAC approximately 1.5km away.

## Carmarthenshire Highways and Transport Department

6.4 The consultation response from the Local Highway Authority has also already been referenced in this statement. They raise no objection.

## Impact on the community/Welsh Language

6.5 The Site's allocation and development for residential will remove a non-conforming industrial operation from a residential area, and will provide a range and choice of house sizes, types and tenures (including affordable housing).

## 7. The landowner's delivery intentions and anticipated start and build-out rates:

7.1 The table below shows the proposed delivery trajectory for the Site.

Timescale (Years)	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033
Number of Dwellings Completed	Facilitating and infrastructure works to be carried out and 5 dwellings completed	Facilitating and infrastructure works to continue and 10 dwellings to be completed	20	20	15	10	0

7.2 As aforementioned, the Site is informed by significant site assessment work and the majority of the site has recently been subject to the formal PAC process. The Viability appraisal referenced earlier in this SoCG for a circa 80 unit scheme has evidenced that a market led scheme with policy compliant affordable housing and S.106 contributions is viable.

7.3 Based on the information set out in this SoCG and the Landowner's clear commitment to cease the Site's established use as a recycling facility and progress a residential development on the site, it can be confirmed that the site will be developed within the timescales set out above.

7.4 Further updates can be provided as the delivery of the site progresses.

### Deliverability Assessment

7.5 Based on the information contained in this SoCG, it is considered that there is clear evidence that the Site's housing allocation PrC3/(ix) is deliverable within the timescales set out in the above Housing Trajectory.

7.6 The allocation of the Site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology and a detailed Site pro forma has been prepared. The allocation is considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the Revised LDP makes sufficient provision for part of the housing needs of this settlement.

## 8. Signatories to the Statement of Common Ground

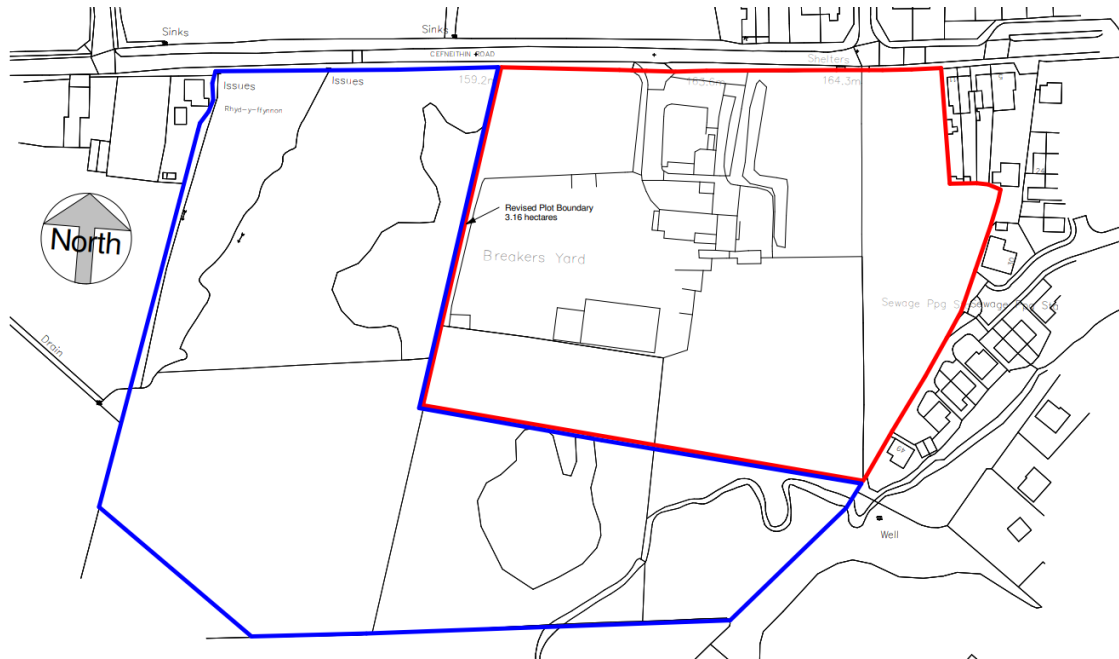
Carmarthenshire County Council (“The Local Planning Authority”) and Mannor Homes Ltd consider that the allocation is sustainable, viable and deliverable.

<b>Signed on behalf of The Local Planning Authority</b>	<i>Ian R Llewelyn</i>
<b>Name</b>	<b>Ian Llewelyn</b>
<b>Position</b>	<b>Strategic Policy and Placemaking Manager</b>
<b>Date</b>	<b>30th May 2025</b>

<b>Signed on behalf of Mannor Homes Ltd</b>	
<b>Name</b>	<b>Rob Davies</b>
<b>Position</b>	<b>Associate at Asbri Planning</b>
<b>Date</b>	<b>30<sup>th</sup> May, 2025</b>

## Appendix 1 Location Plan

Housing allocation PrC3/(ix)



# **Carmarthenshire Revised Local Development Plan 2018-2033**

Land at Monksford Street, Kidwelly

Statement of Common Ground  
between Carmarthenshire County Council and  
David Lloyd George Developments Ltd.

**May 2025**

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## 1. Purpose of this Statement of Common Ground

1.1 This Statement of Common Ground (SoCG) has been prepared by Carmarthenshire County Council (CCC) in collaboration with David Lloyd George Developments Ltd. The SoCG has been prepared as evidence for the Examination of the Revised LDP and as part of the Council's requirement to find additional sites for inclusion in the Plan. This statement will set out matters agreed between the parties and will include the most up to date information available that is relevant to the site's development.

## 2. The Site

2.1 The application site is an approximately 4.2ha parcel of land between Monksford Street, Stockwell Lane and Priory Street. The site fronts onto Monksford Street with an 82m road frontage opposite the existing Co-op store. The site is greenfield, currently grazed within well-defined boundaries including hedgerow and mature trees. Houses in Stockwell Lane overlook the site from the southwest at a slightly elevated position. The site is a shallow bowl topographically with the ground rising towards Stockwell Lane and Priory Street.

2.2 A location plan is shown in Appendix 1 of this Statement.

## 3. The planning status of the site

3.1 The site is currently allocated within the adopted LDP for residential development under reference T3/3/h3. The allocation in the adopted LDP is larger than that considered as part of the additional site consultation for this Revised LDP and is allocated for 95 dwellings.

3.2 An outline planning permission was granted in August 2022 for the proposed residential development with some matters reserved.

## 4. Financial viability affecting the commencement of development

4.1 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.

## 5. Site ownership and access constraints affecting site assessment or the commencement of development

5.1 The site is owned by David Lloyd George Developments Ltd. The access arrangement was considered as part of the approved outline planning permission therefore there is not considered to be any insurmountable constraints impacting the development of the site.

## 6. Infrastructure provision necessary to support / enable the development

6.1 The outline planning permission sets out a number of planning conditions which will need to be considered as part of any reserved matters applications 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.

## 7. The landowner's delivery intentions and trajectory

7.1. The landowner has confirmed that their Planning, Ecology and Design consultants are currently working up an application for the submission for the approval of Reserved Matters for the site prior to the expiration of 3 years since the outline planning permission. This is due to be submitted by the 30<sup>th</sup> June 2025.

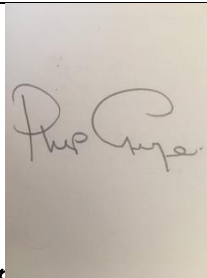
7.2 The housing phasing and timing of the development is presented below to the Inspectors as part of the additional site exercise.

Dates	2027/2028	2028/2029	2029/2030	2030/2031
Anticipated Completions	20	20	20	10

## 8. Signatories to the Statement of Common Ground

8.1 Carmarthenshire County Council ("The Local Planning Authority") and David Lloyd George Developments Ltd consider that the inclusion of the site as a potential allocation is sustainable, viable and deliverable.

<b>Signed on behalf of The Local Planning Authority</b>	<i>Ian R Llewelyn</i>
<b>Name</b>	<b>Ian Llewelyn</b>
<b>Position</b>	<b>Strategic Policy and Placemaking Manager</b>
<b>Date</b>	<b>27/05/25</b>

<b>Signed on behalf of The Landowner</b>	
<b>Name</b>	<b>Philip George</b>
<b>Position</b>	<b>Director – David Lloyd George Dev Ltd</b>
<b>Date</b>	<b>27<sup>th</sup> May 2025</b>

## Appendix 1

## Location Plan

Enw'r Safle / Site Name:

Tir oddi ar Heol Rhydymynach / Land off Monkford Street

Anheddiad / Settlement: Cydweli / Kidwelly

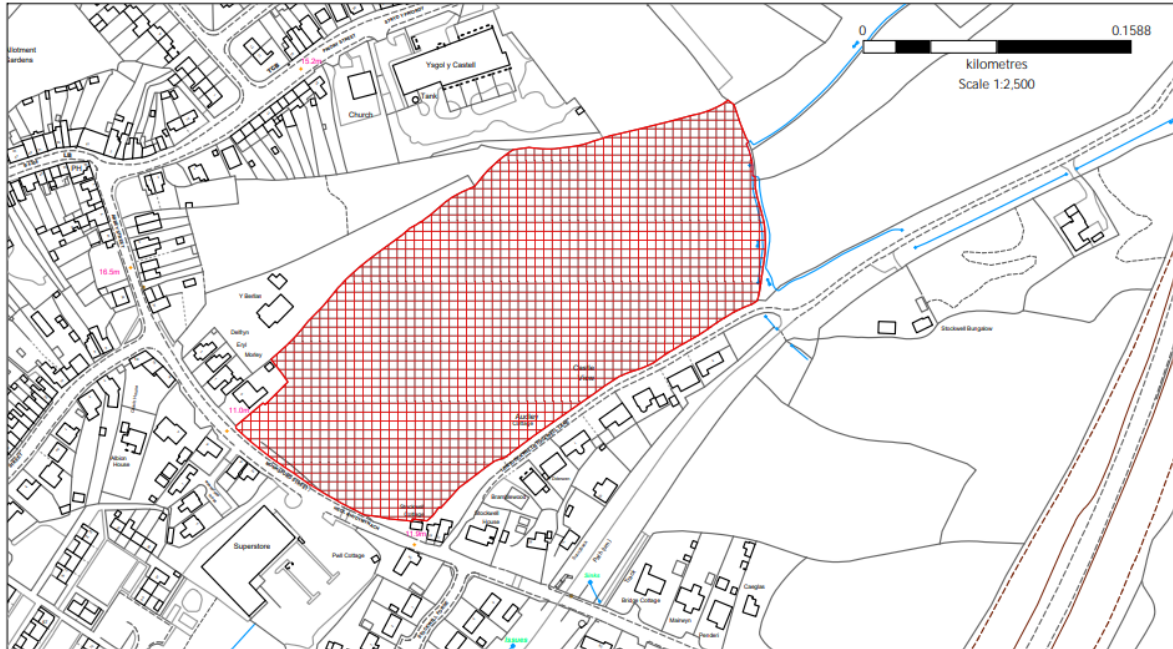
Cyf. Ymgynghori / Consultation Ref.: SeC3/(ii)

Lle a Chynaliadwyedd.

Lle, Seilwaith a Datblygu Economaidd.  
3 Heol Spilman, Caerfyrddin. SA31 1LE

### Place and Sustainability.

Place, Infrastructure and Economic Development.  
3 Spilman Street, Carmarthen. SA31 1LE



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# **Carmarthenshire Revised Local Development Plan 2018-2033**

**SeC19/(i) Land Adjacent to the Beeches,  
Whitland**

**Statement of Common Ground between  
Carmarthenshire County Council “The Local  
Planning Authority” and Asbri Planning Ltd “The  
Agent” acting on behalf of Pobl Group**

**May 2025**

# Statement of Common Ground

<b>Site Address:</b> Land Adjacent to the Beeches, Whitland.
<b>Planning Reference(s) / Local Plan Reference(s):</b> Revised LDP Additional Sites Consultation Reference - <b><u>SeC19/(i)</u></b> Outline Planning Application Reference - <b><u>PL/02934</u></b>
<b>Date:</b> 14/05/2025

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## 1. Purpose of this Statement of Common Ground

This Statement of Common Ground has been prepared by two parties to address matters of deliverability in respect of the development at Land Adjacent to the Beeches, Whitland, shown edged in red in Appendix 1.

It addresses the following deliverability indicators:

1. The planning status of the site.
2. Any progress being made towards the submission of application(s) required to be granted before development may lawfully commence.
3. Any progress with site assessment work required for an application submission and / or before development may lawfully commence.
4. Any relevant information about financial viability affecting the commencement of development.
5. Any relevant information about site ownership and access constraints affecting site assessment or the commencement of development.
6. Any relevant information about infrastructure provision necessary to support / enable the development.
7. Expected delivery and build-out rates.

For the purpose of this Statement Carmarthenshire County Council is “The Local Planning Authority” and Asbri Planning is “The Agent” acting on behalf of Pobl Group in relation to this site.

## 2. The planning status of the site.

The subject site, measuring 1.94 hectares, is proposed for inclusion in the Revised LDP under the temporary site reference SeC19(i), with an indicative allocation for 50 dwellings. Situated within the built-up area of Whitland, the site lies at the heart of the town. It forms part of a greenfield parcel of land positioned between the existing LDP allocation T2/6h4 (Adjacent to Spring Gardens) to the east and Maes Abaty to the west. The settlement lies south of the A40, providing strong transport connectivity.

An Outline planning application for major residential development was submitted in October 2021. The Section 106 agreement was completed and signed, with Outline planning permission subsequently being granted on 30<sup>th</sup> September, 2022. In early 2025, Pobl Group began the process of acquiring the site for development. They are currently finalising the legal contract, which is nearing completion, and have confirmed their intention to acquire the site and submit the Reserved Matters application within the required timescale in 2025. Asbri Planning has been instructed by Pobl to progress the Reserved Matters and Discharge of Planning Conditions.

Further information on the planning status is outlined below.

### 3. Any progress being made towards the submission of application(s) required to be granted before development may lawfully commence?

An Outline planning application was submitted in October 2021 for major residential development with all matters reserved for future consideration except access. The S106 was completed and the planning permission released on the 30<sup>th</sup> September 2022. Pobl Group are currently finalising the legal contract, which is nearing completion, and have confirmed their intention to acquire the site and submit the Reserved Matters application within the required timescale in 2025.

### 4. Any progress with site assessment work required for an application submission and / or before development may lawfully commence?

As part of the outline planning application submitted in October 2021, the following reports were submitted.

- Archaeological Investigation including Geophysical Survey
- Arboricultural Impact Assessment
- Preliminary Ecological Assessment
- Preliminary Ecological Appraisal Bat Survey Report

The outline application was subject to the formal Pre-Application Consultation Process and was subject to further significant consultation with both statutory and community consultees as part of the formal planning application process.

Statutory consultees including Natural Resources Wales; Dwr Cymru/Welsh Water; Archaeological Trust; CCC Highways; CCC Housing; CCC Ecology; CCC Landscape; CCC Trees; CCC Drainage; CCC Environmental Health; and CCC Education raised no objections towards the outline application subject to the imposition of conditions which are reflected on the outline planning permission itself. The principle of developing the site has been established and considered acceptable through the grant of outline planning permission. As aforementioned, the proposed access arrangement was considered and approved as part of the outline application.

### 5. Any relevant information about financial viability affecting the commencement of development?

Application PL/02934 was subject of a signed Section 106 Agreement. The S.106 required a planning policy compliant 30% of the dwellings to be affordable, however Pobl Group will deliver in excess of this. Pobl Group are also aware of the financial contribution towards Education and this has been factored into contract discussions with the landowner.



**6. Any relevant information about site ownership and access constraints affecting site assessment or the commencement of development.**

The site is owned by the Trustees of the Mrs Min Thomas deceased will trust, c/o Moor Farm, Whitland, Carmarthenshire SA34 0LS.

Access and highway infrastructure proposals were approved as part of the outline planning permission and will be implemented in accordance with the conditions imposed on the outline planning approval.

**7. Any relevant information about infrastructure provision necessary to support / enable the development.**

The principle of developing the site has already been established by virtue of the extant outline planning permission granted. The necessary infrastructure provision to enable development of the site is set out in the decision notice of planning application PL/ 02934. Asbri Planning has been instructed by Pobl Group to progress both a Reserved Matters and Discharge of Planning Condition submissions to enable the site to be developed.

**8. The landowner's delivery intentions and anticipated start and build-out rates:**

<b>Timescale (Years)</b>	<b>2026/2027</b>	<b>2027/2028</b>	<b>2028/2029</b>
<b>Number of Dwellings Completed</b>	10	36	4

Pobl Group intend on exchanging contracts with the landowner by July 2025. The Reserved Matters application for a development of circa 50-60 units will be submitted before the end of September. Although Pobl Group are currently considering a range of 50 to 60 units, the indicative number has not yet been formally considered; for the purposes of this consultation, an assumed figure of 50 dwellings will be used. It is anticipated that Reserved Matters approval will be granted in early 2026 with all pre-commencement conditions subsequently cleared to facilitate a start on site in early 2027. The first occupations are expected in November 2027 with the build completed in 2029.

2026/2027 Occupations – 10

2027/2028 Occupations – 36

2028/2029 Occupations - 6

## 9. Signatories to the Statement of Common Ground

Carmarthenshire County Council (“The Local Planning Authority”) and Asbri Planning Limited consider that the allocation is sustainable, viable and deliverable.

Signed on behalf of The Local Planning Authority	<i>Ian R Llewelyn</i>
Name	Ian Llewelyn
Position	Strategic Policy and Placemaking Manager
Date	02/04/2024

Signed on behalf of Asbri Planning acting on behalf of Pobl Group	<i>R.Davies</i>
Name	Rob Davies
Position	Associate at Asbri Planning
Date	14/05/2025

# Appendix 1

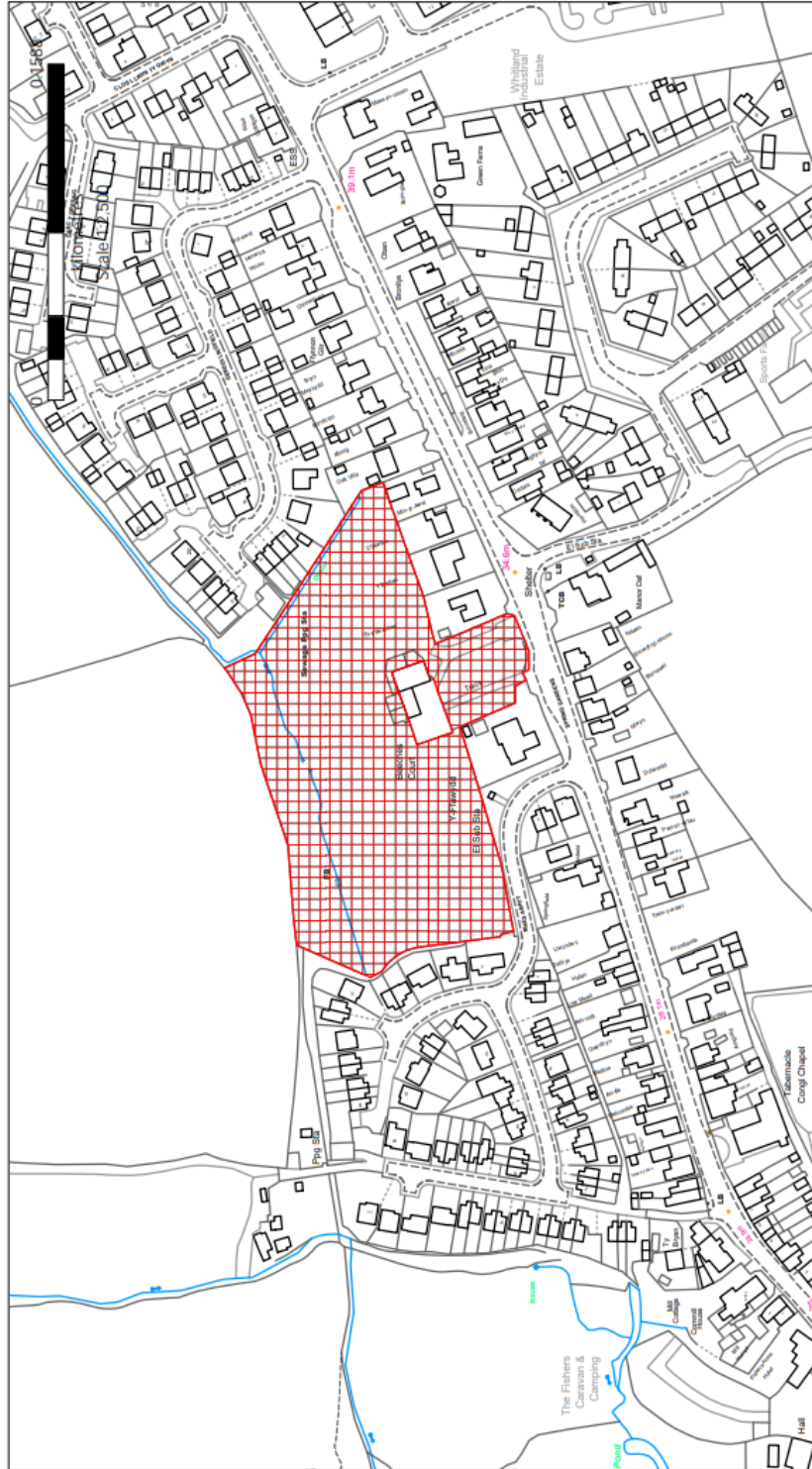
## Location Plan



Lle a Chynaliadwydd.  
Lle, Seilwaith a Datblygu Economaidd.  
3 Heol Spilman, Caerfyrddin. SA31 1LE

Place and Sustainability.  
Place, Infrastructure and Economic Development.  
3 Spilman Street, Carmarthen. SA31 1LE

Enw'r Safle / Site Name:  
Tir cyfagos i'r Beeches / Land Adjacent to the Beeches  
Anheddiad / Settlement: Hendy-gwyn / Whitland  
Cyf. Ymgynghori / Consultation Ref.: SeC19/(i)



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## Appendix 2

### Decision notice



[sirgar.llyw.cymru](http://sirgar.llyw.cymru)  
[carmarthenshire.gov.wales](http://carmarthenshire.gov.wales)

TOWN AND COUNTRY PLANNING ACT 1990

## Decision Notice

### Outline Planning Permission Granted

---

#### Applicant

Gwynne Phillips  
C/O Agent

Application No: **PL/02934** registered on 02/11/2021 for:

<b>Proposal:</b>	Outline (major) application for residential development (including affordable element) together with new vehicular access and associated parking and landscaping (all matters reserved except highways)
<b>Location:</b>	Land adjacent to Spring Gardens, Whitland, SA34 0HP
<b>Application Type:</b>	Outline planning consent - some matters reserved

Carmarthenshire County Council HEREBY GRANT OUTLINE PLANNING PERMISSION for the development proposed by you as shown on the application form, plan(s) and supporting document(s) subject to the following condition(s):

***Please read the conditions listed below carefully, some conditions may require to be discharged prior to or during development.***

---

#### **Condition 1**

Application for approval of reserved matters must be made to the Local Planning Authority before the expiration of three years from the date of this permission, and the development must be commenced not later than whichever is the later of the following:-

- the expiration of five years from the date of this outline planning permission;
- the expiration of two years from the date of approval of the last of the reserved matters to be approved.

**Reason:** Required to be imposed pursuant to Section 91 of the Town and Country Planning Act 1990.

**Condition 2**

The permission now granted is an outline permission along with access, within the meaning of the Town and Country Planning (General Development Procedure) Order 1995.

*Reason:* The application is in outline only.

**Condition 3**

The permission now granted relates to the land defined by the submitted drawing number P01 received 25 October 2021 and indicative layout PO3A received 7 December 2021.

*Reason:* For the avoidance of doubt.

**Condition 4**

Development shall not commence until detailed plans of the appearance; landscaping; layout; and scale of each building stated in the application, have been submitted, and received the written approval of the Local Planning Authority.

*Reason:* In the interests of visual amenities in accordance with Policy GP1 of the LDP.

**Condition 5**

Prior to its use by vehicular traffic, the new access road shall be laid out and constructed with 5.5 metre carriageway and 2.0 metre footways.

*Reason:* In the interests of highway safety in accordance with Policy TR3 of the LDP.

**Condition 6**

Prior to the commencement of development the written approval of the Local Planning Authority shall be obtained for a scheme of parking and turning facilities within the curtilage of each plot. These are to be provided on each plot prior to its occupation, and thereafter shall be retained, unobstructed in perpetuity. In particular, no part of the access, parking, or turning facilities is to be obstructed by non-motorised vehicles.

*Reason:* In the interests of highway safety in accordance with Policy TR3 of the LDP.

**Condition 7**

No development shall take place until a detailed Construction Traffic Management Plan is submitted for the written approval of the Local Planning Authority and thereafter shall be implemented in full and as agreed.

*Reason:* In the interests of highway safety in accordance with Policy TR3 of the LDP.

**Condition 8**

No building shall be occupied until a point of connection on the public sewerage system as has been identified by a hydraulic modelling assessment, which shall be first submitted to and approved by the Local Planning Authority. Thereafter the connection shall be made in accordance with the recommended connection option following the implementation of any necessary improvements to the sewerage system, as may be identified by the hydraulic modelling assessment.



*Reason:* To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment in accordance with Policy GP4 of the LDP.

**Condition 9**

No development shall take place until:

- i) a survey to establish the current flow and load received at Whitland Wastewater Treatment Works has been undertaken; and
- ii) an assessment of the impact of the development hereby approved on the Wastewater Treatment Works having regard to the results of the flow and load survey has been undertaken and agreed with the Local Planning Authority; and
- iii) if necessary, a scheme of reinforcement works for the Whitland Wastewater Treatment Works has been agreed with the Local Planning Authority in order to allow it to accommodate the foul discharges from the development hereby approved without increasing the risk of breaches to the discharge consent for the Whitland Wastewater Treatment Works.

No dwellings shall be occupied until the agreed scheme has been completed.

*Reason:* To prevent hydraulic overloading of the public sewerage system, protect the health and safety of existing residents, ensure no pollution of or detriment to the environment and to ensure the site can be effectively drained in accordance with Policy GP4 of the LDP.

**Condition 10**

No development shall be commenced until full details of sustainable surface water drainage have been submitted to and approved in writing by the Local Planning Authority.

*Reason:* To ensure sustainable surface water drainage in accordance with Policy SP2 and EP3 of the LDP.

**Condition 11**

Prior to the determination of any application(s) for reserved matters seeking approval of 'layout' or 'landscaping': no trees with trunk/stem diameter exceeding 100 mm, measured at a height of 1.5 metres above ground level; or hedges, which are located within or on the site boundary shall be cut down, uprooted, destroyed, topped, lopped or pruned without the prior written approval of the Local Planning Authority. Following such approval all works are to be carried out in accordance with BS3998.

*Reason:* To ensure that the development retains, incorporates and does not adversely affect existing landscape or other features which contribute to local qualities and distinctiveness: thus, delivering the objectives of CLDP policies: - SP1 d) and i); SP14 e); GP1 b) and f); and EQ5; and pursuant to section 197 (a) of the Town and Country Planning Act 1990.

**Condition 12**

Any reserved matters application(s) in relation to this outline approval, shall include submission of a Landscape Constraint Plan (LCP) to approval by the Local Planning Authority. The LCP shall define the following: -

- a) Stem location, canopy spread and root protection area (RPA) of all trees and groups of trees within or on the application boundary, and outside the boundary with a canopy spread which overhangs the boundary.
- b) Outer extent of above ground growth or canopy spread; and RPA of all other landscape elements (hedgerows and continuous woodland/ scrub/ shrub areas) within or on the application boundary.

If the proposed development would result in potential impacts from: construction operations; changes in level; construction phase access; or installation of underground apparatus, within any RPAs defined within the LCP, the following shall also be submitted to approval: -

- i) Tree survey and Categorisation Report for all trees, groups of trees and other landscape elements subject to potential impacts within the RPAs.
- ii) Arboricultural Impact Assessment (AIA) which identifies the impacts of the proposed development on all trees, groups of trees and other landscape elements. The AIA shall clearly indicate which are to be retained; which are subject to potential impacts; and which are to be removed. The AIA shall provide appropriate mitigation proposals for all trees, groups of trees and other landscape elements which are to be removed.
- iii) Arboricultural Method Statement (AMS) which provides methodology for the implementation of any aspect of the development that is within the RPA of all trees, groups of trees and other landscape elements identified for retention within the AIA.
- iv) Tree Protection Plan (TPP) which provides details of all protective measures, operations and construction exclusion zones for all trees, groups of trees and other landscape elements to be retained.

All information shall be in compliance with the recommendations of BS5837.

*Reason:* To ensure that the development retains, incorporates and does not adversely affect existing landscape or other features which contribute to local qualities and distinctiveness: thus delivering the objectives of CLDP policies: - SP1 d) and i); SP14 e); GP1 b) and f); and EQ5; and pursuant to section 197 (a) of the Town and Country Planning Act 1990.

#### **Condition 13**

Any reserved matters application(s) in relation to this outline approval, shall include an appropriate and comprehensive detailed Landscape Design Scheme (LDS), which shall be approved in writing by the Local Planning Authority. The LDS shall be in compliance with all ecological and biodiversity recommendations and proposals for the site; and relevant guidance as provided by the Local Planning Authority. The approved LDS shall be fully implemented in the first available planting and seeding seasons following commencement of development. Any existing elements retained or translocated; or new elements installed, constructed, planted or seeded in accordance with the approved scheme which, within a period of 5 years after implementation are removed; die; become diseased; damaged or otherwise defective, to such extent that, in the opinion of the Local Planning Authority, the function of the element in relation to this planning approval is no longer delivered, shall be replaced, within six months of written notification by the Local Planning Authority, or within the next available planting or seeding season thereafter, with replacement elements of similar size and specification.

*Reason:* To ensure that the development enhances the character and appearance of the site and ensures the use of good quality hard and soft landscaping and embraces opportunities to enhance biodiversity and ecological connectivity: thus delivering the objectives of CLDP policies: - SP1 d) and i); GP1 a), f) and i); EQ5; and where appropriate EQ6.

#### **Condition 14**

Any reserved matters application(s) in relation to this outline approval, shall include submission of Landscape Maintenance and Management (LMM) information to approval by the Local Planning Authority. The information shall include the following: -

- i) LMM Responsibility Plan which provides clear definition of those areas:-
  - Subject to transfer to future private ownership and management responsibility.
  - Proposed for adoption by the local authority.
- ii) LMM Scheme for all areas within the application boundary not included in the above. The LMM Scheme shall include: -
  - Plans, specifications and schedules for establishment and long-term maintenance and management, of all identified landscape areas, including monitoring and remedial operations.
  - Details of the management agent (body or organisation) responsible for implementation of the LMM scheme; and the legal and funding mechanism(s) by which delivery of the LMM scheme will be secured.

All landscape maintenance and management operations shall be fully implemented as approved.

*Reason:* To ensure effective long-term delivery of landscape and ecological proposals.

#### **Condition 15**

The development shall be carried out strictly in accordance with the proposed mitigation measures set out in section 7 Recommendations of the 'Bat Survey' by Gould Ecology, dated July 2022.

*Reason:* In the interests of protected species in accordance with Policy SP14 of the LDP.

#### **Condition 16**

The development shall be carried out strictly in accordance with the proposed mitigation measures set out in section 7.16 – 7.30 Recommendations of the 'Preliminary Ecological Appraisal' by Gould Ecology dated January 2021.

*Reason:* In the interests of ecology in accordance with Policy SP14 and EQ4 of the LDP.

#### **Condition 17**

Any Reserved Matters application shall include full details of lighting. The Lighting Plan should include:

- Details of the siting and type of all external lighting to be used.
- Drawings setting out light spillage in key sensitive areas, in particular all retained trees with bat roosting potential, as well as all retained treelines and hedgerows.
- Details of lighting to be used both during construction and operation.



- Measures to monitor light spillage once development is operational.

The lighting shall be installed and retained as approved during construction and operation.

*Reason:* In the interests of protected species in accordance with Policy SP14 of the LDP.

#### **Condition 18**

A sensitive clearance strategy for reptiles should therefore be prepared by a competent ecologist and submitted to the Local Planning Authority for consideration prior to the commencement of any works and the strategy implemented as approved.

*Reason:* In the interests of ecology in accordance with Policy SP14 and EQ4 of the LDP.

#### **Condition 19**

Any Reserved Matters application shall be accompanied by a method statement for marshy grassland mitigation at pre-construction, construction, and post-work management stages. The works shall be carried out as approved.

*Reason:* In the interests of ecology in accordance with Policy EQ4 of the LDP.

#### **Condition 20**

Any Reserved Matters application shall include a plan showing a 7m buffer zone along the water course, accompanied by a method statement for pollution/disturbance/damage control at pre-construction, construction, and post construction management stages, prepared by a suitably qualified ecologist. The works shall be carried out as approved.

*Reason:* In the interests of ecology in accordance with Policy EQ4 of the LDP.

#### **Condition 21**

Any Reserved Matters application shall include the Biodiversity Enhancements as indicated on the revised drawing 'Proposed Site Layout Plan [P03-A] dated 07 December 2021. The enhancement shall be carried out as approved.

*Reason:* In order to provide biodiversity enhancement in accordance with the Environment (Wales) Act 2016 and PPW (Edition 11).

#### **Reasons for Granting Planning Permission**

The decision to grant planning permission has been taken in accordance with Section 38 of the Planning and Compulsory Purchase Act 2004, which requires that, in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise.

- The proposed development complies with Policy SP1, GP1, GP2, H1 & H2 of the LDP in that it is sensitive infilling within the settlement development limits on an allocated housing site which is appropriate in scale and design to the urban form and is not likely to cause unacceptable harm to neighbouring properties.

- The proposed development complies with Policy AH1 of the LDP in that 30% of the houses on the site are proposed to be affordable as set out in the S106 Agreement.
- The proposed development complies with Policy GP3 of the LDP, in that contributions have been agreed for Education as set out in the S106 Agreement.

#### **Note 1**

Please note that this permission is specific to the plans and particulars approved as part of the application. Any departure from the approved plans will constitute unauthorised development and may be liable to enforcement action. You (or any subsequent developer) should advise the Council of any actual or proposed variations from the approved plans immediately so that you can be advised how to best resolve the matter.

In addition, any conditions which the Council has imposed on this permission will be listed above and should be read carefully. It is your (or any subsequent developers') responsibility to ensure that the terms of all conditions are met in full at the appropriate time (as outlined in the specific condition).

The commencement of development without firstly meeting in full the terms of any conditions which require the submission of details prior to commencement of development will constitute unauthorised development. This will necessitate the submission of a further application to retain the unauthorised development and may render you liable to formal enforcement action.

Failure on the part of the developer to observe the requirements of any conditions could result in the Council pursuing formal enforcement action in the form of a Breach of Condition Notice.

#### **Note 2**

The applicant/developer's attention is drawn to the requirement to enter into an agreement pursuant to Section 106 of the Town and Country Planning Act 1990 in respect of 30% affordable housing and the higher contribution towards Education which is necessary in order to serve the needs of the settlement.

#### **Note 3**

Comments and guidance received from consultees relating to this application, including any other permissions or consents required, is available on the Authority's website ([www.carmarthenshire.gov.uk](http://www.carmarthenshire.gov.uk)).

#### **Note 4**

This application has been determined within the scope of the delegated authority granted to the Head of Planning by the Meeting of Carmarthenshire County Council on 12 October 2011 (Minute No 7 refers).

**DATED:** 30/09/2022

*Rhodri Griffiths*

**Pennaeth Lle a Chynaliadwyedd / Head of Place and Sustainability**

**PLEASE NOTE:** Your attention is drawn to the attached notes which explain, amongst other things, your right of appeal against this decision.

## Appendix 4 – Ecology Note on Breakers’ Yard, Gorslas – Additional site reference PrC3/(ix)

# Carmarthenshire Revised Local Development Plan 2018-2033

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## **Ecology Note – Breakers Yard, Gorslas (PrC3/(ix))**

May 25



# Summary

## **Proposal**

Ecology Note – Breakers Yard, Gorslas (PrC3/(ix)

## **Location**

Breakers Yard, Gorslas

## **Date**

May 2025

## **Project Reference**

S25.137

## **Client**

Mannor Homes Ltd

## **Product of**

Asbri Planning Limited  
Suite D,  
1st Floor, 220 High St,  
Swansea  
SA1 1NW

## **Prepared by**

Rob Davies – Associate

## **Approved by**

Richard Bowen – Director

## **Disclaimer**

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## Appendices

Appendix 1 – Woodland & Scrub Note

Appendix 2 – Indicative Site Layout Plan

Appendix 3 – Indicative Biodiversity Enhancement Plan

## Introduction

- 1.1 On the 10<sup>th</sup> June, 2024, Carmarthenshire County Council submitted its 2<sup>nd</sup> Deposit Revised LDP and associated documents to the Welsh Government and Planning Environment Decisions Wales (PEDW) for examination. The examination hearing sessions subsequently took place in October and November 2024.
- 1.2 On the 31<sup>st</sup> January 2025, the Inspectors who are conducting the Examination into the Plan outlined their preliminary findings in respect of the rLDP's proposed housing supply and noted that the flexibility in the housing supply should be increased from 2.5% to at least 10% flexibility to ensure that there was sufficient provision to meet the housing need.
- 1.3 As a result, and to address the requirement of increasing the flexibility allowance within the Plan, the Council have undertaken an exercise to identify potential additional land for new homes to be included within the rLDP. These additional sites were published for consultation on the 27<sup>th</sup> March, 2025 for a 7 week period up until the 15<sup>th</sup> May, 2025.
- 1.4 The Additional Sites Report identifies land at the Breakers Yard, Gorslas (PrC3/(ix) as a potential allocation that can indicatively accommodate 80 units. The expected on site affordable housing contribution is 16 units.
- 1.5 The site consists of an established recycling facility, which continues to have a valid operators licence. The majority of the site is therefore considered to be brownfield, previously developed land with an established use that is non-conforming with the prevailing surrounding residential land uses.
- 1.6 The majority of the site is located within the defined 'development limits' of the area and forms part of a housing allocation in the current Adopted LDP. The majority of the site has also recently been subject to the formal Pre-Application Process (PAC) for an outline application. Reference should be drawn to the Statement of Common Ground for information on the current planning status of the site and progress made towards site development.
- 1.7 Asbri Planning with input from I&G Ecological Consulting has been instructed by Mannor Homes to produce this Ecological Note that specifically addresses the key ecological considerations, constraints and solutions. The Ecological Note has been prepared in line with the requirements of Planning Policy Wales Edition 12 published in February 2024. It aims to demonstrate, with the aid of some visual representations, how the site's proposed development adopts a step-wise approach when it comes to maintaining and enhancing the biodiversity credentials of the application site, whilst ensuring scheme viability.
- 1.8 This Ecological Note should be read in conjunction with the Additional Sites Report; Background Evidence including Site Assessment Proformas; and the Statement of Common Ground between Carmarthenshire County Council and Mannor Homes.

## Site Description

- 2.1 The site is a former recycling facility set immediately south of Cefneithin Road, at the western edge of the village of Gorslas, and a short distance north west of Cross Hands. The site is an irregular shaped parcel of land that extends to some 3.16ha in area. The wider adjacent land in the Landowner's ownership extends a further 3.93ha and has significant potential for habitat restoration (some of which would be classified as Section 7 habitat). The site is situated approximately 16 km south east of Carmarthen and approximately 13 km north of Llanelli. The application site is centred on Ordnance Survey Grid Reference co-ordinates Easting: 256595 Northing: 213632.
- 2.2 The site currently comprises a former recycling facility, inclusive of a number of structures and areas of hardstanding, alongside a quantum of vegetation and trees. The existing vehicular access point is a gated entrance located at the site's northern boundary, from Cefneithin Road, which runs parallel to the full extent of the site's northern boundary.
- 2.3 In respect of surroundings, the application site is bound by agricultural land and residential dwellings to the north beyond Cefneithin Road. Residential dwellings which make up the western extent of Gorslas adjoin the site's eastern boundary. Further areas of vegetation are located immediately south and west of the site.



## Legislation and Policy Context

- 3.1 The Environment Wales Act (2016) sets out the requirement for the 'sustainable management of natural resources' together with new ways of working to achieve this. Part 1 of the Environment Act sets out Wales' approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory 'principles of sustainable management of natural resources' defined within the Act.
- 3.2 Section 6 of the Act – 'Biodiversity and resilience of ecosystems duty' places a duty on public authorities to 'seek to maintain and enhance biodiversity' so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to 'promote the resilience of ecosystems'.
- 3.3 Section 7 of the Act – 'Biodiversity lists and duty to take steps to maintain and enhance biodiversity' lists living organisms and types of habitat in Wales which are considered of principal importance to maintaining and enhancing biodiversity in relation to Wales. The Welsh Ministers are required to take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and encourage others to take such steps.
- 3.4 Planning Policy Wales Edition 12 (February 2024) sets out the land use planning policies of the Welsh Government. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.
- 3.5 Chapter 6 of PPW 'Distinctive and Natural Places' covers the environmental and cultural components of placemaking. Integrating green infrastructure, and resilient biodiversity and ecosystems are key components of this Chapter.
- 3.6 Paragraph 6.21 of Planning Policy Wales defines green infrastructure as *"the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways, peatlands and mountain ranges or be connected networks of mosaic habitats, including grasslands. At a local scale, it might comprise parks, fields, ponds, natural green spaces, public rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks"*.
- 3.7 The Environment (Wales) Act 2016, provides a context for the delivery of multi-functional green infrastructure. Its protection and provision can make a significant contribution to the sustainable management of natural resources, and in particular to protecting, maintaining and enhancing biodiversity and the resilience of ecosystems in terms of the diversity within and connections between ecosystems and the extent and condition of these ecosystems, so that they are better able to resist, recover from and adapt to pressures. This means that the development of green infrastructure is an important way for local authorities to deliver their Section 6 duty under the Environment (Wales) Act 2016.
- 3.8 The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and

design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes.

- 3.9 The DECCA framework is used for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act. These are: Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience.

A summary of the definitions is described below:

- **Diversity:** *maintaining and enhancing diversity at every scale, including genetic, structural, habitat and between-habitat levels. This supports the complexity of ecosystem functions and interactions that deliver services and benefits.*
- **Extent:** *incorporating measures which maintain and increase the area of semi-natural habitat/features and linkages between habitats. In general, smaller ecosystems have reduced capacity to adapt, recover or resist disturbance.*
- **Condition:** *The condition of an ecosystem is affected by multiple and complex pressures acting both as short term and longer term types of disturbance. Both direct and wider impacts should be considered, for example avoiding or mitigating pressures such as climate change, pollution, invasive species, land management neglect etc.*
- **Connectivity:** *This refers to the links between and within habitats, which may take the form of physical corridors, stepping stones in the landscape, or patches of the same or related vegetation types that together create a network that enables the flow or movement of genes, species and natural resources. Developments should take opportunities to develop functional habitat and ecological networks within and between ecosystems, building on existing connectivity.*
- **Aspects** of ecosystem resilience (adaptability, recovery and resistance): *ecosystem resilience is a product of the above four attributes. Adaptability, recovery and resistance to/from a disturbance are defining features of ecosystem resilience.*

- 3.10 Section 7 of the Environment Act 2016 and Paragraph 6.4.4 of Planning Policy Wales re-enforces the fact that all reasonable steps must be taken to maintain and enhance biodiversity and promote the resilience of ecosystems and these should be balanced with the wider economic and social needs.

- 3.11 Paragraph 6.4.11 of Planning Policy Wales states that “*planning authorities must follow a step-wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact*”.

Figure 12: Summary of the Step-Wise Approach

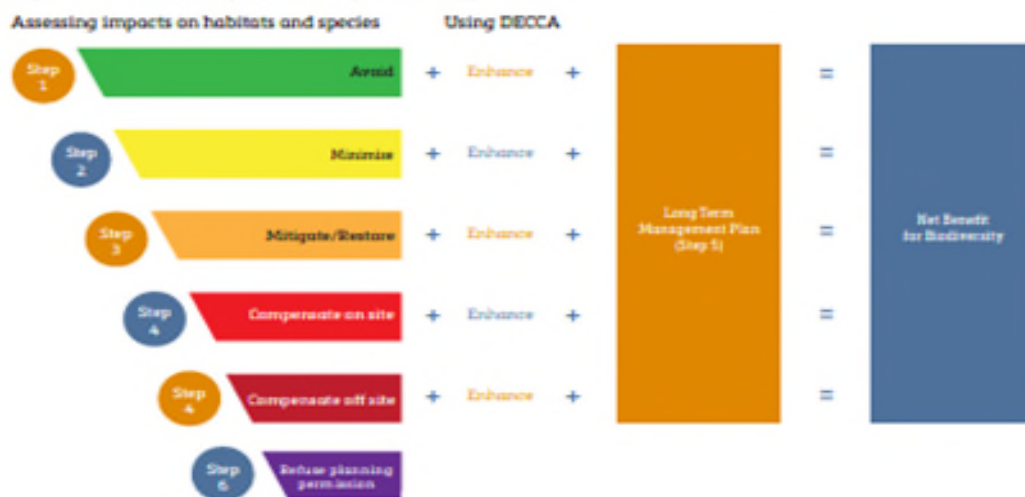


Figure 1: Summary of the Step-Wise Approach (Source : Planning Policy Wales, Edition 12)

- 3.12 As noted above, the step-wise approach, otherwise known as the mitigation hierarchy, indicates that avoidance is preferable, and where impacts cannot be avoided, they should be minimised, mitigated/restored and if required compensated.
- 3.13 Paragraph 6.4.8 of PPW advocates that all those participating in the planning process adopt a proactive and creative approach to facilitating the delivery of biodiversity and ecosystem resilience outcomes. PPW goes on to advise that collaboration is needed, which may mean exploring ways in which land may be identified and set aside to deliver net benefits for biodiversity and establishing where contributions could come forward towards the funding of nature recovery projects.
- 3.14 The step-wise approach acknowledges that the use of planning obligations can be utilised to secure long term mitigation. PPW states that this should normally take the form of habitat restoration, or habitat creation, or the provision of long-term management agreements to enhance existing habitats and deliver a net benefit for biodiversity.
- 3.15 Paragraph 6.4.42 of PPW states that the permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. Where individual or groups of trees and hedgerows are removed as part of a proposed scheme, planning authorities must first follow the step-wise approach. Where loss is unavoidable, proportionate compensatory planting will be required.

## Baseline Position

- 4.1 Carmarthenshire County Council's Constraints Map indicates that the site does not contain any statutory designated ecological sites. The Site Assessment Proforma confirms that the site is not located within or immediately adjacent to any sites for importance to nature conservation.
- 4.2 A significant amount of ecological and arboricultural surveys have been undertaken in relation to the Site and the wider land ownership to establish the baseline position. Such survey work undertaken by the landowner's professional consultants establish a more detailed baseline position in comparison to the GBI Baseline used in the rLDP process.
- 4.3 The following surveys have been undertaken:
- Preliminary Ecological Appraisal Report dated May 2023 by I&G Ecological Consulting
  - Updated Preliminary Ecological Appraisal Report dated September 2024 by I&G Ecological Consulting
  - Reptile and Amphibian Survey & Marsh Fritillary Survey Report dated November 2023 by I&G Ecological Consulting
  - Dormouse Survey Report dated August 2023 by Amber Environmental Consultancy
  - Otter Survey Report dated August 2023 by I&G Ecological Consulting
  - Bat Survey Report dated September 2024 by I&G Ecological consulting
  - Badger Survey Report dated November 2023 by Amber Environmental Consultancy
  - NVC Botanical Survey dated October 2024 by I&G Ecological Consulting
  - Arboricultural Survey Report dated February 2025 by ArbTS
- 4.4 A Preliminary Ecological Appraisal of the Site and the wider land owned by the applicant was undertaken to establish the ecological baseline, identify any ecological constraints, and make recommendations for further survey work. The PEA broadly identifies that the habitats present within the Site and wider area surveyed include broadleaved semi-natural woodland, dense scrub, marshy grassland, ephemeral / short perennial, buildings and bare ground. An extract from the Phase 1 Habitat Map is provided in Figure 2.



### Legend

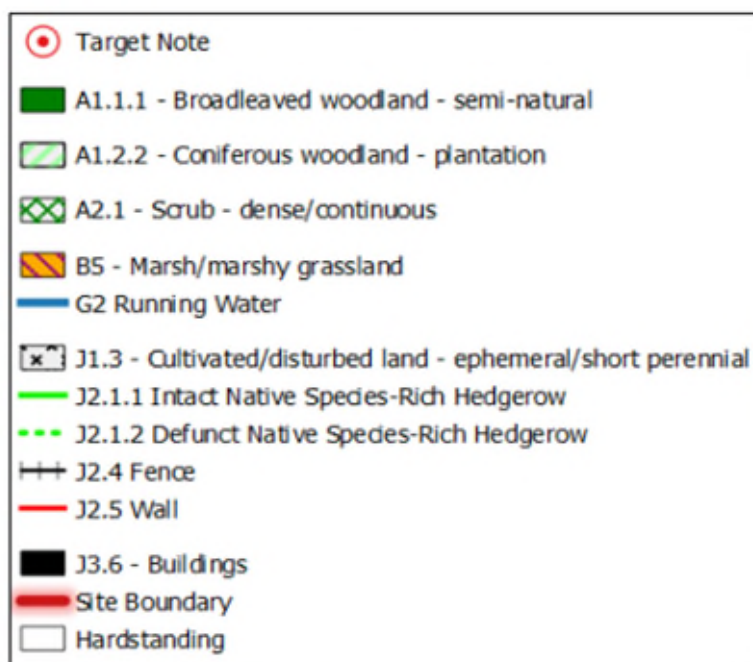


Figure 2: Phase 1 Habitat Map (Source: Updated Preliminary Ecological Appraisal, I & G Ecological Consulting)

- 4.5 The Aerial Images below taken from the Woodland and Scrub Note produced by I&G Ecological Consulting (see Appendix 1) clearly evidence that due to a lack of management since the recycling facility stopped trading, scrub has encroached into many areas and in turn reduced large areas of Section 7 Purple Moor Grass / Rush Pasture. Whilst the images show that the original woodland around the main working area of the site have expanded, much of this includes young (10 years or younger) willow scrub. It will be shown later in this document that the more mature woodland can be retained, and that the



removal of younger scrub to not only facilitate a viable residential scheme but also as part of a Marshy Grassland Management Plan will deliver significant ecological benefits, including for Marsh Fritillary butterfly, along with wider public benefits.



Figure 3: This aerial photograph from 2006 clearly shows the more mature woodland and also identifies in red areas of historic Marshy Grassland which have since become dominated by young, mostly Willow scrub (Source: I&G Ecological Consulting).



Figure 4: This aerial photograph from 2013 still shows areas of grassland but as will be seen from the subsequent aerial photos contained in full in Appendix 1 in the last 10 years such areas have scrubbed over and have become dominated by young, mostly Willow scrub (Source: I&G Ecological Consulting).



Figure 5: This aerial photograph in 2021 still shows pockets of grassland but the young scrub encroachment into such areas can clearly be seen (Source: I&G Ecological Consulting).

- 4.6 A National Vegetation Classification (NVC) survey of the Site and wider land holding was undertaken. The Site and wider area contains a number of marshy grassland habitats but the survey noted that much of the former extent of marshy grassland has been reduced as a result of scrub invasion. The site is being affected by a number of negative issues including Himalayan Balsam in the more disturbed areas, scrub invasion and rank Purple Moor-grass caused by lack of grazing, with only around 5% of the habitat still present compared to around 30 years ago. Purple moor-grass and rush pasture are a Section 7 habitat. The area around Cefneithin and Cross Hands is a stronghold for the habitat and is known for its Marsh Fritillary butterfly records. It is a key habitat for Carmarthenshire County Council and its protection, management and enhancement would be of benefit to provide further habitat for Marsh Fritillary in the area. An extract from the NVC report showing extents of grassland habitats is included in Figure 6.



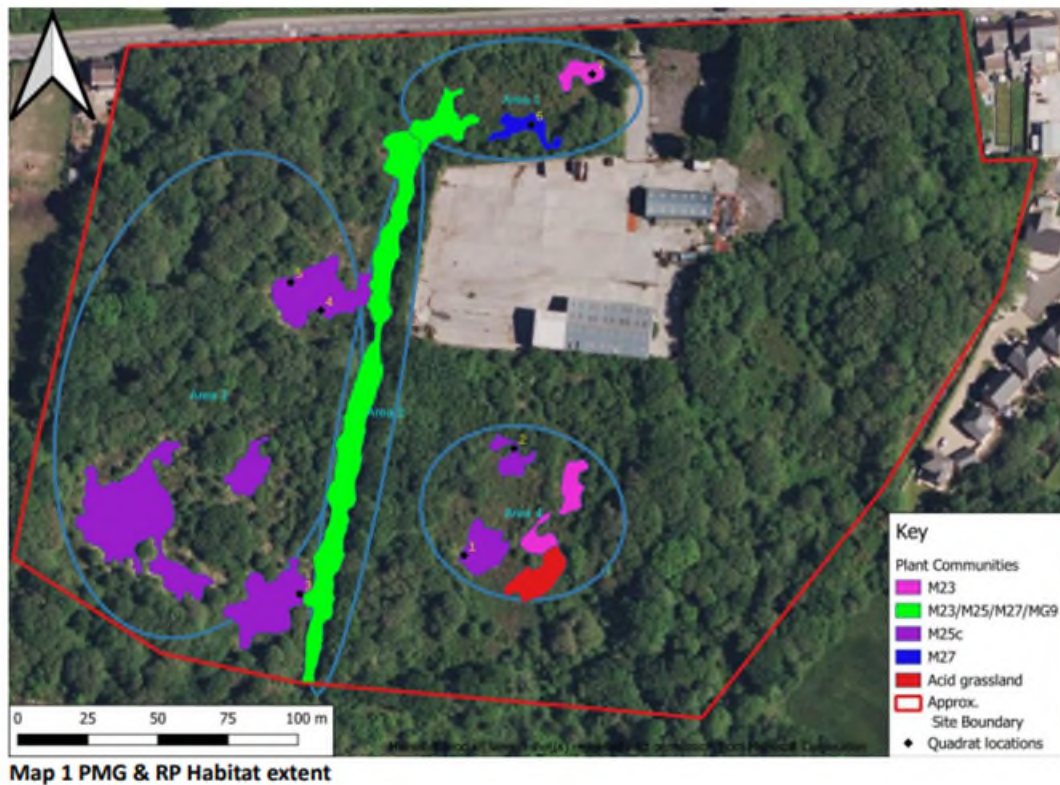


Figure 6: Extract from NVC Report (Source: I&G Ecological Consulting)

- 4.7 To reverse this, an assessment of the restoration potential has been made. Opportunities to manage and enhance existing habitats to become very high quality, principally the areas of Purple Moor-grass and Rush Pasture have been identified. It also has the potential to improve the habitat for Marsh Frillfly butterfly. An extract from the NVC report in terms of restoration potential is included in Figure 7 below:-



Figure 7: Extract from NVC Report (Source: I&G Ecological Consulting)



- 4.8 The Purple Moor-grass and Rush Pasture has already undergone significant loss on the wider land holding in the last 20-30 years from scrub invasion, and without intervention it will be completely lost within the next 20 years. The extent of scrub invasion can be seen when cross referencing between the historic aerial photographs (2006 and 2021), and more recent aerial images included above. Although scrub habitat has ecological value, the importance of the Section 7 Marshy Grassland habitat is seen to be of higher ecological value and importance in the area.
- 4.9 An Arboricultural survey of the Site has been undertaken. The main tree constraints identified were individual and group Category B trees to the eastern side of the site. Extracts from the Tree Report are included in Figures 8, 9 & 10 below. When cross referencing between the historic aerial image (Figure 10 below) and the most recent (Figure 9 below) the more matures trees and tree lines identified during the tree survey in comparison to the more recent trees/scrub can clearly be distinguished.





Figure 9 : Tree Constraints Plan Based on Recent Aerial Image (Source: Arboricultural Report, ArbTS)



Figure 10 : Tree Constraints Plan Based on Historic Aerial Image (Source: Arboricultural Report, ArbTS)

- 4.10 A summary of the above, including the results of the aforementioned species specific surveys are included in the table below.

**Technical Summary Table – Baseline Position**

Habitats, Features or Species	Results & Recommendations
Designated sites	<p>The site does not contain any statutory designated ecological sites.</p> <p>The site falls within the Caeau Mynydd Mawr Special Area of Conservation Supplementary Planning Guidance Area (SPG) and therefore must accord with the requirements of the SPG. In this regard, both Natural Resources Wales and Council Planning Ecologist acknowledge the significant restoration potential associated with adjacent land to improve marshy grassland (Section 7 habitat) and habitats conducive to supporting Marsh Fritillary Butterfly.</p>
Marshy Grassland	<p>A National Vegetation Classification (NVC) survey of the Site and wider land holding was undertaken. The Site and wider area contains a number of grassland habitats but the survey noted that much of the former extent of grassland has been reduced as a result of scrub invasion. The NVC report goes on to identify the restoration potential to reverse this on the wider land holding. Significant opportunities present themselves to manage and enhance existing habitats to become very high quality. This potential is acknowledged by both NRW and the Council's Planning Ecologist in their formal responses to PAC.</p> <p>It is recommended that the only area of Marshy Grassland identified within the site itself to the north west corner is retained and managed, whilst the aforementioned restoration opportunities on the wider land holding are capitalised upon by virtue of an appropriate management regime. The Council Ecologist acknowledges that the proposed development proposes to avoid areas of species rich purple moor grass and rush pasture</p>
Broadleaved semi-natural woodland	<p>Whilst the Phase 1 Habitat Plan generically identifies large areas of broadleaved semi-natural woodland, the quality, age structure and composition of this can be broken down further. This is clearly evidenced when cross referencing with aerial photographs and the arboricultural report. The areas of more mature woodland in</p>



	<p>comparison to more recent self-seeded, mostly Willow scrub areas can be clearly defined to inform scheme design.</p> <p>Whilst the Council Ecologist has raised concern over the loss of woodland, NRW have not raised any issues in this regard in their response to PAC. It is recommended that the more mature trees / woodland are retained, and that an appropriate level of compensatory planting is proposed in lieu of the younger trees to be lost. Such re-planting will provide a more varied composition than the current woodland and scrub which in part is dominated by young Willow scrub. This is necessary to deliver a viable residential scheme on the site that will have clear public benefits.</p>
Reptiles	<p>A presence / absence survey for reptiles found a small population of common lizard using the Site. Poor habitat suitability was found over much of the Site. Therefore in terms of mitigation a combination of active reptile and amphibian protection during site clearance, followed by installation of a hibernaculum, and suitable management of a proportion of remaining adjacent habitat is recommended. The Council's Ecologist raised no adverse comment in terms of reptiles in their PAC response.</p>
Marsh Fritillary Butterfly / Invertebrates	<p>A Marsh Fritillary survey was undertaken. Whilst Devil's-bit Scabious, the larval food plant was found in three small patches within the more accessible areas of the area surveyed, the area occupied by this and other suitable habitat was not considered large enough to support a population. The report therefore recommends that the larger area of contiguous land supporting Purple Moor Grassland is considered for habitat management to provide habitat for Marsh Fritillary. Suitable methods of management would include reduction of areas of scrub, and translocation of Marsh Fritillary host plant species.</p> <p>Both NRW and the Council's Ecologist in their responses to PAC acknowledge the significant potential that exists to restore and improve habitat on the wider land holding conducive for Marsh Fritillary Butterfly. In this regard it has been suggested that contact be made with the Caeau Mynydd Mawr Project Officer to explore its potential as a Marsh Fritillary project and enter into</p>

	a management agreement. It has the potential to exceed the SPG requirements.
Dormouse	<p>A Dormouse survey of the Site identifies two dormouse nests in the western hedgerow area. As Dormouse have been confirmed present in the western area of the site, and there is good connectivity to woodland, NRW must be consulted and any future works such as vegetation clearance undertaken under EPS licence.</p> <p>In their response to PAC NRW raise no specific objection and defer the consideration to the planning application stage, and advise that the planning submission is accompanied by an appropriate Dormouse Conservation Strategy.</p>
Otter	<p>A Otter survey undertaken identified no signs of Otter. Notwithstanding an artificial Otter holt located offsite to the south is recommended for enhancement purposes.</p> <p>NRW in their response to PAC raise no concerns in terms of Otter.</p>
Bats	<p>A Bat scoping and activity survey identified that no Bats were utilising the property, however Bats were detected foraging and commuting. The report recommends a series of bat and bird enhancement measures that can be taken forward as part of detailed design.</p> <p>NRW in their response to PAC raise no concerns in terms of Bats.</p>
Badger	A Badger survey was undertaken which did not identify any Badger setts.

## Development Impacts and Achieving Net Benefit for Biodiversity

- 5.1 The previous section of this report has evidenced that a significant amount of ecological related surveys have been undertaken to establish the baseline position and duly inform scheme design. This section includes a series of visual aids to evidence how a viable residential scheme could be provided whilst being responsive to the key ecological considerations and constraints identified, with appropriate solutions proposed. They should be cross referenced with the baseline Figures contained in the previous section. A summary table is provided to evidence how the stepwise approach advocated in Planning Policy Wales has been followed, and how a net benefit for biodiversity can be achieved.
- 5.2 The indicative site layout plan contained in Figure 11 below and Appendix 2 clearly evidences how a viable circa 80 unit residential scheme has responded as much as possible to ecological constraints, and is respectful of the more sensitive ecological and arboricultural areas of the site. The Marshy Grassland area identified within Site to the north-west is avoided and retained as part of the layout. This Marshy Grassland area is identified as Area 1 on the NVC image in Figure 6 and is species rich with 27 indicator species recorded.
- 5.3 The indicative site layout plan and the Tree Constraints Plan contained in Figure 12 below clearly indicate that the majority of the more mature trees and scrub identified to the east are retained with new tree planting proposed throughout the site. It seeks to retain as much woodland and scrub areas as possible and in this respect will not cause a long-term adverse impact on the local amenity of the area through tree loss and cause no long term arboricultural impact on the health of retained trees on or adjacent to the site. The loss of some younger, mostly Willow scrub however is unfortunately unavoidable to ensure that a viable residential scheme with wider public benefits is delivered. The indicative layout also shows how green links and corridors can be provided both within and around the edges of the proposed development, that provide ecological connectivity networks with wider immediately adjacent offsite habitat.



Figure 11: Indicative Site Layout Plan (Source: DP Architecture)



Figure 12: Tree Constraints Plan Superimposed on top of Indicative Site Layout Plan (Source: Arboricultural Report, ArbTS)

- 5.4 The previous NVC report identified significant potential opportunities to manage and restore offsite habitat, and improve the ecological resource. The undeveloped land within the site (blue line boundary)



contains remnants of Purple Moor-grass dominated Rush Pasture (PMGRP). This habitat is categorized as Section 7 habitat and is valuable for a range of species including Marsh Fritillary. The grassland on site was once part of a much larger area of similar habitat, which still supports Marsh Fritillary. Through lack of management, the site has become scrubbed over, with only a few small pockets of grassland remaining. Although very mature scrub is an important habitat, particularly if it makes connections between pockets of woodland, younger scrub is of less biodiversity value and would, in this instance, be considered of lower importance than the S7 PMGRP.

- 5.5 All areas of open grassland which are now dense and in a rank condition will require annual cutting and removal of arisings in order to bring it back to good condition. Where grassland remains but scrub Willow and Bramble have recently started to encroach individual trees can be completely removed, pulled manually or mechanically, and the resulting open grassland can be managed with an annual cut, as above. Areas of older scrub will require systematic stem treatment, initially leaving as standing deadwood. Depending on grassland management mechanisms available (grazing or mechanical cutting), deadwood areas can be cleared to open up for ease of management, especially if mechanical cutting. Figure 13 below shows suggested areas for targeting and means of restoration.
- 5.6 It is envisaged that a Marshy Grassland Management Plan could be progressed as part of any subsequent planning application that would set out in detail the proposed management and maintenance arrangements, and assign roles and responsibilities in this respect. Its successful implementation would be secured as part of the formal planning application process.

#### Plan 2 – Proposed Restoration & Management



Figure 13: Targeted areas for Marshy Grassland restoration and management (Source: I&G Ecological Consulting)

- 5.7 Mannor Homes Ltd are fully aware that ecological enhancement must be secured over above, and in this respect an Indicative Biodiversity Enhancement Plan contained in Figure 14 below and contained in full



in Appendix 3 demonstrates how a Net Benefit for Biodiversity can be achieved. The biodiversity enhancements proposed include:-

- New indigenous tree planting
- New flowering / fruiting trees
- New indigenous hedging and shrubbery
- Sparrow terraces
- Swift/Swallow cups
- Bird nest boxes
- Insect hotel
- Externally mounted bat boxes
- Integrated bat boxes
- Hedgehog shelters
- Reptile / amphibian hibernaculum
- Artificial Otter holt



5.8 In light of the above the following table summarises how the indicative layout shown has adopted the stepwise approach and achieved a net benefit for biodiversity.

Habitat/Species	Impact	Step-wise Approach	Mitigation / Compensation	Enhancement / Net Benefit for Biodiversity
Marshy Grassland	There is no adverse impact on Marshy Grassland, only a positive one.	<b>Avoided</b>	Not required	The implementation of a Marshy Grassland Management Plan on the wider

				land holding will achieve significant habitat restoration and enhancement (Section 7 Habitat).
Semi-Natural Broadleaved Woodland (Younger Scrub)	The loss of some younger mostly Willow scrub whilst facilitating a viable residential scheme that will have significant wider public benefits to the locality is unavoidable.	Minimised/Mitigated	Whilst as much trees and scrub as possible will be retained, the inevitable loss of younger mostly Willow scrub/trees will be mitigated for on-site by an appropriate level of tree planting. Such planting will achieve a more varied composition.	In addition to planting new indigenous trees, new flowering/fruit trees will also be proposed as part of planting scheme.
Semi-Natural Broadleaved Woodland (Mature Scrub)	It has been shown that the more mature trees and scrub areas can be largely avoided and impact minimised in this respect.	Avoided/Minimised	Whilst the impact on mature trees and scrub is largely avoided and certainly minimised, as aforementioned new trees will be planted on site. Such planting will achieve a more varied composition.	In addition to planting new indigenous trees, new flowering/fruit trees will also be proposed as part of planting scheme.
Reptiles	A presence / absence survey for reptiles found a small population of common lizard using the Site. Poor habitat suitability was found over much of the Site.	Avoided/Minimised	Combination of active reptile and amphibian protection measures will be implemented during site clearance.	Reptile and amphibian hibernaculum will be installed whilst suitable management of a proportion of remaining habitat will be undertaken.

Marsh Fritillary / Invertebrates	A Marsh Fritillary survey was undertaken. Whilst Devil's-bit Scabious, the larval food plant was found in three small patches within the more accessible areas of the wider area surveyed, the area occupied by this and other suitable habitat was not considered large enough to support a population.	<b>Avoided</b>	Not required	The larger area of contiguous land supporting Purple Moor Grassland is to be managed to provide habitat for Marsh Fritillary. Suitable methods of management would include reduction of areas of scrub, and translocation of Marsh Fritillary host plant species. Both NRW and the Council's Ecologist have acknowledged the significant potential that exists to restore and improve habitat on the wider land holding conducive for Marsh Fritillary Butterfly.
Dormouse	Two Dormouse nests were found in the hedgerow adjacent to Cefneithin Road. As much vegetation as possible will be retained along Cefneithin Road with new planting proposed where required.	<b>Minimised/Mitigated</b>	As much woodland and scrub as possible will be retained with significant new planting proposed to achieve green ecological links. This will be informed by a Dormouse Conservation Strategy to be submitted at planning application stage	New indigenous tree and hedgerow planting proposed.

			as requested by NRW.	
Otter	A Otter survey undertaken identified no signs of Otter.	<b>Avoided</b>	Not required	Artificial Otter holt to be provided
Bats	A Bat scoping and activity survey identified that no Bats were utilising the property, however Bats were detected foraging and commuting	<b>Avoided</b>	Not required	Integrated and externally mounted bat boxes
Badger	A Badger survey was undertaken which did not identify any Badger setts.	<b>Avoided</b>	Not required	

- 5.9 The above table has clearly evidenced how the stepwise approach has been followed informed by a significant amount of baseline information and recommendations contained within various ecological survey reports. It has demonstrated what ecological features can be avoided, or when such impacts are unavoidable to achieve a viable residential scheme in the wider public interest, how the impact can be minimised and mitigated against. Opportunities for enhancement and achieving a Net Benefit for Biodiversity, including significant habitat restoration on the wider land holding acknowledged by both NRW and Council's Ecologist have been identified and can be secured at planning application stage.
- 5.10 The site's development in the manner proposed will result in significant public benefits by sustainably developing previously developed land; delivering much needed housing and affordable housing; and removing a non-conforming industrial use. The site's development will positively address land contamination with appropriate remediation as acknowledged by NRW in their response. Conditions in relation to contaminated land and a Construction Environmental Management Plan are recommended by NRW.
- 5.11 Restricting the net developable area to only the hardstanding and building areas of the site would render a residential scheme on the site unviable. The Council's Ecologist has acknowledged that the proposed development avoids areas of species rich purple moor grass and rush pastures, and that significant enhancement opportunities including habitat restoration as supported by PPW have been identified in this respect. Whilst the impact upon semi-natural broadleaved woodland cannot be completely avoided it has been shown that the impact has been minimised and mitigated for. The more mature trees and scrub areas can largely be retained. The removal of younger, self-seeded trees and scrub is needed to ensure that a viable scheme in the wider public interest is achieved, however appropriate mitigation has been proposed. The successful establishment of a planting scheme and associated biodiversity

enhancements will provide a network of healthy, multi-functional and biodiverse green space, capable of delivering a wide range of environmental benefits for people and wildlife.

## Conclusion

- 6.1 This Ecological Note has specifically addressed the key ecological considerations, constraints and solutions relating to the Breakers Yard site in Gorslas. The Ecological Note has been prepared in line with the requirements of Planning Policy Wales Edition 12 published in February 2024, and has demonstrated with the aid of visual representations, how the site's proposed development adopts a step-wise approach when it comes to maintaining and enhancing the biodiversity credentials of the application site, whilst ensuring scheme viability.
- 6.2 In accordance with Section 7 of the Environment Act 2016 and Paragraph 6.4.4 of Planning Policy Wales it has been evidenced that all reasonable steps have been taken to maintain and enhance biodiversity and promote the resilience of ecosystems, and these should be balanced with the wider economic and social needs.

## Appendix 1 – Woodland & Scrub Note

## **Scrub encroachment at Breaker's Yard, Cefneithin Rd, Gorslas, Carmarthenshire.**

Scrub has become a dominant habitat at this site since it stopped trading as a metal recycling yard. Notwithstanding the use is established, and the site continues to have a valid operator's licence. Therefore such a facility could re-start at the site without impediment.

Prior to this the site was active and was sporadically (annually) maintained by the owner. Areas of marshy grassland were cut on an annual basis and encroaching scrub kept under control.

Since it stopped trading the site has become dominated by young (mostly willow) scrub. The scrub has encroached on to large areas of Section 7 Purple More Grass / Rush pasture habitat reducing its size and quality.

The area around Cefneithin and nearby Crosshands has a number of Marsh Fritillary butterfly records and it is possible that the Cefneithin Rd site was once inhabited by Marsh Fritillary but due to the lack of management and encroachment of scrub the site has become unsuitable.

Surveys for Marsh Fritillary by I&G Ecological Consulting Ltd have shown that the main food plant for Marsh Fritillary caterpillars still exists on site and through positive management of the remaining marshy grassland areas through vegetation cutting, scrub removal and reduction, this site could be recolonised by Marsh Fritillary butterfly.



Although scrub has an important ecological value the Section 7 habitat on the site is of higher ecological importance and value and in order to ensure this habitat is maintained and enhanced on site, scrub must be reduced.

A plan for the management of the Section 7 Marshy Grassland habitat has been put forward and its successful implementation would be secured as part of the formal planning application process.

By working alongside members of Carmarthenshire County Council's ecology dept there is significant potential to improve Marsh Fritillary habitat within the area and to increase Section 7 habitat within the area and county.



**The pictures above show the marshy grassland areas being colonised with young scrub and saplings.**

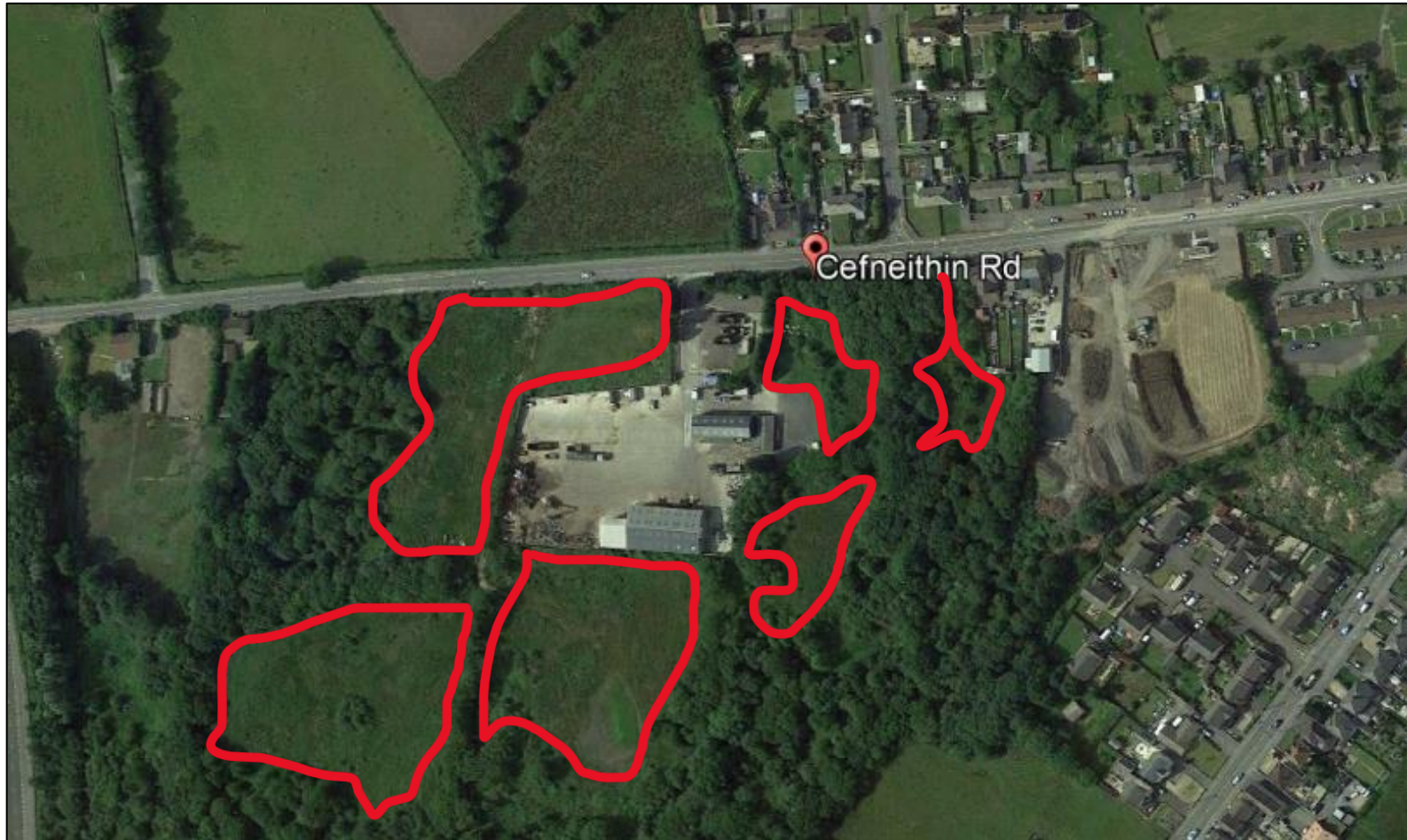
The aerial images below clearly show how the lack of management over the last 10 years has allowed scrub to march across areas. The images show how the original woodland around the main working area of the site have expanded through scrub encroachment.



**The aerial above shows the 2006 site and the open marshy grassland sections**



The 2006 aerial image shows large open areas to the east of the main yard but each aerial photo then shows how scrub has encroached slowly in to these areas.



The 2013 aerial above shows that the main marshy grassland areas are mostly the same as the 2006 aerial, the areas to the east of the yard have started to close in but are still clearly visible.

The proposed site layout has been designed to try and retain as much of the original woodland which can be clearly seen on the 2006 – 2013 aerals. From 2013 onwards the scrub starts to encroach on to the open areas. The aerals clearly show that the site has scrubbed over significantly over the last 10 years since the closure of the site.

Although some of the scrubbed areas will be cleared there is significant areas of planting proposed along boundaries and within the site which will provide excellent habitat and retain connectivity within and around the proposed development site.

The proposed planting will provide a more varied species composition than the existing woodland and scrub (mainly willow). Native flowering and fruiting trees have been proposed to provide resources for pollinators, birds and other wildlife.

All efforts have been made to retain the most mature trees on site and the most mature areas of woodland.

Most of the scrub proposed for removal is approximately 10 years and under in age.



**Above: Young willow scrub encroaching from the woodland out towards the yard and buildings.**

The loss of woodland / scrub as part of the development proposal is not ideal but the proposal has tried to ensure that the higher value areas are retained and diversified with additional planting of more beneficial species. The scrub is dominated by Willow; this fast-growing species is encroaching on to Section 7 habitat and without management the habitat will be lost. Through specified management techniques the Section 7 habitat could be saved and managed for the future.

Retention of the higher value woodland and scrub around the yard area and the proposed diverse species of planting within and around the development site will retain key habitat and ensure connectivity for wildlife.

Altogether the development site has the potential to offer housing alongside a wildlife rich mix of habitats, with the land outside the development being secured for the future through specified management techniques to ensure the protection of Section 7 habitat and other important habitats.



2023 Aerial Image





2021 Aerial Image





2020 Aerial Image





2019 Aerial Image





2018 Aerial Image





2016 Aerial Image





2015 Aerial Image





2013 Aerial Image





2010 Aerial Image





2009 Aerial Image





2006 Aerial Image



## Appendix 2 – Indicative Site Layout Plan





1 **Site**  
1 : 500

**dp**architecture  
56 Walter Road Swansea SA1 5PY  
tel: 01792 466554 mob: 0777 585 3754  
e-mail david@dparchitecture.co.uk

Job			Description	
Development Site at Cefneithin Road, Gorslas			Indicative Site Layout	
Scale	1 - 500	Approved		Figural dimensions must be taken, not scaled dimensions. All discrepancies in this drawing must be reported immediately to the Contracts Administrator. Contractor must check all dimensions on site.
Date	April 25	Job No.	23 - 03	
Drawn By	dp	Dwg. No.	23-03/P2A	



## Appendix 3 – Indicative Biodiversity Enhancement Plan



**Biodiversity Enhancement Plan:**

**Land at Cefneithin Road,**

**Gorslas,**

**Llanelli,**

**SA14 7HT**

**February 2025**

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## Summary

Following the results of the Preliminary Ecological Appraisal (PEA), I & G Ecological Consulting Ltd were commissioned to produce a Biodiversity Enhancement Plan (BEP) in line with the Environment (Wales) Act 2016 and *Policy 9 of Future Wales (2040)*. The BEP is to include appropriate biodiversity improving recommendations, as touched on in the PEA.

A Preliminary Ecological Appraisal was undertaken on a site approximately 3.16 hectares in size, at Cefneithin Rd, Gorslas, Llanelli, SA14 7HT to assist with an ongoing planning application in relation to the proposed development of residential dwellings on the site. The habitats present within the wider survey area include broadleaved semi-natural woodland, dense scrub, marshy grassland, ephemeral / short perennial, buildings and bare ground. Boundary features consisted of intact and defunct species-rich hedgerow, fencing and wall. The proposed development site contains habitat suitable for mammals (including badger), birds, bats, reptiles and terrestrial phase amphibians.

## 1. INTRODUCTION

1.1.1 I & G Ecological Consulting Ltd were commissioned to undertake a Biodiversity Enhancement Plan following the undertaking of a Preliminary Ecological Appraisal (PEA) Report undertaken on a site approximately 3.16 hectares in size, at Cefneithin Rd, Gorslas, Llanelli, SA14 7HT. This report aims to satisfy Section 6 of the Environment (Wales) Act 2016, which states that planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity.

1.1.2 The PEA describes the land as consisting of broadleaved semi-natural woodland, dense scrub, marshy grassland, ephemeral / short perennial, buildings and bare ground. Boundary features consisted of intact and defunct species-rich hedgerow, fencing and wall. The proposed development site itself is of *high local* ecological value. In the absence of mitigation, the development may result in adverse impacts on:

- mammals (including badger)
- nesting birds
- bats
- reptiles
- terrestrial phase amphibians.

1.1.3 The following report seeks to provide habitat enhancement proposals for the species groups in question. Refer to Figure 1 for location overview.

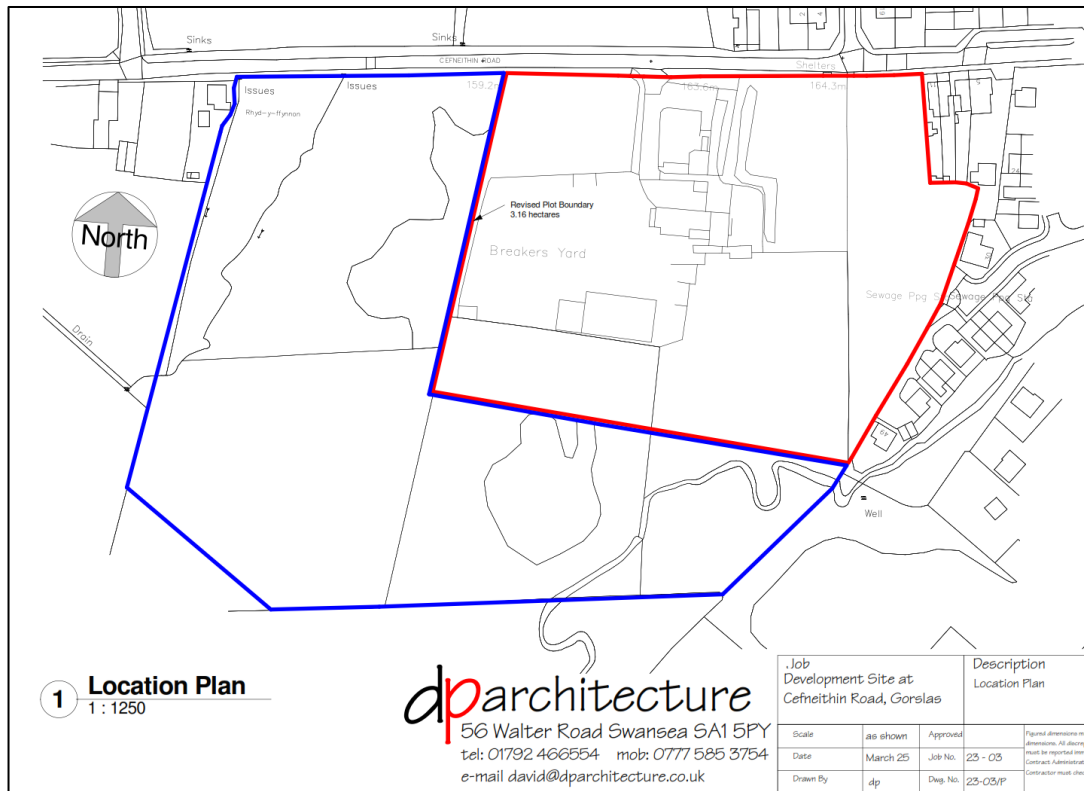


Figure 1. Location of the site, Grid Ref: SN 56635 13681



Figure 2. Proposed Site Layout



## **2. Scope of Enhancement**

### **2.1 Proposed Site Layout**

- 2.1.1 The proposed development plan shows the location of the residential dwellings and planned access routes from Cefneithin Road (Figure 2).

## **3. Enhancements for Species**

- 3.1.1 The current site layout utilised the majority of the land available, however there are areas of retained Marshy Grassland, semi-natural broadleaved woodland and native hedgerow, allowing scope for enhancement.

### **3.2 Nesting Birds**

- 3.2.1 Provision for bird nesting can be achieved by incorporating a mix of bird box types and sizes onto suitable trees within the site and should include open fronted and traditional hole fronted (See Appendix 1 for suggested designs and products).
- 3.2.2 Nest boxes can be placed on, or incorporated into the proposed development directly. These are typically made of timber, but there are numerous materials and bespoke product finishes also available. Consideration of position is important to avoid disturbance to chicks, and mess to doorways, windows and vehicles / equipment.
- 3.2.3 Additional wildflower and tree planting will benefit birds, providing food, nesting and shelter. Such planting will also benefit a range of other animal groups such as invertebrates and small mammals.
- 3.2.4 Proposed Enhancement Provision:
- *Recommendation 1:* house sparrow terrace nest boxes on the northern aspect of select new dwellings, with preference given to dwellings near the outer perimeter of the site.
  - *Recommendation 2:* house martin cup nest boxes on the northern aspect of select dwellings, with preference given to dwellings near the outer perimeter of the site.
  - *Recommendation 3:* bird boxes on mature trees in the wooded areas in the adjacent habitat
- 3.2.5 Ensure that the chosen trees are to be retained i.e., not affected by *Chalara* (Ash Die Back), or designated for removal to facilitate the works.
- 3.2.6 Use a removable fixing (not nails), to securely attach the boxes, so that they can be brought down for annual cleaning / maintenance.

3.2.7 Position of boxes will be based on advice from an on-site ecologist and supplier support (e.g., wildcare.co.uk or another specialist provider). See Appendices 1 and 4 for reference.

3.2.8 Annual maintenance (e.g., cleaning out, checking attachment is secure) will be undertaken by site occupant.

### 3.3 Bats

3.3.1 Bats may utilise the site for foraging and roosting. Additional capacity can be provided by erecting suitable artificial roosts / bat boxes on trees within the woodland in habitat adjacent to the south-east of the site. minimum height of two meters, and without obstruction (clear flight line to front of box).

3.3.2 Proposed Enhancement Provision:

- Inclusion of bat friendly construction materials on the dwellings which occupy the perimeter of the site, adjacent to the scrub and woodland in the wider area (an ecologist should be consulted on the implementation of bat access bricks and bat friendly tiles into the development, refer to Appendix 1).
- artificial roost boxes to be erected within the areas of mature woodland to the south-west and east of the larger land parcel **prior to works commencing**. To be affixed in a sheltered, elevated (2–7m and ideally 4m) position away from artificial light and potential predation, and ideally facing different directions to provide a variety of roosting opportunities. See appendix 1 for examples.

3.3.3 If it is evident that the boxes are in use by bats, they must not be disturbed and only moved / cleaned under the supervision of or by a licenced bat ecologist. See Appendices 2 and 4 for reference.

### 3.4 Hedgehogs

3.4.1 Any fencing to be erected will be of a style that will allow hedgehogs free access throughout the site, ensuring that they can benefit from habitat and forage resources found both on and off site, e.g., surround gardens, open habitats and hedge-banks.

3.4.2 Proposed Enhancement Provision:

- All property boundaries will allow free movement of animals, particularly Hedgehogs. All close-board or other fencing will include a purpose made access gap to allow commuting to the surrounding habitat. Gaps should be 13cm x 13cm with no sharp protrusions. Gaps should be made toward the rear end of the garden fences (i.e., close to adjacent semi-natural habitats).

### 3.5 Reptiles and Amphibians

3.5.1 The PEA noted that the site possesses some habitat suitable for reptiles. Enhancement for reptiles is usually in the form of improved habitat quality (through sensitive management) and often the provision of man-made hibernaculum, see Appendices 2 and 4 for reference.

3.5.2 Proposed Enhancement Provision:

- Creation of reptile and amphibian 'refugia and hibernacula' in the habitat adjacent to the site – which is essentially a log, rock, and turf pile, constructed on a gentle slope to prevent flooding of hibernaculum. Any leftover logs and brash accumulated during the works will be piled safely in undisturbed areas of retained habitat. The hibernaculum will not require maintenance and should be left undisturbed. See Appendices 2 and 4.

### 3.6 Invertebrates

3.6.1 Gardens to all plots to be planted with native, local provenance trees including Bird Cherry, Crab apple, Rowan or similar fruit/nut bearing species.

3.6.2 Any areas of retained grassland may be seeded with appropriate native species, with the aim of improving the habitat in relation to its surroundings. Incorporating artificial refugia within trees and planting of native trees, shrubs and hedging will also benefit invertebrates.

3.6.3 Proposed Enhancement Provision:

- Areas of suitable retained marsh-type grassland, such as any patches along boundaries should be planted with a selection of species from the following:
  - Grasses: Common Bent (*Agrostis capillaris*), Crested Dog's-tail (*Cynosurus cristatus*), Sweet Vernal grass (*Anthoxanthum odoratum*), and Meadow Foxtail (*Alopecurus pratensis*)
  - Sedges: Flea Sedge (*Carex pulicaris*), Oval sedge (*Carex ovalis*), and Tawny sedge (*Carex hostiana*).
  - Rushes: Soft rush (*Juncus effusus*), Sharp-flowered Rush (*Juncus acutiflorus*), and Jointed Rush (*Juncus articulatus*).
  - Marsh Marigold (*Caltha palustris*), Devil's-bit Scabious (*Succisa pratensis*), Meadowsweet (*Filipendula ulmaria*), and Ragged-robin (*Lychnis flos-cuculi*).

3.6.4 On-site provision of Devil's-bit scabious will support Marsh Fritillary populations in the area and increase habitat connectivity (they have been recorded in adjacent habitats).

3.6.5 Depending on species recommended by supplier, management will likely be an annual cut and removal of arisings for grassland mixes. Management of new and existing trees will be minimal and only as necessary to maintain the health of trees and prevent unacceptable encroachment onto property/public areas, where it may present a safety risk.

- 3.6.6 All such management will be undertaken outside of the bird breeding season (1st March to 31st August). Further specifications on species choice and planting methods, as well as long-term management responsibilities, may be defined in a Landscaping Ecological Management Plan if required by the Local Planning Authority. Advice for species choice, planting location and management can be sought from local suppliers such as Celtic Wildflowers based in Gorseinon (<https://celticwildflowers.co.uk/>).

### **3.7 Hazel Dormouse**

- 3.7.1 There are records of hazel dormouse in the area. The woodland and scrub in adjacent habitats may be enhanced to provide suitable habitat for dormouse. See Appendices 3 and 4.
- 3.7.2 Proposed Enhancement Provision:
- dormouse boxes, in a suitable locations away from human disturbance, at least 2 meters above the ground, fixed securely to a tree trunk, orient the entrance holes towards the trunk, surround the box with vegetation and maintain it annually to keep it in good condition.

## Appendix 1 – Artificial Nests / Roosts

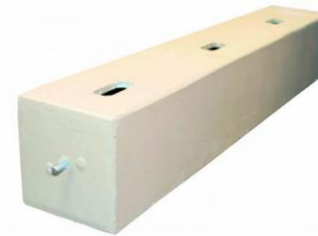
### Artificial Bird Nesting products



*Swallow Cup*



*Swift Box*



*Swift terrace*



*Open fronted nest box*



*Habitat Starling Box*



*House Sparrow Terrace*

## Artificial Bat Roosts

### External



Internal (there is a large range of designs, including maternity roosts – see \*[www.wildcare.co.uk](http://www.wildcare.co.uk) )

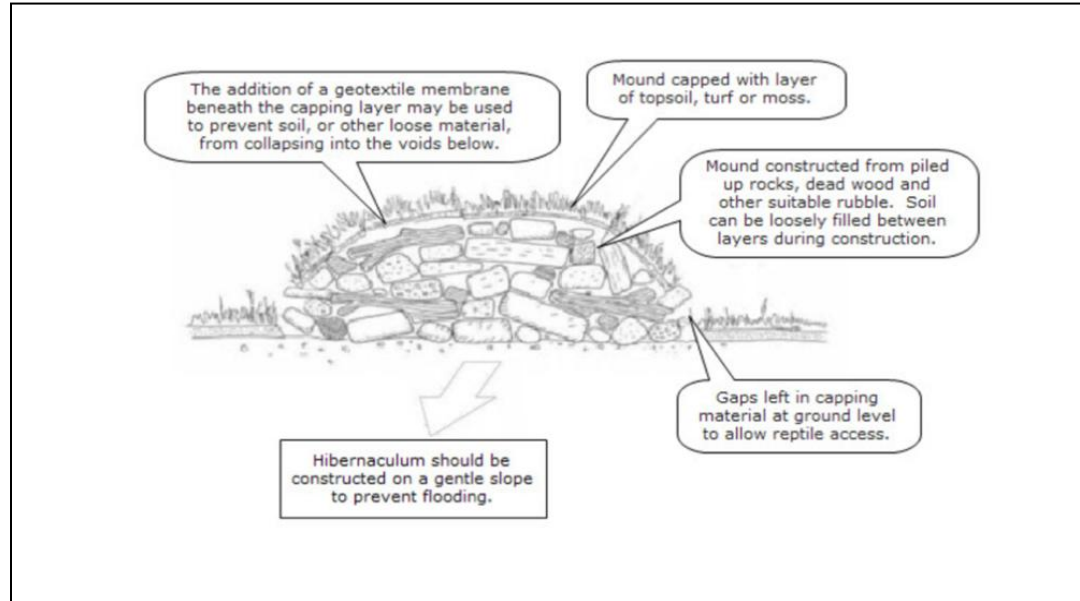


*Ibstock bat brick*

*Habitat Bat Access Tile*

## Appendix 2

### Reptile Refugia / Hibernaculum design



*An example of a suitable hibernaculum for the use of hibernating reptiles/amphibians*



## Appendix 3

### Dormouse Nest Box



*An example of a suitable dormouse nest box*

## Appendix 4



Figure 2. Suitable bat and bird enhancement provisions within the proposed development site.