

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

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**SCHEDULE OF MATTERS, ISSUES AND QUESTIONS**

## Matter 7: Prosperous People and Places – Site Allocations (Cluster 1 – Carmarthen)

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

<b>Allocated Sites</b>	<b>Prosperous People and Places – Site Allocations (Cluster 1 – Carmarthen)</b> PrC1/h4 – Land off Parc y Delyn PrC1/MU1 – West Carmarthen PrC1/MU2 – Pibwrlwyd SeC1/h1 – Lime Grove SeC1/h4 – Cae Canfas, Heol Llanelli SuV1/h1 - Adjacent Fron Heulog SuV4/h1- Land at Troed Rhiw Farm SuV12/h1 – Adjacent to Gwyn Villa SuV17/h1 – Rear of former joinery, Station Road SuV18/h1- Land off A40, Pontargothi SuV20/h1 – Land adjacent to Llwynhenry Farm
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- a) **What is the current use of the allocated site?**
- b) **What is the proposed use of the allocated site?**
- c) **What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?**
- d) **In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?**
- e) **Are the number of residential units proposed realistic and deliverable over the plan period?**
- f) **What are the mechanisms and timescales for delivering the site?**
- g) **Is the allocation of the site essential to ensure the soundness of the Plan?**

Detailed proformas for all allocated housing sites in Cluster 1 can be found in submission document CSD104 ([site-allocation-assessment-cluster-1-complete.pdf \(gov.wales\)](#)).

## PrC1/h4 – Land off Parc y Delyn, Carmarthen

- a) Agricultural land
  
- b) Residential land
  
- c) No significant constraints have been identified. Issues that may need addressing at the planning application stage include:
  - Highways – Whilst there are no identified significant highway issues, there are matters that would need addressing as part of the detail of a planning application.
  - The planning application may have to include biodiversity surveys in relation to reptiles, & dormice.
  - The site is not located within an AQMA, however it is within 600m & an Air Quality Assessment may need to be submitted as part of a planning application.
  
- d) Viability work has been undertaken (submission document CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver affordable housing. Whilst no viability appraisal has been sought for this allocation, there are no known constraints that would make development of the site economically unviable.
  
- e) Yes, it is considered that the number of dwellings proposed (17 dwellings) are realistic and deliverable. The site owners are keen to progress with the development of the site and have submitted a pre-application for the site in 2019. The pre-application provided a proposed site layout of a mix of housing types illustrating how the site could be developed.

- f) It is anticipated that 10 dwellings should be delivered in 2029-30, and 7 in 30-31. The site is owned by a developer, and it is anticipated that they will develop the site.
  
- g) 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.

## PrC1/MU1 – West Carmarthen

Please refer to the following submission documents which support the delivery of the site:

- CSD120 – Position Sites – Key Sites
- CSD121 – Statement of evidence (Council owned site)
- CSD121a – Development Viability Model for Council owned site
- CSD122 – Statement of Common Ground – Land North West of School Site
- CSD123 - Statement of Common Ground – Frondeg
- CSD124 - Statement of Common Ground- Pentremeurig Farm South
- CSD125 – West Carmarthen Planning & Development Brief

- a) Predominantly agricultural land
- b) Mixed use, comprising residential, employment, new primary school and formal and informal recreation.
- c) The site and its delivery forms part of a long-term strategic expansion of Carmarthen and supports the provision of new homes and regeneration proposals. Previously allocated in both the adopted Unitary Development Plan (2001-2016) and Local Development Plan (2006- 2021), the allocation continues, albeit updated, within the Revised LDP. A Planning and Development Brief was prepared for the site in 2010 (CSD125).

Many constraints on the land have been overcome since the site was first allocated, in particular relating to the highway network where a new major spine road has been constructed for the site. The first dwellings on the site were completed in 2016 and have been delivered on a number of parcels of land, mainly on the southern side of the site.

Agricultural land - The allocation pre-dates the emerging Revised LDP, the latest iterations of Planning Policy Wales and the predictive BMV ALC mapping. Whilst it is recognised that the site contains grade 3a agricultural land, the site forms part of a long-term strategic site. Part of the grade 3a classified element of the site has already been built on. Similarly, part of the remaining allocated site area has planning permission for residential development whilst other development

blocks have been subject to pre-application consultations with active marketing of sites also being undertaken. This reflects the longstanding growth proposed in the area and the ongoing investments in bringing the development forward. In continuing to allocate the site in the Revised LDP, regard was had to the ALC. However, it was also important to note the ongoing commitment both in terms of infrastructure delivery and development intent.

Flooding - The site is a very large mixed-use area, and the elements of the site subject to fluvial flooding constraints have been excluded from being developed in the masterplan as set out in the adopted Planning & Development Brief. The extents of floodplain 2 and 3 for rivers and the sea are well constrained to the river corridor. It should therefore be possible to wholly locate built development in flood zone 1.

A site- specific FCA at application stage may be required for parts of the site that lie within flood risk areas, demonstrating how the flood risk will be mitigated through site design. Additional information and review of the existing flood modelling may be required to include ditches and tributaries of the Tawelan Brook which could influence the extent and depths of flooding within the site, including some areas of open / recreation land.

The implications of surface water and small watercourses will be considered during the determination of planning applications, the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse, where appropriate. In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15. The above would be subject to review on publication of the revised TAN15

Mineral Safeguarding - 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 sensitive development.

- d) The Position Paper on Key Sites (submission document CSD120) provides a breakdown of the different elements of the site.

Viability of the site was a big consideration when first allocated as the developers were required to provide contributions towards the provision of the link road, school, recreation and affordable housing. A landowners agreement was drawn up and there is an understanding of the contributions that are required from every phase of the development.

A viability assessment is provided for one parcel of the site (submission document CSD121a). Viability assessments weren't sourced for other parcels of land due to be delivered within the Plan period due to them having planning permission, in the process of having a planning application determined, or their size falling under the threshold of being a major site.

- e) The delivery of the site is underpinned by an adopted Planning and Development Brief, and its delivery has been supported by significant investment in highway infrastructure to serve the delivery of the site area and that of the Yr Egin strategic site. The Brief sets out proposed density rates for the residential elements of the site, and delivery to date has generally been in accordance with these.

A number of units were delivered prior to this Plan period, and a number are proposed after the end date of this Plan. The Position Paper on Key Sites (CSD120) sets out how many dwellings are proposed on the different parts of the site.

- f) Significant capital resources have been allocated to the delivery of this strategic site, some of which has been supported by external funding. The first residential units were completed in 2016, and the major link road opened in 2019. Houses

are continuing to be delivered by housebuilders and are expected to be delivered after the end date of this Plan.

Table 1 of the Position Paper on Key Sites (CSD120) sets out the timing and phasing of the different site elements of the site. Delivery rates have been agreed with the majority of landowners. For the larger sites, Statements of Common Ground have been signed to support the site's delivery.

- g) Yes, the allocation is essential in ensuring that sufficient dwellings are delivered within Carmarthen, a Tier 1 settlement. The search for an alternative provision of 700 dwellings within Carmarthen in sustainable locations and in line with the requirements of PPW would put the soundness of the plan to doubt.

The Council along with partners, landowners and housebuilders have invested time and resources into delivering this site over recent years. Development has begun on the site and further planning applications are coming forward for the site, and it is considered that the site remains to be appropriate and deliverable for the mixed uses described within the Planning and Development Brief.

## PrC1/MU2 – Pibwrlwyd

Please refer to the following submission documents which support the delivery of the site:

- CSD120 – Position Sites – Key Sites
- CSD127 – Statement of Common Ground
- CSD128 – Appendix 1 – Masterplan
- CSD129 – Appendix 2 – Infrastructure Feasibility Study
- CSD130 – Appendix 3 – Transport Assessment
- CSD131 – Appendix 4 – ALC Map Extracts
- CSD132 – Appendix 5 – Development Viability Model

a) Agricultural land

b) Residential land

c) Whilst there are a few constraints on the site, they are not considered to be significant obstacles to the delivery of the site:

Highways – A Transport Assessment has been undertaken (submission document CSD130). The conclusion of the assessment is that *“the development is appropriate and acceptable in traffic and transport terms and that the traffic movements associated with the development proposals could be accommodated on the highway network”*.

Infrastructure – A Multi-Utility Infrastructure Feasibility Study (submission document CSD129) has been undertaken. The assessment considered the supply and use of electricity, gas, water, sewer water and telecommunications.

Agricultural land – Most of the site is open land (classified as Grade 3b in the ALC predictive maps), it also includes a small part of Grade 3a land. The Grade 3a land forms part of the developed college campus area and as such is developed land and not agricultural.



Minerals - 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 sensitive development.

- d) A viability assessment has been undertaken for the site, whilst not published due to commercial sensitivity, it is available to the Inspector if required. The viability assessment has been considered by Burrows Hutchinson Ltd and is set out in the Financial Viability Report Update May 2024 (submission document CSD32). The Report concludes that the viability assessment shows that it is viable for this site to deliver a mixed-use development with 20.3% of the new homes being affordable tenure.

Burrows Hutchinson Ltd, in considering the viability assessment estimate that there are strong indications that compliance with Policy AHOM1 in providing 25% affordable contribution could be achieved. To achieve this, it would involve extending the residential development area into an area indicated on the masterplan as being “reserved land” on the masterplan which could deliver 50 additional dwellings. Alternatively (or additionally), it is considered that there could be scope for reviewing the mix and or type of employment space that is currently proposed, to achieve the same result.

- e) The site is allocated for 247 dwellings which is considered to be realistic and deliverable. In addition to the residential element, the site is also allocated to include employment, commercial leisure and education associated with Coleg Sir Gâr.
- f) A Statement of Common Ground (SOCG) has been agreed between the landowner, Coleg Sir Gar and the Council (submission document CSD127). Timescales for delivering the site are set out within this document and are considered to be realistic and achievable. Expressions of interest from partners in delivering the residential element of the site has been undertaken by the landowners.

In addition to the SOCG, a Masterplan, an Infrastructure Feasibility Study and a Transport Assessment to support its allocation and facilitate its delivery have been undertaken (see submission documents CSD128-130).

- g) No, whilst the number of dwellings on the site is large and contributes to the overall housing allocation within Carmarthen, a principal centre, it is not considered that the site is essential to ensure the soundness of the Plan. The site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Tier 1 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 1.

## SeC1/h1 – Lime Grove, Pontyates

- a) Vacant
- b) Residential
- c) No significant constraints have been identified. There is a requirement under the pending reserved matters application for a highway improvement scheme at the junction of the main road. This requires a financial contribution to overcome the issue.
- d) The site is subject to a modification of a S106 agreement which was signed as part of the outline planning permission. This will determine the level of planning contribution sought from the site; however it is not considered to be a significant issue to develop the site. The developer and the LPA are in correspondence to deal with this modification.
- e) The developer has provided a detailed scheme of the site as part of the Reserved Matters application, and the indicative numbers set out within the Plan are realistic and deliverable.
- f) It is anticipated that these dwellings will be delivered following the approval of Reserved Matters. The housing trajectory anticipates 5 to be completed in 2025/26, 5 in 2026/27, 5 in 2027/28 and 4 in 2028/2029.
- g) No, the site is a relatively small site located in a Tier 2 settlement. Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Tier 2 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 1.

## SeC1/h4 – Cae Canfas, Heol Llanelli

- a) Greenfield
- b) Residential
- c) No significant constraints have been identified. The site is relatively flat with a suitable access arrangement in place.
- d) Viability work has been undertaken (submission document CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver affordable housing. Whilst no viability appraisal has been sought for this allocation, there are no known constraints that would make development of the site economically unviable.
- e) Yes, it is considered that the number of dwellings proposed (8 dwellings) is realistic and deliverable. Given the type of development that the developer has built within the area the density is considered suitable.
- f) The site is allocated for 8 dwellings. It is anticipated that these will be delivered as 2 dwellings per year for the period 2026-2030.
- g) No, the site is a relatively small site located in a Tier 2 settlement. Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Tier 2 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 1.

## SuV1/h1 - Adjacent Fron Heulog

- a) Agricultural land
  
- b) Residential land
  
- c) No constraints have been identified. Development has commenced on the site on a self-build basis.
  
- d) Viability work has been undertaken (submission document CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver affordable housing. Whilst no viability appraisal has been sought for this allocation, there are no known constraints that would make development of the site economically unviable.
  
- e) Yes, it is considered that the number of dwellings proposed (8 dwellings) is realistic and deliverable. An estate road has been constructed to serve the small-scale development, one dwelling has been built, and one is currently under construction. Six of the eight dwellings have some form of planning permission, and the site is being delivered as a self-build site.
  
- f) It is anticipated that 8 dwellings should be delivered by the end of 2031, built on a self-build basis with the construction of one dwelling a year.
  
- g) No, the site is a relatively small site located in a Tier 3 settlement. 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 3 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 1.

## SuV4/h1- Land at Troed Rhiw Farm

- a) Agricultural land
- b) Residential land
- c) No significant constraints have been identified and the SFCA identifies no significant flood risk considerations. The candidate site submission considered issues such as utilities, access to services and facilities and access to the site with no concerns raised.
- d) Viability work has been undertaken (submission document CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver affordable housing or for small sites such as this one to provide a commuted sum. Whilst no viability appraisal has been sought for this allocation, there are no known constraints that would make development of the site economically unviable.
- e) Yes, it is considered that the number of dwellings proposed (6 dwellings) is realistic and deliverable. The density on the site is reflective of the surrounding area.
- f) The site is allocated for 6 dwellings. It is anticipated that these will be delivered as follows: 2 in 2026-27; 2 in 2027-28; and, 2 in 2028-29.
- g) No, the site is a relatively small site located in a Tier 3 settlement. 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 3 settlement, the site forms an important

allocation that will contribute towards the housing figure proposed in settlement cluster 1.

## SuV12/h1 – Adjacent to Gwyn Villa

- a) Agricultural land
- b) Residential land
- c) No significant constraints have been identified. The candidate site submission considered issues such as utilities, drainage, access, impact on the Welsh language, flood risk and site contamination with no concerns raised.

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 sensitive development. The SFCA identifies no significant flood risk considerations.

- d) Viability work has been undertaken (submission document CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver affordable housing. Whilst no viability appraisal has been sought for this allocation, there are no known constraints that would make development of the site economically unviable.
- e) Yes, it is considered that the number of dwellings proposed (20 dwellings) is realistic and deliverable. The density on the site is reflective of the surrounding area. The landowner has submitted a detailed candidate site which includes a proposed layout plan and details of access and road layout.
- f) It is anticipated that the 20 dwellings will be built 5 per year between 2027 – 2031. These delivery rates have been agreed with the landowner who is currently in the progress of submitting a planning application on the site.
- g) No, the site is a relatively small site located in a Tier 3 settlement. 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 3 settlement, the site forms an important allocation in a sustainable location that will contribute towards the housing figure proposed in settlement cluster 1.

## SuV17/h1 – Rear of former joinery, Station Road

- a) Agricultural land
- b) Residential land
- c) Matters are set out in the detailed site proforma (Submission document CSD104). Any constraints affecting the development of the site have been considered as part of planning application (PL/00842).
- d) Viability work has been undertaken (submission document CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver affordable housing.

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/00842). Whilst this application has recently been refused, the reason for refusal related to the failure of the applicant to enter into an agreement under Section 106 of the Town and Country Planning Act 1990 in relation to securing financial contributions towards various matters. It is anticipated that such matters will be resolved at a future date through the submission of a new application.

- e) Notwithstanding the recent refusal of planning application PL/00842, it is considered that both the numbers and trajectory set out in the Plan are realistic and deliverable over the plan period.
- f) The housing trajectory sets out the potential for development throughout the plan period. The mechanisms and timescales for delivery of the site have been considered within planning application PL/00842. Whilst this application has recently been refused, the site has a developer on board and it is anticipated that the matter for refusal will be addressed and that the 35

dwellings will be built in the following years: 15 in 2026/27; 15 in 2027/28 and 5 in 2028/29.

- g) Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Tier 3 settlement, the site forms an important allocation in a sustainable location (within easy access of the A40) that will contribute towards the housing figure proposed in settlement cluster 1.

## SuV18/h1- Land off A40, Pontargothi

- a) Vacant land. Land has been cleared in readiness for development and the estate road has been constructed.
- b) Residential land
- c) The site has extant reserved matters planning permission (E/39041) and a start to development has been made. Further matters are set out in the detailed site proforma (Submission document CSD104). *Please note that the site proforma still refers to the old name for this site – Land adj. Cresselly Arms.*
- d) Any constraints, as well as the need to provide affordable housing, have been considered as part of the viability work associated with planning application (E/39041). Furthermore, viability work has been undertaken (submission document CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver affordable housing.
- e) The number of residential units proposed mirror those set out in planning application E/39041; it is considered that both the numbers and trajectory set out in the Plan are realistic and deliverable over the plan period.
- f) The mechanisms and timescales for delivery of the site have been considered within planning application E/39041. It is anticipated that the 15 dwellings will be built in the following years: 5 in 2025/26; 5 in 2026/27 and 5 in 2027/28.
- g) Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Tier 3 settlement, the site forms an important allocation in a sustainable location (within easy access of

the A40) that will contribute towards the housing figure proposed in settlement cluster 1.

## SuV20/h1 – Land adjacent to Llwynhenry Farm

a) Agricultural land

b) Residential land

c) No significant constraints have been identified.

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 sensitive development.

It is acknowledged that the land to the south of the site falls within flood zone 3 and 2 as identified in the FMfP. However, the land allocated does not fall within the area identified at risk of flooding and the SFCA identifies no significant flood risk considerations.

It is considered that access to the site is achievable from the unclassified road running north-eastwards from the B4310 road towards the A48. The site is unlikely to generate a significant scale of additional traffic which would be incompatible with the settlement's existing scale, highway network and sustainable location.

The candidate site submission considered issues such as drainage, flooding, access, site contamination, ecology and access to services and facilities with no concerns raised.

d) Viability work has been undertaken (submission document CSD32) on the housing policies, in particular the viability of affordable housing and other S106 obligations on market-led residential development sites. The study has concluded that it should be viable for market-led developments to deliver affordable housing or for small sites such as this one to provide a commuted sum. Whilst no viability appraisal has been sought for this allocation, there are no known constraints that would make development of the site economically unviable.

- e) Yes, it is considered that the number of dwellings proposed (6 dwellings) is realistic and deliverable. The density on the site is reflective of the surrounding area.
  
- f) The site is allocated for 6 dwellings. It is anticipated that these will be delivered at a rate of 1 a year from 2025-26 to 2030-31.
  
- g) Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. Given its location within a Tier 3 settlement, the site forms an important allocation in a sustainable location (within easy access of the A48) that will contribute towards the housing figure proposed in settlement cluster 1.