

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

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**Carmarthenshire County Council's Statement**  
**for**

**Hearing Session 14 - Thursday 18 September 2025 10:00 – 17:00**

**Virtual Hearing**

**Matter 14: Prosperous People and Places – Additional Sites (Clusters 3, 4, 5 and 6)**

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

Additional Sites	<ul style="list-style-type: none"><li>• PrC3/(i) – Emlyn Brick works, Penygroes</li><li>• PrC3/(ii) – Land adjacent to Pant-y-Blodau, Penygroes</li><li>• PrC3/(iv) – Land adjoining Maes Ifan, Maesquarre Road</li><li>• PrC3/(v) - Land off Parklands Road, Ammanford</li><li>• PrC3/(vii) – Land off Dôl y Dderwen Myddynfych</li><li>• PrC3/(ix) – Breakers Yard, Gorslas</li><li>• SuV37/(i) – Former Coedmor School, Cwmann</li><li>• SeC15/(i) – Land at Cilycwm Road, Llandovery</li><li>• SeC19/(i) – Land Adjacent to the Beeches, Whitland</li></ul>
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**Questions**

- a) What is the current use of the allocated site?
- b) What is the proposed use of the allocated site?
- c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?
- d) In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?
- e) Are the number of residential units proposed realistic and deliverable over the plan period?
- f) What are the mechanisms and timescales for delivering the site?
- g) Is the allocation of the site essential to ensure the soundness of the Plan?

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

## **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 resulting in allocating 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) (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 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.

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 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 site, 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 is appended to this Hearing Statement below.

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.

### **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 AHOM1 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.

### **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 downwards 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.

## **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 a very small part 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?**

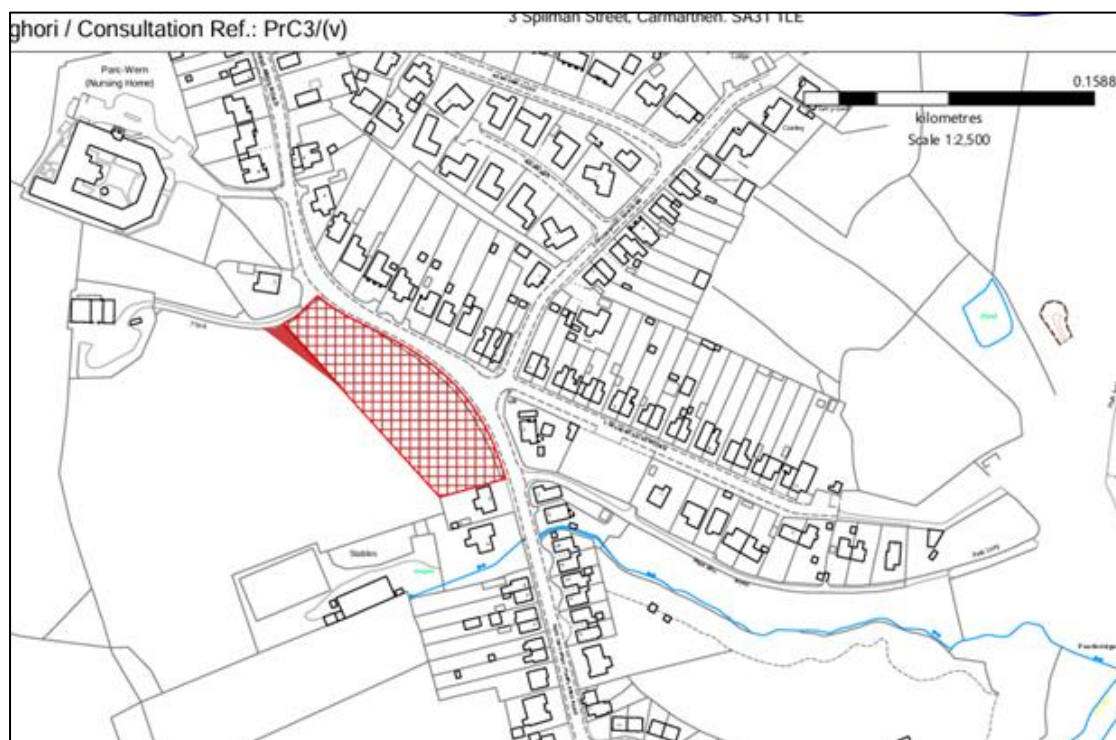
Whilst not necessarily essential to ensure the soundness of the Plan on an individual basis, the site nevertheless forms one of a number of residential allocations that cumulatively contribute towards delivery of the housing target of the Revised LDP. The site has been identified as an appropriate residential 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.

### **Additional comment**

A representation was received during the consultation on the additional sites from the landowner of this site. The representation was generally in support of the site's inclusion but proposed an amendment to the site's rear boundary at its north-western corner to extend the site. The Council has no objection to the proposed amendment being made and are in agreement that it would be a logical extension to the site which would improve its deliverability allowing sufficient depth for the development of the northernmost plot.

The Council therefore suggests that the site boundary is amended as requested and shown below with the addition of the area shaded in red.



## **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. Pre-commencement conditions were discharged in July 2025 (ref. PL/09037).

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.

## **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?**

Part 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 NRW 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.

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 was appended to the Additional Sites report which was presented to the Inspectors. 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 scrubby 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 is appended to this Hearing Statement below.

**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 within 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.

## **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 by Barcud, 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.

## **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.

## **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. The scheme will be supported by Social Housing Grant (SHG) administered by Carmarthenshire County Council (CCC) Housing.

**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. 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 scheme will be supported by SHG administered by CCC Housing. 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?**

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. The scheme will be supported by SHG administered by CCC Housing. 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.

## **Appendix 1 – Development Viability Appraisals**

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



## Financial Viability Appraisal - Summary

Gross Development Value	Units (N°)	% GDV
Open Market Housing	64	91.3%
Affordable Housing	16	8.7%
<b>RESIDENTIAL GDV</b>	<b>80</b>	<b>0.0%</b>
Commercial/Investment NDV		
<b>TOTAL SALES REVENUE</b>	<b>£ 18,613,788</b>	
Other Revenue (Grant or Income)	£ -	
<b>TOTAL DEVELOPMENT REVENUE</b>	<b>£ 18,613,788</b>	<b>100.0%</b>
<b>Land (incl acquisition costs)</b>	<b>£/ac</b>	
Survey & Planning Costs	£131,893	4.4%
<b>Community Infrastructure</b>		
Physical Infrastructure	£/unit	0.9%
Normal On-Site Works	£/unit	1.1%
Abnormal Works/Costs	£/unit	4.5%
Professional Fees	7.51%	4.6%
<b>Housing Construction</b>		
Build & External Costs	£133,782	0.7%
Professional Fees	5.00%	57.5%
<b>Commercial/Investment Construction</b>		
Build & External Costs	£ -	2.9%
Professional Fees	£ -	0.0%
<b>All Construction Contingency</b>	3.00%	0.0%
<b>Sale, Letting &amp; Marketing Costs</b>		
Finance Costs	£ 391,640	2.1%
	£ 247,000	1.3%
	£ 278,360	1.5%
<b>TOTAL DEVELOPMENT COST</b>	<b>£ 15,169,506</b>	
<b>Profit</b>	<b>£ 3,444,282</b>	<b>18.5%</b>

<b>Surplus/(Shortfall) in Profit</b>	<b>(£51,170)</b>	<b>-1.46%</b>
against Benchmark/Target	£3,495,451	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

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

24/04/2025

## Primary Data, KPI's and Sensitivity Testing

**Total Site Area (Net Developable)**

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

### Development Densities

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

### Average Residential Values

	£ psf	£ psm	N°	%	Avg GIA	Total GIA m²
Open Market dwellings	£265,625	£2,798	64		94.92	6,075.00
Affordable - Social rent	£92,351	£1,742	12	75.0%	53.00	636.00
Affordable - Int/other	£126,394	£1,523	4	25.0%	83.00	332.00

### Sensitivity Testing Facility

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

Percentage Profit on GDV	18.50%	(blended margin)
Percentage Profit on Cost	22.71%	
Peak Borrowing	£3,018,332	Interest Cover
Peak Equity Requirement	£2,052,769	IRR (before Finance Costs)
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

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