

Carmarthenshire Revised Local Development Plan Additional Sites Consultation



Representations Received



Carmarthenshire Revised Local Development Plan Additional Sites Consultation
Representations Received

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Additional Sites Consultation – All Representations Received

Representation Number and Respondent	Additional sites and Summary of Comment	Duly made or Not Duly Made
Representation 1 – Kieron McCullar	General comments on why are these developments so focused on the already heavily populated areas to the South of the county. The potential economic benefits to rural businesses and smaller communities should be weighted into the decision making.	Not Duly Made – Not related to an additional site
Representation 2 – Eric Jones	General comments relating to the additional site maps and street names	Not Duly Made – Not related to an additional site
Representation 3 – Mr Richard Jones	SeC6/(iii) Land at Fforest Road	Duly made – Objection to additional site
Representation 4 – Sarah Eyles	General Comment relating to the additional site consultation process	Not Duly Made – Not related to an additional site
Representation 5 - Adrian Thompson on behalf of Parc Emlyn Developments Limited	PrC3/(i) Emlyn Brickworks, Penygroes	Duly Made – Support for additional site
Representation 6 - Mr Mark Galbraith on behalf of Llanelli Rural Council	PrC2/(ii) Land at Cefncaeau, Llanelli	Duly made – Objection to additional site
Representation 7 - Mr Mark Galbraith on behalf of Llanelli Rural Council	PrC2/(iii) - Land at Pendderi Road, Bryn	Duly made – Objection to additional site
Representation 8 - Mr Mark Galbraith on behalf of Llanelli Rural Council	PrC2/(v) Land off Heol y Mynydd, Bryn	Duly made – Objection to additional site
Representation 9 - Adrian David John Pugh	PrC3/(v) Land off Parklands Road, Ammanford	Duly Made – Support for additional site
Representation 10 - Sian Williams	PrC3/(v) Land off Parklands Road, Ammanford	Duly Made – Support for additional site
Representation 11 – Cerith Lewis	PrC3/(v) Land off Parklands Road, Ammanford	Duly Made – Support for additional site
Representation 12 – Emyr John	PrC3/(vii) Land off Dôl y Dderwen Myddynfych	Duly made – Objection to additional site

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Representation 13 – Simon Mead	SeC15/(i) Land at Cilycwm Road, Llandovery	Duly made – Objection to additional site
Representation 14 – Anthony Jones	General comment regarding 2 additional sites being categorised into Ammanford, when actually they fall within Llandybie Community Council	Duly made – Objection to additional site
Representation 15 – Wyn Thomas	Respondent makes reference to the housing supply figure and its impact on the Welsh Language.	Not Duly made. Not related to an additional site
Representation 16 – John Jones	Commentary on unidentified sites within Burry Port / Pembrey and not associated to any additional sites.	Not Duly made. Not related to an additional site
Representation 17 – Sharon Meek	Objects to a site that is not part of the additional site consultation	Not Duly made. Not related to an additional site
Representation 18 – Anonymous	Welsh Water must upgrade any water treatment plants that will take any waste from the new developments	Not Duly made. Not related to an additional site
Representation 19 – Gavin Griffiths	PrC3(v) Tir-Y-Parc, Penybanc Land off Parklands Road, Penybanc, Ammanford	Duly Made – Support for additional site
Representation 20 – Roxanne Lawrence	Promotion of new site.	Not Duly made. Not related to an additional site
Representation 21 – James Scarborough, Geraint John Planning on behalf of Monica Davies	The respondent is promoting an alternative site, in doing so they provide general comments on the additional sites report, in particular against the commitments.	Not Duly made. Not related to an additional site
Representation 22 – Rob Mitchell, Carney Sweeney on behalf of Ffos Las Ltd	<p>The respondent provides a representation relating to the plan's housing supply and flexibility and questions the Council's approach to the selection of only three Reasonable Alternative sites.</p> <p>The respondent request the Inspectors seek a higher allowance to build rigour into the plan, given any additional sites will be at risk from the same delivery challenges as all other sites.</p>	Not Duly made. Not related to an additional site.

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	In doing so, they seek the inclusion of their candidate site SR/023/003.	
Representation 23 – Mr Paul Cromwell	Makes a general comment that the plan is not appropriate and also the plan has not delivered from 2004 up until the present date.	Not Duly Made - Not related to an additional site
Representation 24 – James Scarborough, Geraint John Planning on behalf of Ms H Wight, Ms C Dudleyke, and Ms G Searles)	The respondent is promoting an alternative site, in doing so they provide general comments on the additional sites report, in particular against the spatial distribution of development, and in relation to commitments identified within the additional sites consultation.	Not Duly Made - Not related to an additional site
Representation 25 – Mr C L Jones (Director JCR Planning LTD.)	The respondent references a number of sites, in doing so they provide general comments on the site selection process and the spatial distribution of sites. Comments are also made in relation to the use of committed sites in this	Not Duly Made - Not related to a particular additional site
Representation 26 - Mr C L Jones (Director JCR Planning LTD)	PrC3/(iv) Land Adjoining Maes Ifan, Maesquarre Road	Duly made – Objection to additional site
Representation 27 –Laura Greenman (HCR Law) on behalf of Leyton Harvard	Objects to multiple sites	Duly made – Objection to additional site
Representation 28 - Arthur	General Comment - Any sites need to be located where good public transport is available at least 1 bus per hour which limits locations. Unless any new location has public transport written into the planning application. No public transport no planning, this is to help and active net zero target.	Not Duly Made - - Not related to an additional site
Representation 29 – Jenna Arnold (CADW)	No comment to make but advise you use the services	Not Duly Made -

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	of Heneb to ensure that there are no unacceptable impacts on historic assets	
Representation 30 - AJ & ES Davies	PrC3(v) Land off Parklands Road Penybanc Ammanford	Duly Made - Support the inclusion of additional site
Representation 31 (a) - Arwel Evans	PrC2/(iii) - Land at Pendderi Road, Bryn	Duly made – Objection to additional site
Representation 31 (b) - Arwel Evans	PrC3/(i) - Emlyn Brickworks	Duly made – Objection to additional site
Representation 31 (c) - Arwel Evans	PrC3/(ix) Breakers Yard, Gorslas	Duly made – Objection to additional site
Representation 31 (d) - Arwel Evans	SeC7/(i) - Land at Pontarddulais Road, Llangennech	Duly made – Objection to additional site
Representation 31 (e) - Arwel Evans	SeC6/(iii) - Land at Fforest Road	Duly made – Objection to additional site
Representation 31 (f) - Arwel Evans	SeC3/(ii) Land at Monksford Street, Kidwelly	Duly made – Objection to additional site
Representation 31 (g) - Arwel Evans	SeC19/(i) Land Adjacent to the Beeches, Whitland	Duly made – Objection to additional site
Representation 31 (h) - Arwel Evans	Commentary on windfall sites and the requirement to undertake a new housing trajectory. Also comment on the promotion of their own land.	Not Duly made – Not related to the additional sites
Representation 32 – Welsh Government Transport	General comments relating to transport and new developments	Not Duly Made -Overarching comments but not related to any particular additional sites
Representation 33 - Melanie Lindsley, The Coal Authority	General Comments	Not Duly Made -Overarching comments but not related to any particular additional sites
Representation 34 - Jason Evans – Evans Banks Planning	PrC2-ii-Land adjacent to Cefncaeau, Llanelli	Duly made – Objection to additional site
Representation 35 - Jason Evans – Evans Banks Planning	PrC3-ii Land adjacent to Pant y Blodau	Duly made – Objection to additional site
Representation 36 - Gareth Barton, Turley on behalf of Tata Steel	PrC2-ii-Land adjacent to Cefncaeau, Llanelli	Duly Made – Support additional site
Representation 37 - Kate Harrison, Persimmon Homes	SeC6(iii) Land at Fforest Road	Duly Made – Support additional site

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Representation 38 - Kate Harrison, Persimmon Homes	Promote new site	Not Duly Made
Representation 39 - National Grid Electricity Transmission (NGET)	General Comments	Not Duly made – Not related to the additional sites
Representation 40 - Boyer Planning	Support additional site PrC2/(v) – Land off Heol y Mynydd but also seek increase in numbers	Duly Made
Representation 40(a) - Boyer Planning	PrC1/(iv) – Land off Trevaughan Road, Carmarthen	Duly Made – Objection to additional site
Representation 40(b) - Boyer Planning	SeC6/(ii) – Fforest Garage, Fforest	Duly Made – Objection to additional site
Representation 40(c) - Boyer Planning	SeC7/(i) - Land at Pontarddulais Road, Llangennech	Duly Made – Object to additional site
Representation 40(d) - Boyer Planning	PrC3/(ii) – Adjacent to Pant-y-Blodau, Penygroes;	Duly Made – Objection to additional site
Representation 40(e) - Boyer Planning	PrC3/(iv) – Land adjoining Maes Ifan, Maesquarre Road	Duly Made – Object to the additional site
Representation 40(f) - Boyer Planning	PrC3/(v) - Land off Parklands Road, Ammanford)	Duly Made – Objection to additional site
Representation 40(g) - Boyer Planning	SuV37(i) – Former Coedmor School, Cwmann	Duly Made – Objection to additional site
Representation 40(h) - Boyer Planning	SeC15/(i) Land at Cilycwm Road, Llandovery	Duly Made – Objection to additional site
Representation 41 – Richard Banks, Evans Banks Planning	SeC6-ii-Fforest Garage, Hendy	Duly Made – Objection to additional site
Representation 42 - Louise Edwards, Natural Resources Wales	All Sites	Duly Made - Commentary on every additional site
Representation 43 - R, H & D Jones	PrC2/(ii) – Land at Cefncaeau	Duly Made – Objection to additional site

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Representation 44 – R, H & D Jones	SeC6/(iii) Land at Fforest Road	Duly Made – Objection to additional site
Representation 45 – R, H & D Jones	SeC7/(i) – Land at Pontarddulais Road	Duly Made – Objection to additional site
Representation 46 – R, H & D Jones	PrC3/(vii) – Land off Dol Y Dderwen, Myddynfych	Duly Made – Objection to additional site
Representation 47 – R, H & D Jones	SuV25/(i) Cysgod yr Eglwys, Llannon	Duly Made – Objection to additional site
Representation 48 - Jason Evans, Evans Banks Planning	PrC3-ix Breakers Yard, Gorslas	Duly Made – Objection to additional site
Representation 49 – Trimsaran Rugby Club	Seek new site	Not Duly Made - Not related to the additional sites.
Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)	All additional	Duly Made - Commentary on every additional site

Summary Table

Additional Sites - Allocations	Representation Number and Respondent
Cluster 1	
PrC1/(iii) Land adjacent to 93 & 94 Abergwili Road, Carmarthen	Representation No 42 – Louise Edwards, Natural Resources Wales Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
PrC1/(iv) - Land off Trevaughan Road, Carmarthen	Representation No 40(a) – Boyer Planning on behalf of BDWH Representation No 42 – Louise Edwards, Natural Resources Wales Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
Cluster 2	
PrC2/(ii) Land at Cefncaeau, Llanelli	Representation No 6, Mr Mark Galbraith on behalf of Llanelli Rural Council Representation 27 –Laura Greenman (HCR Law) on behalf of Leyton Harvard Representation No 34 - Evans Banks Representation No 36 Gareth Barton, Turleys on behalf of Tata Steel Uk Ltd Representation No 42 – Louise Edwards, Natural Resources Wales Representation 43 – R, H & D Jones

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	Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
PrC2/(iii) - Land at Pendderi Road, Bryn	<p>Representation No 7 – Mr Mark Galbraith on behalf of Llanelli Rural Council</p> <p>Representation 31(a) – Mr Arwel Evans on behalf of RSAI</p> <p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
PrC2/(v) Land off Heol y Mynydd, Bryn	<p>Representation No 8 - Mr Mark Galbraith on behalf of Llanelli Rural Council</p> <p>Representation 40 – Boyer Planning on behalf of Barrat David Wilson Homes</p> <p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
SeC6/(ii) Fforest Garage, Fforest	<p>Representation 27 –Laura Greenman (HCR Law) on behalf of Leyton Harvard</p> <p>Representation 40(b) - Boyer Planning on behalf of Barratt David Wilson Homes</p> <p>Representation No 41, Evans Banks</p>

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	<p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
SeC6/(iii) Land at Fforest Road	<p>Representation No 3 – Mr Richard Jones</p> <p>Representation No 31(e) Mr Arwel Evans (Lichfields) on behalf of RSAI;</p> <p>Representation No 37 – Kate Harrison, Persimmon Homes</p> <p>,</p> <p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 44 – R, H & D Jones</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
SeC7/(i) Land at Pontarddulais Road	<p>Representation 31(d) Mr Arwel Evans (Lichfields) on behalf of RSAI;</p> <p>Representation 40(c) – Boyer Planning on behalf of BDWH</p> <p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation No 45 – R, H & D Jones</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>

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Cluster 3	
PrC3/(i) Emlyn Brickworks, Penygroes	<p>Representation No 5 - Adrian Thompson on behalf of Parc Emlyn Developments Limited</p> <p>Representation No 31(b) – Arwel Evans Lichfields on behalf of RSAI</p> <p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
PrC3/(ii) Adjacent to Pant-y-Blodau, Penygroes	<p>Representation 27 –Laura Greenman (HCR Law) on behalf of Leyton Harvard</p> <p>Representation No 35 – Jason Evans, Evans Banks Planning</p> <p>Representation No 40(d) – Boyer Planning on behalf of Barratt David Wilson Homes South Wales</p> <p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
PrC3/(iv) Land adjoining Maes Ifan, Maesquarre Road	<p>Representation No 26 – Mr C L Jones (Director JCR Planning LTD.) on behalf of MR I Jones</p> <p>Representation No 40(e) – Boyer Planning on behalf of Barratt David Wilson Homes South Wales</p>

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	<p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
PrC3/(v) Land off Parklands Road, Ammanford	<p>Representation No 9 - Adrian David John Pugh</p> <p>Representation No 10 - Sian Williams</p> <p>Representation No 11 – Cerith Lewis</p> <p>Representation No 19 – Gavin Griffiths</p> <p>Representation No 30 – AJ & ES Davies</p> <p>Representation No 40(f) – Boyer Planning on behalf of Barratt David Wilson Homes South Wales</p> <p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
PrC3/(vii) Land off Dôl y Dderwen Myddynfych	<p>Representation Nos 12 – Emyr John</p> <p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 46 – R, H & D Jones</p>

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	Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
PrC3/(viii) Land r/o 108 - 114 Waterloo Road	Representation No 42 – Louise Edwards, Natural Resources Wales Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
PrC3/(ix) Breakers Yard, Gorslas	Representation 27 – Laura Greenman (HCR Law) on behalf of Leyton Harvard Representation No 31(c) – Arwel Evans, Lichfields on behalf of RSAI Representation No 48 – Jason Evans, Evans Banks Planning Representation No 42 – Louise Edwards, Natural Resources Wales Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
Cluster 6	
SuV59/(i) North East of Bancyfelin School	Representation No 42 – Louise Edwards, Natural Resources Wales Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
Additional Site - Commitments	
Cluster 1	

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PrC1/(i) Former Lidl, Priory Street, Carmarthen	Representation No 42 – Louise Edwards, Natural Resources Wales Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
PrC1/(ii) Land south of Pant Glas, Carmarthen	Representation No 42 – Louise Edwards, Natural Resources Wales Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
SeC1/(i) Black Horse, Meinciau	Representation No 42 – Louise Edwards, Natural Resources Wales Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
SuV2/(i) Land at Maes y Meillion, Llanybri	Representation No 42 – Louise Edwards, Natural Resources Wales
Cluster 2	
PrC2/(i) Land adj 91 Maes yr Haf, Pwll	Representation No 42 – Louise Edwards, Natural Resources Wales Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
SeC3/(i) Land opposite Parc Pendre, Kidwelly	Representation No 42 – Louise Edwards, Natural Resources Wales Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)
SeC3/(ii) Land at Monksford Street, Kidwelly	Representation 31(f) Arwel Evans, Lichfields on behalf of RSAI

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	<p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
SeC6/(i) Land off Heol y Parc, Hendy	<p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
Cluster 3	
PrC3/(iii) Land at rear of 10-12 Norton Road, Penygroes	<p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
SuV25/(i) Cysgod yr Eglwys, Llannon (Adj St Nons Church)	<p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation No 47 – R, H & D Jones</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
PrC3/(vi) Land opposite Plough & Harrow, Ammanford	<p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
Cluster 4	

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SuV37/(i) Former Coedmor School, Cwmann	<p>Representation No 40(g) Boyer Planning on behalf of Barratt David Wilson Homes</p> <p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
Cluster 5	
SeC15/(i) Land at Cilycwm Road, Llandovery	<p>Representation No 13 – Simon Mead</p> <p>Representation 40(h) – Boyer Planning on behalf of Barratt David Wilson Homes</p> <p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>
Cluster 6	
SeC19/(i) Land Adjacent to the Beeches, Whitland	<p>Representation 31(g) - Arwel Evans, Lichfields on behalf of RSAI</p> <p>Representation No 42 – Louise Edwards, Natural Resources Wales</p> <p>Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)</p>

Representations – Revised Local Development Plan Additional Sites Consultation

Representation 1 - Kieron McCullar - Not Duly Made

Q1 – Details

Name: Kieron McCullar

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication. No answer

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

All as it is general comments

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

I think the LDP is sound and meets procedural requirements

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further

information to the examination if the Inspectors invites you to address matters that they may raise.

I believe the LDP meets the procedural requirements. My observation and question is why these developments are so focused on the already heavily populated areas to the south of the County. The potential economic benefits to rural businesses and smaller communities should be weighted into the decision making.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a)Does the Plan fit?

b)Is the Plan appropriate?

c)Will the Plan deliver?

No answer

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Representation 2 - Eric Jones – Not Duly Made

Q1 – Details

Name: Eric Jones

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication. Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Pwynt cyffredinol sy gen i.

I have a general comment

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

No answer

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

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Mae sawl un o'r mapiau yn brin iawn o enwau strydoedd / adeiladau, sy'n ei gwneud hi'n anodd dros ben i adnabod y lleoliadau penodol.

Several of the maps are very short of street/building names, which makes it extremely difficult to identify the specific locations.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

Wedi gwneud fy mhwynt, diolch!

I have made my point, thanks!

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

No answer

Representation 3 - Richard Jones

Q1 – Details

Name: Richard Jones

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Enw'r Safle / Site Name: Tir ar Heol Fforest / Land at Fforest Road Anheddiad /
Settlement: Yr Hendy / Hendy Cyf. Ymgynghori / Consultation Ref.: SeC6/(iii)

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

I think the LDP is unsound and should be changed

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

Suitability of land; 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.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

Further to above. Road Traffic measures. The additional housing will place increased pressure on Fforest road and traffic through Hendy past a primary school. There is already a considerable bottleneck at the mini roundabout and congestion on a narrow road with parking reducing the road to 1 lane almost permanently.

Development plans require traffic measuring for over 100 houses, these builds in addition to what persimmon have already built will exceed that, in building in prolonged phases it circumvents these requirements and ignores road safety issues. There is suitable land closer to Pont Abraham which can support this pressure on the road network.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

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Representation 4 – Sarah Eyles – Not Duly Made

Q1 – Details

Name: Sarah Eyles

Address: [REDACTED]

Organisation: ICSL

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Both

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

I have a general comment. Are these the only sites to be added? I assume there can be no representation from developers or landowners for any additional sites. If this is not the case please let me know. A local landowner was trying to get their inappropriately situated land in Llanfihangel-Ar-Arth added, and I now assume that they can no longer do so, as it is not included on this list.

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is sound and meets procedural requirements."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

Only if there is only this land as outlined on your report included. I think you should listen to locals, however, in case some of these areas have wildlife habitat or other reasons for not being included in your plan.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a)Does the Plan fit?

b)Is the Plan appropriate?

c)Will the Plan deliver?

It will only fit and deliver if locals buy into it and housing isn't too expensive for local people.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Representation 5 – Adrian Thompson (Lightwater TPC)

Q1 – Details

Name: Adrian Thompson

Address: [REDACTED]

Organisation: Lightwater TPC

Contact details: [REDACTED]

Q2 - Are you representing a client? Yes

Client Name: Colum Carty, Director

Client Address: [REDACTED]

Client Contact Details: [REDACTED]

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

PrC3/(i) Emlyn Brickworks, Penygroes for an additional 50 dwellings.

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

I think the LDP is sound and meets procedural requirements

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

Parc Emlyn Developments Limited supports the uplift in numbers proposed for the allocation at the former Emlyn Brickworks site. The former Emlyn Brickworks is one of two sites the subject of this consultation which are not new sites but existing proposed allocations which would see an increase in the number of homes to be delivered during the Plan period. An extension to the allocation area has been proposed at the former Emlyn Brickworks, which may be subject to further consultation.

No concerns have been raised about the proposed allocation in itself, as set out in the deposit version of the Plan. It is considered to support the Plan overall, helping it to meet all three tests of soundness. Against that background, the proposed uplift in numbers is not considered to raise any issues in respect of the first two tests of soundness ('does the plan fit' and 'is the plan appropriate'). Both will still be met. In respect of the third test ('will the plan deliver'), 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 Borough 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. The uplift is not contingent on confirmation of the proposed extension to the site allocation area but the extension would further strengthen the site's ability to deliver. The addendums to both the Integrated Sustainability Appraisal and the Habitat Regulations Assessment show the site still performs positively with the increase in numbers. The proposed uplift in housing numbers at the former Emlyn Brickworks will reinforce the effectiveness of the Plan by helping to ensure it will deliver the Borough housing

requirement over the Plan period. As such it helps the Plan to meet the third test of soundness.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

The proposed uplift in numbers at Emlyn Brickworks will help the Plan to achieve all three tests of soundness, for the reasons already set out above.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

No answer

Representation 6 – Mark Galbraith

Q1 – Details

Name: Mark Galbraith

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

- PrC2(ii) Land at Cefncaeau, Llanelli – 91 units

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

I think the LDP is sound and meets procedural requirements

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

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

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key public services such as school provision places, and local access to dental and GP services.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

The inclusion of the site does not satisfy soundness tests A + B.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Representation 7 – Mark Galbraith

Q1 – Details

Name: Mark Galbraith

Address: [REDACTED]

Organisation: Llanelli Rural Council

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

- PrC2 (iii) Land at Pendderi Road, Bryn – 35 units

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is sound and meets procedural requirements."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further

information to the examination if the Inspectors invites you to address matters that they may raise.

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.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

The inclusion of the site does not meet soundness tests A + B.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Representation 8 - Mark Galbraith

Q1 – Details

Name: Mark Galbraith

Address: [REDACTED]

Organisation: Llanelli Rural Council

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

- PrC2 (v) Land off Heol Y Mynydd, Bryn – 80 units

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is sound and meets procedural requirements."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further

information to the examination if the Inspectors invites you to address matters that they may raise.

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.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

The inclusion of the site does not meet soundness tests A + B.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Representation 9 – Adrian David John Pugh

Q1 – Details

Name: Adrian David John Pugh

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Both

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

site ref: PrC3/(V) Site name: Tir Y Parc Penybanc Land off Parklands Road
Penybanc Ammanford

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is sound and meets procedural requirements."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

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Being the nearest neighbour to the land off Parklands Road Penybanc PrC3(v) I write to fully support its inclusion in the LDP. I am aware that the land is readily available and deliverable. There are no other development sites or opportunities to build within the Parklands Road, Penybanc, area for either local people or any newcomers which are immediately available. Its inclusion would greatly benefit and support families to set up home and remain living locally. As only 9 dwellings have been submitted for consideration, I feel strongly that if granted they would not have any detrimental or significant impact on overpopulating the area. My knowledge of the immediate area is that there are ongoing retail and employment opportunities. The site is within walking distance (250m) to bus routes, recreational facilities, the community hall, public footpaths and park walks as well as a train station and the regular bus services. The new development would be conveniently located within Penybanc and would help to sustain the existing community facilities. I am aware that the landowners are very involved in supporting the local community's various activities and are knowledgeable and understanding of the local people's needs and wellbeing which I'm sure they would wholeheartedly consider. The inclusion of the land would also help to promote the Welsh language with opportunities for the residents to promote, learn or enhance their language skills. I fully support the inclusion of the land within the Revised Plan, as it is both sound and appropriate for the area.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

Yes the plan is fit Yes the plan is appropriate Yes the plan will deliver

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

No answer

Representation 10 – Sian Williams

Q1 – Details

Name: Sian Williams

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

The location of the land along Parklands Road, referred to as PrC3/v, with established residential development opposite and to both sides, and where there are seemingly no physical or environmental restrictions, represents a logical yet modest extension to the existing housing within Penybanc. Occupiers of houses at the site would enjoy the benefit of all mains services including fast fibre broadband, convenient access to the village shops, post office, hall and recreational facilities, a public footpath link to Ammanford and convenient, walking distance to the bus stops for both the Swansea and Carmarthen services. The allocation of the site for housing, that would help to sustain the existing community facilities and also result in a significant financial contribution towards affordable housing in the locality, is clearly appropriate for the area. As the owner of the property addressed 37 Parklands Road, adjacent to the above location, I firmly support the inclusion of the additional site within the Revised Development Plan.

site ref: PrC3/(V) Site name: Tir Y Parc Penybanc Land off Parklands Road
Penybanc Ammanford

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is sound and meets procedural requirements."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

No answer

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a)Does the Plan fit?

b)Is the Plan appropriate?

c)Will the Plan deliver?

Yes it is fit, appropriate and deliverable.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

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"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Representation 11 – Cerith Lewis

Q1 – Details

Name: Cerith Lewis

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Site Ref PrC3(v) Land off Parklands Road , Penybanc , Ammanford.

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is sound and meets procedural requirements."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

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Having noted that it is proposed to consider the inclusion of the frontage of the land to the south of number 54 Parklands Road, Penybanc, Ammanford is within the development limit of the area, I write to inform you that I support the inclusion of the land for the following reasons. The location is within a short walking distance to regular public transport stops for Ammanford, Swansea & Carmarthen & within short distance to the train station. With the land being close to the village which has recreational facilities, community hall, post office, convenience store among other small businesses & importantly the area is well supported by primary & secondary schools. This land has the advantage of being opposite to a public footpath which gives a pleasant walking & cycling route to Ammanford & its facilities. The land seems to be readily available for development & would appear as a natural continuation of the built up area at the heart of the village. As bungalows &/or Dorma bungalows are very rarely marketed this development would be advantageous to the local area & much sought after. The inclusion of the land within the Revised Plan is sound & appropriate for the area.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

Yes it meets a, b & c soundness tests.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

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"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Representation 12 - Emyr John

Q1 – Details

Name: Emyr John

Address: [REDACTED]

Contact details: No details included

Q2 - Are you representing a client? Not specified

Q3 - Preferred method of communication: Letter

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Land off Dôl y Dderwen, Myddynfych, Ammanford PrC3/(vii)

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is unsound and should be changed.", "I think that the procedural requirements have not been met."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

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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 - Construction of 28 residential units - Land at former Myddynfych Farm (Phase 2) - particularly with the Head of Highways and Head of Planning at the time (please let me know if this needs to be sent to you again). This info was also provided when considering application No E/16694. There is a real danger that should an accident happen near the play park off Heol Llwyd (and there have been many in years gone by) which meant that the road was closed for a period of time (child going to the park knocked down etc), a further emergency (person having heart attack etc) in a property off Heol Llwyd, Riverway, Gwaun Henllan and the whole of the Dolydderwen Estate would not be able to be accessed - fire engines etc This means that over 200 houses are unsafe. It is surprising that your Highways department have not provided advice in this respect when this allocation has been considered (making the LDP unsound and therefore the proposals changed) and especially when application no PL/06515 was being considered. They certainly have information on their files - and the matter is highlighted by CCC's Formal Planning Section in their advice - see attached. Given that the land is not allocated for development in the LDP, these highway matters should have greater weight when considering this allocation in the LDP and the application for development (which has undermined this LDP process) should not have been approved. This is the procedural requirement aspect of this submission. No further allocation of land in this field should be made without a secondary access point being created.

Q7, 8, 9 – Attachments in File

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b)Is the Plan appropriate?

c)Will the Plan deliver?

a) - does not propose allocation of a site that is safe due to highway matters b) - the plan has been undermined by approval of an application before the site is allocated for development in the LDP

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I want to speak at a potential future hearing session."

Q12 - If you wish to speak at a potential future hearing session, it would be helpful if you could indicate in which language you would like to be heard.

I wish to be heard in English

Representation 13 – Simon Mead

Q1 – Details

Name: Simon Mead

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

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

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is sound and meets procedural requirements."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

No answer

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a)Does the Plan fit?

b)Is the Plan appropriate?

c)Will the Plan deliver?

No answer

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Representation 14 - Anthony jones

Q1 – Details

Name: Anthony Jones

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Settlements of Ammanford in wrong category I.E. Parklands, Dol y dderwen, comes under Llandybie Community Council as known locally. Calling it Ammanford settlement gives wrong interpretations to local understanding.

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think that the procedural requirements have not been met."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

No answer

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

Consultation does meet local knowledge understanding, for Ammanford area.
Unfortunately unsurprising with CCC these days.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Representation 15 - Wyn Thomas – Not Duly Made

Q1 – Details

Name: Wyn Thomas

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Mae'n anodd gwneud sylw ar bob safle yn unigol gan nad yw ystyr "Sgrinio Mewn " a "Sgrinio Allan" yn glir.

It is difficult to comment on each site individually as the meaning of 'Screened In' and 'Screened Out' is unclear.

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is unsound and should be changed."

"Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid"

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

Ym mis Hydref, fel aelod o Dyfodol i'r laith, gwnes y pwynt bod y CDLI heb fod yn gadarn gan ei fod yn debygol iawn o wanhau'r Gymraeg yn y sir. Mae hyn yn groes i un adran o Ddeddf Llesiant Cenedlaethau'r Dyfodol ac hefyd "Cymru'r Dyfodol, y Cynllun Cenedlaethol 2040" - sydd am weld amodau i'r Gymraeg ffynnu. Mae'n dilyn felly bod caniatáu rhagor o safleoedd a rhagor o dai, ar ben yr 8,822 y bwriedir eu hadeiladu, yn sicr o fod yn hoelen arall yn arch y Gymraeg yn y sir.

In October, as a member of Dyfodol i'r laith, I made the point that the LDP is unsound because it is highly likely to weaken the Welsh language in the county. This runs contrary to a section of the Well-being of Future Generations Act as well as "Wales 2040, the National Plan" — which aims to create conditions for the Welsh language to thrive. It follows, therefore, that allowing more sites and more housing, on top of the 8,822 already planned, is certainly another nail in the coffin for the Welsh language in the county.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

Carmarthenshire Revised Local Development Plan Additional Sites Consultation
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Nid yw'r CDLI yn briodol i Sir Gaerfyrddin. Bydd y cynnydd yn y boblogaeth yn rhoi rhagor o bwysau ar y gwasanaethau cymdeithasol megis ysbytai a meddygon sydd eisoes yn gwegian. Mar'r CDLI hefyd yn berygl mawr i'n nhiaith genedlaethol sydd wedi dirywio yn sylweddol dros ugain mlynedd - 50.8% o siaradwyr Cymraeg yn 2001, dim ond 39.9% erbyn 2021. Mae dogfennau'r Adran Cynllunio yn cydnabod bod y twf yn y boblogaeth oherwydd mewnfudo. Yn 2021, roedd 26.4% o boblogaeth y sir wedi eu geni "tu allan i Gymru" Mae'r cynnydd yn y boblogaeth, oherwydd mewnfudo, wedi digwydd er bod mwy wedi marw na cael eu geni bob blwyddyn ers 2000. Felly, bydd caniatáu dim ond un o'r safleoedd a nodwyd heb sôn am bob un yn sicr o waethygu sefyllfa'r Gymraeg gan mai darparu ar gyfer pobl di-Gymraeg bydd y safleoedd

The LDP is not appropriate for Carmarthenshire. The population increase will place additional pressure on social services such as hospitals and doctors, which are already overstretched. The LDP also poses a serious threat to our national language, which has declined significantly over the past twenty years — from 50.8% Welsh speakers in 2001 to just 39.9% in 2021. Planning documents acknowledge that population growth is due to immigration. In 2021, 26.4% of the county's population were born "outside Wales." This population increase, driven by immigration, has occurred despite more people dying than being born each year since 2000. Therefore, allowing even one of the identified sites, without mention of all others, will certainly worsen the situation for the Welsh language because these sites will provide for non-Welsh-speaking populations.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

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*“Nid wyf am siarad mewn sesiwn gwrandawriad bosibl yn y dyfodol ac rwyf yn fodlon
i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd”*

Representation 16 – John Jones – Not Duly Made

Q1 – Details

Name: John Jones

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Both

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Burry Port Pembrey

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is unsound and should be changed."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

Burry Port. Outside the Town limits and forms remote housing development away from any settlement. Pembrey, Garreg Lwyd. Access of A484 already congested.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

Burry Port : Development not adjacent to any other housing. Remote development.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Q12 - If you wish to speak at a potential future hearing session, it would be helpful if you could indicate in which language you would like to be heard.

I wish to be heard in English

Representation 17 – Sharon Meek - Not Duly Made

The respondent objects to the inclusion of site Prc2/h10 – Land adjacent to the Dell, stating that surface water flooding and an impact on the entrance to the land and nearby properties. In addition the wildlife occupies the green area.

Council note - This representation was submitted through the online survey in response to the ISA and HRA Additional Sites Addendum consultation. However, the content of the submission is more appropriately related to the Revised LDP Additional Sites consultation, and it has therefore been included under this consultation. The representation is not duly made as it considered a site that is not part of the additional site consultation

Representation 18 – Anonymous – Not Duly Made

Q1 – Details

Name: Not supplied

Address: Not supplied

Contact details: Not supplied

Q2 - Are you representing a client? No answer

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Before any work starts anywhere Welsh Water must upgrade any water treatment plants that will take any waste from the new developments along with gps and stop reducing any hospital services otherwise just shoot anyone over 67.

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is sound and meets procedural requirements."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further

information to the examination if the Inspectors invites you to address matters that they may raise.

No answer

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a)Does the Plan fit?

b)Is the Plan appropriate?

c)Will the Plan deliver?

No answer

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Representation 19 – Gavin Griffiths

Q1 – Details

Name: Gavin Griffiths

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Consultation Reference: PrC3(v) Site Name: Tir-Y-Parc, Penybanc Land off Parklands Road, Penybanc, Ammanford

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is sound and meets procedural requirements."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

I think the LDP is sound and meets the procedural requirements wholly.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

The proposed addition of the parcel of land at Parklands Road referenced PrC3/(v) is clearly appropriate to the area as it is located within the established built environment with housing to the front and to both sides. The land is located in close proximity to the community social, retail, commercial and recreational facilities within the village, walking distance to Ammanford, the third largest town in the county and service hub for the Amman Valley, and also walking distance to the bus and train public transport links to Carmarthen, Swansea and beyond. Noting that the land has no designated physical or environmental constraints the site could apparently be brought forward quickly to provide both much sought self-build opportunities and financial contributions towards affordable housing in the locality. It would seem that the residential development could be served by a shared, sustainable drainage system, and afford the opportunity to significantly increase the biodiversity value through the provision of sensitive landscaping utilising indigenous species. The proposed allocation for residential development, that would appear to be readily available/deliverable, positively contributes to the soundness of the plan. I fully support the proposed inclusion of the additional site within the revised plan.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

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No answer

Q12 - If you wish to speak at a potential future hearing session, it would be helpful if you could indicate in which language you would like to be heard.

"I wish to be heard in English"

Representation 20 – Roxanne Lawrence – Not Duly Made

Q1 – Details

Name: Roxane Lawrence

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Both

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Enclosure 9005 myddynfych farm myddynfych drive ammanford. I would be grateful if you would reinclude this site. It is very close to Ammanfird and is an excellent infil site. Plots here are very much needed. All mains services are here including gas. Reincluion of this site would help the local plan provide enough houses to meet area needs

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

No answer

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further

information to the examination if the Inspectors invites you to address matters that they may raise.

Not enough land for development included in the plan boundaries

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

No answer

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I want to speak at a potential future hearing session."

Q12 If you wish to speak at a potential future hearing session, it would be helpful if you could indicate in which language you would like to be heard.

"I wish to be heard in English"

Representation 21 - James Scarborough (GJP) – Not Duly Made

Q1 – Details

Name: James Scarborough

Address: [REDACTED]

Organisation: GJP

Contact details: [REDACTED]

Q2 - Are you representing a client? Yes

Client Name: Monica Davies

Client Address: C/O Agent

Client contact details: C/O Agent

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

No answer

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is unsound and should be changed."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

Please see supporting documents

Q7,8,9 – Attachments in file

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a)Does the Plan fit?

b)Is the Plan appropriate?

c)Will the Plan deliver?

Please see supporting documents

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I want to speak at a potential future hearing session."

Q12 If you wish to speak at a potential future hearing session, it would be helpful if you could indicate in which language you would like to be heard

"I wish to be heard in English"

Representation 22 – Rob Mitchell (Carney Sweeney) Not Duly Made

Q1 – Details

Name: Rob Mitchell

Address: [REDACTED]

Organisation: Carney Sweeney

Contact details: [REDACTED]

Q2 - Are you representing a client? Yes

Client Name: Ffos Las Ltd

Client Address: C/O Agent

Client contact details: C/O Agent

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Please see accompanying Representation letter

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is unsound and should be changed."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

Please see submitted Representation letter

Q7,8,9 – Attachments in file

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a)Does the Plan fit?

b)Is the Plan appropriate?

c)Will the Plan deliver?

Please see submitted Representation letter

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I want to speak at a potential future hearing session."

Q12 If you wish to speak at a potential future hearing session, it would be helpful if you could indicate in which language you would like to be heard

"I wish to be heard in English"

Representation 23 – Paul Cromwell - Not Duly Made

Q1 – Details

Name: Paul Cromwell

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Letter

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

LDP general comment

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is unsound and should be changed.", "I think that the procedural requirements have not been met."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

I have spoken to the inspectorate on the 5/11/24 regarding sites suv18 and suv17 again you have placed these site into the LDP and these sites are originally from the UDP over many years .

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a)Does the Plan fit?

b)Is the Plan appropriate?

c)Will the Plan deliver?

The plan does not fit , The plan is not appropriate and also the plan has not delivered from 2004 up until the present date

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I want to speak at a potential future hearing session."

Q12 If you wish to speak at a potential future hearing session, it would be helpful if you could indicate in which language you would like to be heard

"I wish to be heard in English"

Representation 24 – James Scarborough (GJP) – Not Duly Made

Q1 – Details

Name: James Scarborough

Address: [REDACTED]

Organisation: GJP

Contact details: [REDACTED]

Q2 - Are you representing a client? Yes

Client Name: Ms H Wight, Ms C Dudlyke, and Ms G Searles

Client Address: C/O Agent

Client contact details: C/O Agent

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

No answer

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is unsound and should be changed."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

Please see submitted documents

Q7,8,9 – Attachments in file

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a)Does the Plan fit?

b)Is the Plan appropriate?

c)Will the Plan deliver?

Please see submitted documents

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I want to speak at a potential future hearing session."

Q12 If you wish to speak at a potential future hearing session, it would be helpful if you could indicate in which language you would like to be heard

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"I wish to be heard in English"

Representation 25 - Mr C L Jones (Director JCR Planning LTD.) – Not Duly Made

Q1 – Details

Name: Mr C L Jones

Address: [REDACTED]
[REDACTED]

Organisation: JCR PLANNING LTD.

Contact details: [REDACTED]

Q2 - Are you representing a client? Yes

Client Name: MULTIPLE

Client Address: C/O Agent

Client contact details: C/O Agent

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

VARIOUS SITES

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is unsound and should be changed.", "I think that the procedural requirements have not been met."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN (LDP) 2018 – 2033 OJECTION TO ADDITIONAL SITES CONSULTATION MARCH 2025 The following provides an overarching response in respect of those “additional sites” included within the document entitled “Additional Sites Consultation”, dated March 2025, and hereby comprises a formal OBJECTION to that document. The Local Planning Authority formally advised on the 27th March 2025 that the Planning Inspectors conducting the Examination had instructed Carmarthenshire County Council:- “...to find additional housing sites to be identified within the Revised LDP...”. The purpose of this objection is to highlight the unsound assumptions underlying the ‘Additional Sites Consultation’ exercise. In the first instance, it is apparent that the 27th March 2025 instruction given by the Inspectors to the Council has not been properly undertaken. The instruction specifically requested the LPA “...to find additional housing sites..”. Of the 30 ‘additional’ sites listed in the consultation document, the majority are already within the land use framework for the county, having either an extant planning permission, being under construction, being previously developed land or within urban areas, which would likely have come forward as ‘windfall’ opportunities. Thus, there is potentially an element of double-counting. In the interests of fairness, many, if not all, of the 16 “potential commitment sites” should have been identified and included within the housing calculations prior to the deposit stage. It is not proper to now suddenly claim, for example, that the ‘Cysgod yr Eglwys’ site at Llannon (SuV25/(i)), which was granted permission over eight years ago and which is nearing completion, should be classed as a new allocation. Likewise, the ‘Land adjacent to The Beeches’ site at Whitland (SeC19/(i)) has had consent for a number of years, as indeed has the ‘Land opposite Plough and Harrow’ site at Ammanford (PrC3/(vi)). There are a number of other sites which

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have extant permission or are brownfield and which should have been afforded full development recognition prior to the deposit stage. In effect, it is difficult to accept how the majority of these 16 “potential commitment sites” can be truly described as “...additional housing sites to be identified within the Revised LDP...”. It is respectfully suggested therefore, that an additional exercise be undertaken, whereby the spirit of plan-making can be satisfied, by way of the allocation of actual newly allocated development sites. Secondly, there is considerable spatial disparity amongst the 30 identified ‘additional sites’, with the Tywi valley and the middle rural section of Carmarthenshire being largely ignored. If one of the purposes of the LDP is to drive economic investment in rural areas, such disregard for these rural communities, is a basic weakness. Thirdly, there is a suggestion within the document that the housing allocation figure is already ‘cut and dried’. It would appear that the Inspectors have already accepted the requirement for 9704 dwellings within the plan period and are now only seeking to alter the % flexibility figure and not the underlying allocation. Furthermore, the fact that objectors or their representatives seeking the allocation of their land within the development plan framework were not permitted to speak at the Examination is lamentable and does not serve the planning process.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

The plan does not meet b and c.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

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"I want to speak at a potential future hearing session."

Q12 If you wish to speak at a potential future hearing session, it would be helpful if you could indicate in which language you would like to be heard

"I wish to be heard in English"

Representation 26 - Mr C L Jones (Director JCR Planning LTD)

Q1 – Details

Name: Mr C L Jones

Address: [REDACTED]
[REDACTED]

Organisation: JCR PLANNING LTD.

Contact details: [REDACTED]

Q2 - Are you representing a client? Yes

Client Name: MR I JONES

Client Address: C/O Agent

Client contact details: C/O Agent

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

PrC3/(iv) LAND ADJOINING MAES IFAN, MAESQUARRE ROAD

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is unsound and should be changed.", "I think that the procedural requirements have not been met."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN (LDP) 2018 – 2033 OBJECTION TO ADDITIONAL SITES CONSULTATION MARCH 2025 The following comprises a formal objection made in respect of the “Additional Sites Consultation” document, dated March 2025, and specifically objects to PrC3/(iv) LAND ADJOINING MAES IFAN, MAESQUARRE ROAD. The objection is primarily based on - 1. Site viability - there is little evidence to suggest that the site will come forward during the plan period. 2. Inadequacy of the highway network in the vicinity of the site - it is a common occurrence for significant levels of vehicle congestion to occur at this location, giving rise to impeded traffic flow and highway safety issues. 3. Amenity – there are amenity issues associated with its proposed development. 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. The continued inclusion of this site is blocking and preventing the development of other more appropriate residential schemes in this part of Betws/Ammanford.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

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The plan does not meet b and c.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I want to speak at a potential future hearing session."

Q12 If you wish to speak at a potential future hearing session, it would be helpful if you could indicate in which language you would like to be heard

"I wish to be heard in English"

Representation 27 - Laura Greenman (HCR Law)

Q1 – Details

Name: Laura Greenman

Address: [REDACTED]
[REDACTED]

Organisation: HCR Law

Contact details: [REDACTED]

Q2 - Are you representing a client? Yes

Client Name: Leyton Harvard

Client Address: [REDACTED]
[REDACTED]

Client contact details: C/O Agent

Q3 - Preferred method of communication: Both

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

No answer

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think the LDP is unsound and should be changed"

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further information to the examination if the Inspectors invites you to address matters that they may raise.

We are instructed by Mr Harvard. We write to reiterate and second the objection that has been submitted to 4 of the proposed additional sites by Richard Bank of Evans Banks Planning, 2 Llandeilo Road, Cross Hands, Carmarthenshire, SA14 6NA on 15 May 2025. We write on behalf of our client to formally record our client's objection to the additional sites on the same basis as that set out in the objection of Evans Banks Planning. For the reasons already outlined in that objection, it is contended that 4 of the proposed additional sites are not suitable for inclusion in the LDP. On this basis, further sites should be identified to achieve the additional 882 homes required to ensure that there is sufficient provision to meet housing need. Consequently, we would suggest that the LDP does not meet the test of soundness. Our client has a site for which planning permission has been obtained (in part) and is being actively sought in respect of the delivery of further new homes within the Carmarthenshire area and in due course would hope that their site could be considered as an additional site.

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a) Does the Plan fit?

b) Is the Plan appropriate?

c) Will the Plan deliver?

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It is considered that the proposed additional sites do not meet any of the above three tests on the basis that 4 of the proposed additional sites are not suitable for inclusion in the LDP and the level of housing need has not therefore been properly provided for.

Q11 – If you are objecting to the inclusion of any additional sites, would you wish to appear at a potential future hearing session?

"I do not want to speak at any potential hearing session and I am happy for my written representation to be considered by the Inspector."

Representation 28 – Arthur – Not Duly Made

Q1 – Details

Name: Arthur

Address: [REDACTED]

Contact details: [REDACTED]

Q2 - Are you representing a client? No

Q3 - Preferred method of communication: Email

Q4 - In your response below, please specify which additional site you are commenting on? There will be an opportunity for you to set out your comments later in the survey. Please note that you will need to submit an individual representation for each additional site:

Any sites needs to be located where good public transport is available at least 1 bus per hour which limits locations . Unless any new location has public transport written into the planning application. No public transport no planning, this is to help and active net zero target.

Q5 - Before you set out your comments in detail, it would be helpful to know whether you think the inclusion of the additional site makes the Plan sound and meets the procedural requirements.

"I think that the procedural requirements have not been met."

Q6 - Please set out your detailed comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. You will only be able to submit further

information to the examination if the Inspectors invites you to address matters that they may raise.

No answer

Q10 - Please indicate which soundness test(s) the LDP meets or does not meet, and why this will help the Authority and the Inspector to understand the issues you raise. The three soundness tests are;

a)Does the Plan fit?

b)Is the Plan appropriate?

c)Will the Plan deliver?

No answer

Q11 – If you are objecting to the inclusion of any additional sites, would you **wish to appear at a potential future hearing session?**

Not answer

Reps Received via Email:

Representation 29 - Jenna Arnold - Cadw – Not Duly Made

Cadw have no comments but we advise you use the services of Heneb to ensure that there are no unacceptable impacts on historic assets.

Please note, the Cadw mailbox is no longer in use. Please send any future consultations to [REDACTED]

Representation 30 - AJ & ES Davies

PrC3(v) Land off Parklands Road Penybanc Ammanford

We fully support the addition of the site PrC3(v) within the Revised Local Development Plan.

In terms of the soundness of the proposed allocation, the site is readily deliverable and being conveniently located at the heart of the village, in walking distance to the community hall, convenience shops, post office and recreational facilities, it is appropriate to the area.

A public footpath directly opposite the south-eastern corner of the site provides for a pleasant, woodland walk to Ammanford, while bus stops within comfortable walking distance, 250m and 350m respectively, provide access to the regular Swansea and Carmarthen services.

The land, that is largely grade 5, 'very poor-quality agricultural land' has existing housing to both sides and along the opposite side of the road. Planning permission for a single plot was granted towards the northern end of the site in July 1987.

The land is not the subject of any nature conservation designation and is at a location that benefits from all mains services, including fast fibre broadband.

There are no physical or environmental constraints that would effect or in any way delay the development of the site.

Our only thought with regard to the site boundary is that there is a slight difference in the plan in the current consultation document from that in the Candidate Site Statement. The rear boundary at the north-western corner as shown in Candidate Site Statement is set very slightly further back so that it corresponds with rear boundary of the neighbouring residential property, number 54 Parklands Road. The relatively marginal difference is illustrated by the solid red triangular area in the plan below.

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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.

It is respectfully considered that the inclusion of the additional site would represent a logical continuation of the existing housing and help to sustain the existing community facilities.

Representation 31 - Arwel Evans (Lichfields)

Summary:

The respondent objects to the following sites; specific reasons are set out for each:

Representation 31(a) – Additional site PrC2/(iii) - Land at Pendderi Road, Bryn

The site is part of an existing allocation (GA2/h45) in the adopted Carmarthenshire LDP. 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. The Development Plans Manual makes it clear that –

"Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again."

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.

Representation 31(b) - Additional Site - PrC3/(i) - Emlyn Brickworks

We previously cited concerns regarding the deliverability of this site noting that it has been allocated in various historic development plans including the UDP and the Dinefwr Local Plan. Various planning permissions and variations have occurred over the years since the early 2000s. Despite this, only 9 dwellings have been completed on site. We understand that full planning permission (E29521) is in place since 2014 for the development of a further 70 dwellings but development has not been forthcoming, highlighting that there is a deliverability issue for this site.

The Council previously acknowledged the deliverability issues and said that "The site presents an opportunity to regenerate or redevelop a previously developed site. However, given that the site has been previously allocated with only a small portion of the previous allocation being developed, it is considered more realistic that a smaller area of the site is carried forward into the revised LDP which would be more manageable to develop. Further information will be sought as necessary from the landowner to demonstrate the site's deliverability and viability, particularly given the potential remediation costs."

At the time of the Deposit Plan consultation it was noted as a site that will deliver housing in year 10-15 of the Plan. It is unclear therefore why the Council has decided to increase the number of dwellings for this site, contradicting its previous comment about it being more realistic to carry over a smaller area of the site which would be more manageable to develop.

The Council notes that this allocation will increase from 177 to 227 dwellings. However, given that the site is only noted (in the Council's trajectory) to deliver 107 dwellings within the plan period, we question whether increasing the number of dwellings in this allocation will boost the available supply within the plan period as requested by the planning inspectors. It is also noted that the site promoter's statement anticipated approval of pre commencement planning conditions in relation to Phase 2 (north of the spur link road) by Q1 2025. However, these are yet to be

submitted. This suggests that the Council's trajectory is likely to be optimistic, even without considering the increase in numbers.

The Council's site assessment also notes that peat lies beneath the site. It must be acknowledged that PPW attributes considerable weight to its protection. The stepwise approach in PPW notes that proposals in areas of irreplaceable habitat (of which peatlands is one of them) are as a matter of principle unacceptable and should be excluded from site searches undertaken by developers. There are other more suitable sites which are less constrained available in Carmarthenshire such as Land at Talyclun, Llangennech, CA0881 / SR/086/075.

PPW (Para 4.2.18) states that for housing regeneration sites, where deliverability is considered an issue, planning authorities should consider excluding such sites from their housing supply so that achieving their development plan housing requirement is not dependent on their delivery. We don't consider that this site should be used as a component to meet the housing requirement. The site should be identified as a housing led regeneration site that does not form part of the supply to meet the housing requirement. Other deliverable sites should then be allocated to assist in meeting the Council's housing requirement.

Representation 31(c) - PrC3/(ix) - Breakers Yard, Gorslas

The Council's site assessment notes that the site's financial viability is subject to ongoing assessment. We query why the Council consider that the site is deliverable if the financial viability work is yet to be completed.

The site assessment also notes that 'notable ecological constraints' have been identified and the stepwise approach will need to be considered in accordance with PPW. Apart from the scrapyard site, the rest of the site appears to be covered in dense woodland.

We note that PAC has been undertaken but the PAC is silent on the number of dwellings to be applied for and therefore we query whether 80 units is achievable on this site, especially given the site's important ecological habitat which will need to be integrated into the layout in line with the stepwise approach. The number of units should be clarified.

Representation 31(d) - SeC7/(i) - Land at Pontarddulais Road, Llangennech

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).

Representation 31(e) - SeC6/(iii) - Land at Fforest Road

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.

Representation 31(f) - SeC3/(ii) - Land at Monksford Street, Kidwelly

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.

Representation 31(g) - SeC19/(i) - Land Adjacent to the Beeches, Whitland

Similar to the Kidwelly site, 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.

Representation 31(h) - Windfall Sites – Not Duly Made

In line with the development plans manual a large windfall rate should not be provided in the first 2 years of supply to avoid double counting. The Council should therefore reassess their windfall allowance taking this into account as well as the fact that an additional year of data will now be available. Previously, the Council had noted (in their hearing statement for session 2) that the windfall allowance had not been met in the first 6 years of the plan. This could potentially require the allocation of additional sites to account for the reduced windfalls now anticipated. In reality the windfall delivery rate should be lower once the plan is adopted given that sites will be allocated.

The Council should prepare a revised housing trajectory to understand the implications on the windfall figures.

For the reasons set out above we consider that the plan (including the additional sites) fails test of soundness 3 (will the plan deliver) and additional deliverable sites should be included such as Land at Talyclun, Llangennech, CA0881 / SR/086/075.

Representation 32 – Rhodri Thomas and Mark White, Transport & Digital Connectivity – Not Duly Made

Due to ongoing internal discussions we respectfully request a 14 day extension to the consultation period for the above stated consultation.

Please find our general comments below;

1. Transport solutions for new developments should focus on providing measures to maximise modal shift and minimise the need for any additional vehicular use of the highway network. The developer should define each measure and undertake an assessment of the percentage shift that each will generate. Once maximum modal shift has been achieved, the developer will be required to undertake an assessment of any residual increase in traffic. Should this assessment indicate that the development will still have a detrimental impact on the highway network, the developer will be required to identify measures and propose highway improvements sufficient to mitigate against the impact of the additional development-generated vehicles only. It's crucial to avoid large-scale highway improvements that could inadvertently encourage increased car usage and instead focus on sustainable transportation options.
2. Developments should utilise existing access onto the Trunk Road Network wherever possible as there is a presumption against new access. Access improvements may be required to accommodate any additional traffic movements generated by the development
3. Where new accesses are unavoidable, they must comply with standards of the Design Manual for Roads and Bridges. Should full standards be unachievable, this should be identified by the proposer/developer at the earliest stage and the transport proposals will be subject to review by a Welsh Government technical panel

4. Where a development is likely to increase traffic congestion and the development is not large enough to justify a significant junction improvement, the LA may seek combined contributions from developments within an LDP area in order to fund a full highway improvement scheme. There are also the wider implications of traffic generation that should be addressed and a strategy to reduce private motor vehicle trips while increasing sustainable mode share should be part of the wider transport package.
 5. Surface water from development sites shall be prevented from discharging onto the trunk road and shall not be connected into the trunk road drainage system.
 6. All new development proposals shall include due consideration of current Acts including the Active Travel Act, the Equalities Act as well as seek to meet objectives of the Wales Transport Strategy.
 7. No development site should seek to amend any aspect of the trunk road asset without consultation and agreement. Construction / clearance work should not affect the stability of any trunk road embankment or alter the soft estate/boundary.
 8. Noise mitigation measures should be considered in areas adjacent to the trunk road where existing traffic noise may be considered an issue and sites should be self-contained with any such structures measures within the confines of private land.
-

Representation 33 - Melanie Lindsley, The Coal Authority – Not Duly Made

Thank you for your notification of the 27th March 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the Carmarthenshire Council area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.

As you will be aware we provide the LPA with data in respect of Development Risk plans, these are available by both GIS downloads and a WFS link. We issue refreshed data annually and this was last done on the 8th April 2025. We note that this refreshed data has not been downloaded by the LPA. It is requested that you download this updated data as soon as possible in order to ensure the decisions are being made on the most up to date information available. Any problems downloading this data, or if you require a WFS link, please let me know.

In respect of the additional sites, the subject of this consultation, we would expect them to be assessed against the data we provide to the LPA in order that it can be determined if there are coal mining legacy features which may pose a constraint and impact on the quantum of development that can be accommodated on a site. This is especially the case when recorded mine entries are present on a site. The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

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<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

It is important that any issues arising from past coal mining legacy are identified at as early a stage in the site allocation process as possible.

Representation 34 – Jason Evans, Evans banks Planning

Summary (see attachments)

Formal objection to PrC2-ii-Land adjacent to Cefncaeau, Llanelli.

Further to the publication of a series of Additional Allocations by the Council as part of the preparation of its Replacement Local Development Plan (RLDP), we have been instructed by our Clients to review the relevant publications of the Council and make formal submissions in relation to any aspects we believe would result in the document being 'unsound'. This therefore represents one of a number of objections we are making on behalf of our Clients to Additional Allocations being put forward by the Council, as their inclusion would result in the RLDP failing the relevant Tests of Soundness

Representation 35 - Jason Evans, Evans Banks Planning

Summary (see attachments)

Formal objection to PrC3-ii Land adjacent to Pant y Blodau.

This objection relates to Additional Allocation PrC3/(ii) – *Land Adjacent to Pant-y-Blodau, Penygroes*. It should be noted that an objection has also been made to the adjoining allocation (RLDP reference PrC3/h22) and so previously made submissions made in relation to that site should be read in conjunction with those presented herein.

From a deliverability perspective, it is unclear as to why the Council are proposing the inclusion of the Additional Allocation in question for the purposes of residential development in its RLDP, when there are such significant concerns regarding the very same issue in relation to the adjoining and associated proposed allocation. The adjoining proposed allocation has had the benefit of planning permission for over 10 years, and we understand, been supported by development plan policy for the purposes of residential development for longer. Despite this, the site has failed to be delivered to date.

In view of the above, it is surprising that the Council are now proposing to allocate the adjoining land for an additional 11 units. It is inconceivable to argue that the 11 units are required to make the delivery of the adjoining 79 viable and with such a clear lack of delivery, we would argue it is unsound to expect a further 11 units from the Additional Allocation to be delivered within the Replacement Plan period. With such significant questions over the delivery of the 79 units, it would be therefore unsound on delivery grounds to expect the delivery of the additional 11 proposed for the Additional Allocation within the Plan period.

In addition to the above and for the reasons extensively explored at the Examination in Public, we have significant concerns with regards to the biodiversity value of the site and its impact on the physical delivery of the site. Based on recent decisions made by the Council on the advice of the County Ecologist, it is quite clear that the presence of Marshy Grassland on the site will prevent the delivery of any new units on the Additional Allocation within the Plan period. To go against this well established precedent would in the view of the Council itself, go against the advice and

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requirements of Chapter 6 of *Planning Policy Wales*. Such a conflict with national planning policy would therefore result in the Plan – if it were to include the Additional Allocation – being unsound.

Representation 36 - Gareth Barton, Turley on behalf of Tata Steel

Summary:

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 below key points regarding the site's status, deliverability and planning permission.

The covering letter supports the promotion of the additional site.

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.

Representation 38 - Kate Harrison, Persimmon Homes – Not Duly Made

Persimmon Homes West Wales are actively promoting the following candidate site for residential allocation in the Deposit Plan, of which an Option Agreement is in place (Promotional documents were submitted as part of the candidate site submission

The existing consultation follows the preliminary findings from the Examination in regard to the flexibility in the housing supply and the inspectors request to increase this from 2.5% to at least 10% to ensure there is sufficient provision to meet the housing need. It is understood that the Council have identified potential additional land for housing in the County Council Area. It is noted that not all additional sites published as part of this consultation will necessarily be allocated

Representation 39 - National Grid Electricity Transmission (NGET) – Not Duly Made

National Grid Electricity Transmission provide general advice and guidance to the Council and identify through a link to their website the location and details of NGET assets within the area.

Representation 40 - Boyer Planning

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.
- Outlines issues with other sites and potential implications on the Council's housing supply along with the overall deliverability of the plan.

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Representation 40(a) - PrC1/(iv) – Land off Trevaughan Road, Carmarthen

Although BDWH appreciate this site is considered to represent a proportionate extension to the defined urban area of Carmarthen. According to the Council's latest assessment we understand approximately 60% of the site is identified as Grade 3a (Good) Quality Agricultural Land. In accordance with national policy this falls within the definition of Best and Most Versatile (BMV) land and in turn we query the sites suitability to accommodate future development given the quality of agricultural land that would subsequently be lost.

Representation 40(b) - SeC6/(ii) – Fforest Garage, Fforest

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.

Collectively these factors further justify the proposed allocation of Heol y Mynydd in its entirety. This would naturally complement the other proposed site allocations identified within the Additional Sites Consultation document. Whilst bolstering the Council's position in terms of demonstrating the requisite level of housing us able to be delivered in a timely manner over the proposed plan period up to 2033

Representation 40(c) - SeC7/(i) - Land at Pontarddulais Road, Llangennech

BDHW do not necessarily oppose the overall principle of allocating this site for future development, however according to the Council's Additional Sites Evidence Base document, we understand there is some uncertainty regarding a small section of third-party land. This land is located immediately adjacent to Pontarddulais Road that could potentially affect a developer's ability to gain access into the site. Whilst we presume this has been subject to further investigation to warrant its inclusion as a potential site allocation, having reviewed the supporting evidence base we are not aware of any further information on this matter. 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, although we appreciate the Council have undertaken further work as part of their due diligence exercise. According to Appendix G of the Additional Sites Evidence Base document it is evident that the Council's highways department still have some reservations regarding the potential impact development in this location could have in exacerbating existing capacity issues along Pontarddulais Road, the Talyclun Traffic Signals and the A4138 through to M4 Junction 48. Whilst we note the Highways Team explain that any future application will need to be supported by a comprehensive Transport Assessment (TA) to fully consider such matters. In the interests of soundness it is important these factors are given due regard within the actual plan-making process to provide sufficient comfort that these circumstances will not prevent future housing from coming forward in order to meet local need.

Representation 40(d) - PrC3/(ii) – Adjacent to Pant-y-Blodau, Penygroes;

Whilst BDWH do not contend the overall principle of allocating the following site PrC3/(ii) – Adjacent to Pant-y-Blodau, Penygroes it is noted that it is relatively small in nature.

As mentioned above, although we note that the site will make some form of contribution toward CCC's housing numbers. From experience given that it is spatially constrained 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. When considered across multiple sites this has the potential to have a detrimental impact on the Council's overall supply of housing therefore it is imperative these are supplemented by comparatively larger allocations

Representation 40(e) - PrC3/(iv) – Land adjoining Maes Ifan, Maesquarre Road

Whilst BDWH do not contend the overall principle of allocating the following site PrC3/(iv) – Land adjoining Maes Ifan, Maesquarre Road it is noted that it is relatively small in nature.

As mentioned above, although we note that the site will make some form of contribution toward CCC's housing numbers. From experience given that it is spatially constrained 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. When considered across multiple sites this has the potential to have a detrimental impact on the Council's overall supply of housing therefore it is imperative these are supplemented by comparatively larger allocations

Representation 40(f) - PrC3/(v) - Land off Parklands Road, Ammanford)

Whilst BDWH do not contend the overall principle of allocating the following site PrC3/(v) – Land off Parklands, Ammanford it is noted that it is relatively small in nature.

As mentioned above, although we note that the site will make some form of contribution toward CCC's housing numbers. From experience given that it is spatially constrained 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. When considered across multiple sites this has the potential to have a detrimental impact on the Council's overall supply of housing therefore it is imperative these are supplemented by comparatively larger allocations

Representation 40(g) - SuV37(i) – Former Coedmor School, Cwmann

Whilst we appreciate that these sites technically benefit from planning permission and are therefore recognised as potential commitments within the Council's Additional Sites Consultation document. The concerns raised in our previous Deposit Plan Representations remain in that both these sites are located within Phosphate Sensitive Areas and therefore reliant on external infrastructure improvements to ensure sufficient mitigation is in place before they can be brought into use.

Although we note that the respective decision notices contain Grampian conditions which formally prevents occupation of the permitted residential dwellings until 31st March 2025, or until the successful installation and operation of phosphorus removal plant at the relevant Waste Water Treatment Works (WWTW). Any potential delays to the latter will have a detrimental impact on the emerging RLDP's housing trajectory particularly given the Council are currently relying on both sites to be fully constructed over the 2025/26 & 2026/27 periods.

Representation 40(h) - SeC15(i) – Land at Cilycwm Road, Llandovery

Whilst we appreciate that these sites technically benefit from planning permission and are therefore recognised as potential commitments within the Council's Additional Sites Consultation document. The concerns raised in our previous Deposit Plan Representations remain in that both these sites are located within Phosphate Sensitive Areas and therefore reliant on external infrastructure improvements to ensure sufficient mitigation is in place before they can be brought into use.

Although we note that the respective decision notices contain Grampian conditions which formally prevents occupation of the permitted residential dwellings until 31st March 2025, or until the successful installation and operation of phosphorus removal plant at the relevant Waste Water Treatment Works (WWTW). Any potential delays to the latter will have a detrimental impact on the emerging RLDP's housing trajectory particularly given the Council are currently relying on both sites to be fully constructed over the 2025/26 & 2026/27 periods.

Representation 41 – Richard Banks, Evans Banks Planning

Formal objection to SeC6-ii-Fforest Garage, Hendy – see attached document

The respondent objects to the re-allocation of the site at Fforest garage, citing significant issues relating to contamination, remediation costs, the lack of previous delivery and the viability of bringing the site forward

We would request on behalf of our clients, for the proposed Additional Allocation to be omitted, and the site at Fforest Garage merely allowed to remain within defined settlement limits as presented in the Unitary Development Plan and Second Deposit of the Replacement Local Development Plan.

Representation 42 - Louise Edwards, Natural Resources Wales

NRW provide an overarching response and provide comments on each additional site proposed. Please refer to the main report and the original representation for additional detail.

Representation 43 - R, H & D Jones PrC2/(ii)

Linked to site PrC2/(ii)

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.

Representation 44 – R, H & D Jones SeC6/(iii)

Linked to site SeC6/(iii)

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.

Representation 45 – R, H & D Jones Sec7/(i)

Linked to site SeC7(i)

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.

Representation 46 – R, H & D Jones PrC3/(vii)

Linked to site PrC3/(vii)

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.

Representation 47 – R, H & D Jones SuV25(i)

Linked to site SuV25/(i)

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.

Representation 48 - Jason Evans, Evans Banks Planning

Summary (see attachments)

Formal objection to PrC3-ix Breakers Yard, Gorslas. 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

Representation 49 – Trimsaran Rugby Club – Not Duly Made

The respondent seeks the inclusion of land within their ownership and asks the Council to reconsider the development potential of the site referenced by candidate site number SR/157/004.

Representation 50 – Dewi Griffiths (Dŵr Cymru Welsh Water)

Dŵr Cymru Welsh Water provide an overarching response and provide comments on each additional site proposed. Please refer to the main report and the original representation for additional detail.