

**Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin 2018 - 2033**  
Carmarthenshire Revised Local Development Plan 2018 - 2033

**Ffurflen Sylwadau 2il Cynllun Datblygu Lleol Diwygiedig Adneuo**  
2nd Deposit Revised LDP Representation Form

*Hoffem gael eich barn am yr 2il Cynllun Datblygu Lleol Diwygiedig Adneuo (Cynllun Datblygu Lleol) ac ar ddogfennau sy'n cefnogi'r Cynllun Datblygu Lleol.*

*Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. sylwadau neu wrthwynebiadau) Mae fersiynau nodiadau cyfarwyddyd ar gael o [www.sirgar.llyw.cymru](http://www.sirgar.llyw.cymru). Os ydych yn cyflwyno copi papur, atodwch dudalennau ychwanegol lle bod angen.*

*Bydd angen i unrhyw sylwadau a wnaed i'r CDLI Adneuo 1af gael eu hailgyflwyno fel rhan o'r ymgynghoriad ar yr 2il Adnau CDLI. Dim ond sylwadau a wnaed yn briodol i'r 2il CDLI Diwygiedig Adneuo fydd yn cael eu cyflwyno yn yr Arholiad. Ni fydd sylwadau a wnaed i'r CDLI Adneuo 1af bellach yn cael eu hystyried ac ni fydd yn rhan o'r Arholiad.*

*Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Yr Arolygiaeth Gynllunio.*

**Mae'n rhaid derbyn eich sylwadau erbyn 4:30pm ar y 14 o Ebrill 2023.**

*Dychwelwch ffurflenni at:*

*Rheolwr Blaen-gynllunio, Lle a Chynaliadwyedd, Adran Lle a Seilwaith, 3 Heol Spilman, Caerfyrddin, SA31 1LE*

We would like your views on the Revised Carmarthenshire Local Development Plan (LDP) 2nd Deposit, and also on documents which support the LDP.

This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at [www.carmarthenshire.gov.wales](http://www.carmarthenshire.gov.wales). If you are submitting a paper copy, attach additional sheets as necessary.

Any representations made to the 1<sup>st</sup> Deposit LDP will need to be resubmitted as part of the consultation on the 2<sup>nd</sup> Deposit LDP. Only duly made representations to the 2<sup>nd</sup> Deposit Revised LDP will be submitted for examination. Representations made to the 1<sup>st</sup> Deposit LDP will no longer be considered and will **not** form part of the Examination.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

**Your representations must be received by 4:30pm on the 14th April 2023.**

Please return forms to:

Forward Planning Manager, Place and Sustainability, Department of Sustainability and Infrastructure, 3 Spilman Street, Carmarthen, SA31 1LE.

**RHAN A: Manylion cysylltu****PART A: Contact details****Eich manylion/manylion eich cleient**  
**Your details / your client's details****Manylion yr asiant (os ydynt yn berthnasol)**  
**Agent's details (if relevant)***Enw*  
Name

RSAI

Mr Arwel Evans

*Teitl swydd (lle y bo'n berthnasol)*  
Job title (where relevant)

Associate Director

*Sefydliad (lle y bo'n berthnasol)*  
Organisation (where relevant)

Lichfields

*Cyfeiriad*  
Address

c/o agent

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]*Rhif ffôn*  
Telephone no

c/o agent

[REDACTED]

*E-bost*  
Email address

c/o agent

[REDACTED]

*Llofnodwyd*  
Signed

[REDACTED]

*Dyddiad*  
Date

12/04/23

**RHAN B: Eich sylw****PART B: Your representation***Eich enw / sefydliad*  
Your name / organisation

RSAI

**1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?****1. Which part(s) of the Plan (or supporting documents) are you commenting on?***Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle*  
LDP policy or site allocation number(s)HOM1 (Housing Allocations)  
SP16 (Sustainable Distribution - Settlement Framework)

	<p>SP3 (A Sustainable Approach to Providing New Homes)</p> <p>SP1 - Strategic Growth</p> <p>SG1 - Regeneration and Mixed Use Sites</p> <p>SG2 - Reserve Sites</p> <p>SP5 - Strategic Sites</p> <p>PrC3/h14</p> <p>PrC3/h18</p> <p>PrC3/h8</p> <p>PrC3/MU1</p> <p>SeC4/MU1</p> <p>SeC4/h2</p> <p>PrC3/h18</p> <p>PrC3/h28</p> <p>SeC11/h1</p> <p>SG2/4</p>
<p><i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i></p> <p>LDP paragraph or section number(s)</p>	<p>9.1 to 9.15 (A New Spatial Approach)</p>
<p><i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i></p> <p>LDP Proposals Map reference(s)</p>	<p>PrC3/h14</p> <p>PrC3/h18</p> <p>PrC3/h8</p> <p>PrC3/MU1</p> <p>SeC4/MU1</p> <p>SeC4/h2</p> <p>PrC3/h18</p> <p>PrC3/h28</p> <p>SeC11/h1</p> <p>SG2/4</p>
<p><i>Os yw eich sylw yn perthyn i ddogfen ategol (e.e. y Gwerthusiad o Gynaliadwyedd), rhowch yr enw(au) a'r cyfeiriad(au) i mewn yma.</i></p> <p>If your representation relates to a supporting document' including the:</p>	<p>n/a</p>

Sustainability Appraisal), and/or Habitat Regulations Assessment insert the name of the document and section reference(s) and/or paragraph number here.	
<p><b>2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol.</b></p> <p><i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i></p> <p><b>2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.</b></p> <p><i>For more information on soundness and procedural requirements, see the guidance notes.</i></p>	
<p><i>Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.</i></p> <p>I think the LDP is sound and meets procedural requirements.</p>	
<p><i>Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.</i></p> <p>I think the LDP is unsound and should be changed.</p>	X
<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i></p> <p>I think that the procedural requirements have not been met.</p>	
<p><b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b></p> <p><i>Ticiwch <u>bob un</u> sy'n berthnasol.</i></p> <p><b>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</b></p> <p>Tick <u>all</u> that apply.</p>	
<p><i>Dyraniad safle newydd</i></p> <p>New site allocation</p>	X
<p><i>Polisi newydd</i></p> <p>New policy</p>	
<p><i>Paragraff neu destun ategol newydd</i></p> <p>New paragraph or supporting text</p>	
<p><b>4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel safle cais? Os felly, a fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).</b></p>	



**4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).**

<i>Enw'r safle</i> Site name	Land at Talyclun, Llangennech
<i>Cyfeiriad y cais</i> Site reference	CA0881 / SR/086/075

*Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.*

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

**5. Rhestrwch eich sylwadau isod.**

*Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/profion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.*

**5. Please set out your comments below.**

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note

that the Inspector will not have access to comments you may have made in response to previous consultations.

**HOM1 (Housing Allocations) / SP16 (Sustainable Distribution - Settlement Framework) / SP3 (A Sustainable Approach to Providing New Homes)**

We have reviewed the housing allocations proposed in the Deposit LDP and note that only 94 dwellings are proposed in Llangennech. Llangennech is a Tier 2 (Service Centre) which is the second highest tier within the settlement framework. Llangennech lies within Cluster 2 (Llanelli Area) and within Cluster 2 it is the settlement that is proposed to accommodate the least amount of residential development. We note that Burry Port (another Service Centre in the same cluster) has been allocated 501 dwellings, over five times the amount allocated to Llangennech whilst Trimsaran/Caraway (also a Service Centre in the same cluster) has been allocated 345 dwellings. We consider that the distribution of development within Cluster 2 should be more balanced and proportionate to ensure that the plan is effective (test of soundness 3).

Llangennech is a highly sustainable settlement, as reflected in its identification as a Service Centre Settlement in the deposit LDP. Paragraph 10.10 of the Deposit LDP states:

*“Llanelli remains the focus for delivery within this area, along with villages within its urban outskirts. The service centres which fall within this cluster are key components in the delivery of new homes and jobs given their overarching relationship to the rest of the cluster. This cluster has the highest population density within the county.”*

The settlement of Llangennech benefits from numerous facilities and services including Ysgol Gymraeg Llangennech (a Welsh medium primary school with an infant and junior school), a GP surgery, nursery, convenience store, post office, pharmacy and formal sports provision. The settlement is well served by public transport in the form of a railway station and bus stops. The settlement also benefits from an established employment area providing valuable job opportunities.

The settlement is within easy reach of junction 48 of the M4 meaning that development in Llangennech is unlikely to have as much impact on the A4138 as development in Llanelli and all the other Cluster 2 settlements with the exception of Hendy/Fforest. This is because traffic coming off the M4 to Llanelli, Burry Port, Kidwelly, Pembrey and Trimsaran/Caraway will all need to travel on the A4138 and through Llanelli. Allocating significant development in the Service Centres beyond Llanelli is likely to lead to traffic implications as the infrastructure serving these centres all run through the town of Llanelli. Locating additional residential allocations in Llangennech as opposed to the settlements west of Llanelli will assist in delivering the housing requirement, in line with the settlement hierarchy, in a more proportionate manner which will, as a result assist in reducing the amount of traffic running through Llanelli.

#### **INF4 (Llanelli Wastewater Treatment Works Catchment Surface Water Removal)**

We also note that development in Llanelli and Burry Port will need to be subject to draft Policy INF4 and the Burry Inlet SPG as the sites drain into the Llanelli Waste Water Treatment Works. According to the LDP, within this catchment area there are concerns that the connection of foul flows generated by new development introduces the risk of deterioration in the water quality of the Carmarthen Bay and Estuaries European Marine Site (CBEEMS). This is due to the fact that the majority of the sewer system in the Llanelli WWTW area is combined (surface and foul). DCWW has requested that all new development within the catchment be subject to a requirement to undertake compensatory surface water removal from the system as part of the granting of planning permission. The LDP (11.204) states that:

*"there is a concern that introducing additional foul flow can lead to overloading to the WWTW, as well as an increase in the frequency of discharges from storm sewerage outflows out to the CBEEMS during significant rainfall. There can also be potential localised flooding issues resulting from these issues."*

Given the above concern and necessary compensation requirements we question the logic of directing so much development to the affected area when suitable alternatives are available in the cluster. The settlement of Llangennech lies outside of the catchment in question and therefore we argue that it would be appropriate to reduce the quantum of development in the Burry Inlet area and to provide some of the redistributed quantum of development in the nearby settlement of Llangennech, therefore retaining the quantum of development in Cluster 2.

As previously explained, only 94 dwellings are proposed to be developed in Llangennech during the lifetime of the plan. All of the 94 dwellings are expected to come forward within the 6-10 years timeframe with none expected to come forward within the 0-5 years timeframe. We consider that additional allocations should therefore be made in Llangennech to ensure that a suitable supply of housing is able to come forward in the short term to meet local needs. We consider that our client's site is well placed to meet this short term need because heads of terms has been agreed with Persimmon Homes, a national house builder to bring the site forward in the short term if the site is allocated. It is widely acknowledged that, if allocated, that the site would be capable of early delivery. The Council in its assessment form states:

*"Given the site's size, greenfield status and location close to the M4, it is likely to have a market appeal."*

In addition, Persimmon Homes has provided a Statement which is appended to this submission. The statement states:

*"The viability of the site has been assessed by Persimmon Homes West Wales utilising external and abnormal rates from a comparable site (in terms of size and topography) currently under construction in our West Wales Region.*

*Persimmon Homes West Wales expects to continue its track record of delivering housing sites in the Region at a rate in excess of 50 dwellings per year and at 'policy level'. That is, we consider this site to be deliverable with an on-site provision of Affordable Housing at a rate of 20% together with Education, Open*

*Space, Transportation contributions in line with those on comparable sites currently under construction in Carmarthenshire.*

*It should also be noted that following this assessment of the viability of the site, Persimmon Homes West Wales concluded that it was appropriate to agree the Heads of Terms for the sale of the land with the landowner. I trust that this serves to demonstrate our commitment to developing this site and that it is technically deliverable in line with the Council's housing delivery aspirations."*

Including our client's site would assist in ensuring that Llangennech remains a vibrant and viable settlement. Additional housing in this area in the short term will assist in supporting the local primary school in Llangennech. There is a risk that in delaying the vast majority of development until 2025-2030 that the settlement and its services and facilities will become stagnant. A critical mass of population is required in the short term to ensure the vibrancy of the town's facilities and services.

As explained in our candidate site submission (documents attached again for the Inspector's benefit) we consider that our client's site is suitable for development. It is immediately adjacent to the settlement boundary (to the south and east) and within close proximity to the primary school and other facilities such as play areas, playing fields and bus stops. There are very limited physical and environmental constraints and there is no flooding issue - the Council's SFCA confirms that the site is in the best category in terms of flooding as it has a Risk Category of Low.

Importantly some of the Council's proposed allocations are at a Medium and High risk of flooding according to the SFCA (February 2023) prepared by JBA. This includes Nantydderwen (PrC3/h14 33 units), land adjacent Brynlluan (PrC3/h18 29 units) and land off Heol y Parc (PrC3/h8 18 units).

We consider this to be a concern given the recent flooding in South Wales and the Welsh Government's aspiration of ensuring resilient developments (Well Being Goal as set out in the Well-being of Future Generations Act) that are not at risk of flooding. The consultation document on TAN15 seeks to direct development to Zone 1 (very low risk) and only to Zone 2 (low risk) if the development meets strict tests. We consider that suitable sites that are of the very lowest flood risk should be allocated ahead of others that have a higher flood risk. Our client's site (SR/086/075) should be looked at positively in this regard.

We have demonstrated that the site is viable given the developer interest, meaning that there is certainty that the site can be delivered. We query whether the proposed allocations benefit from the same certainty in terms of delivery.

We consider that as currently drafted the plan is not sound. We consider that the plan fails test of soundness 2 (is the plan appropriate) and test of soundness 3 (will the plan deliver). We set this out below:

**Test of Soundness 2** - Based on the above, we do not consider that the Plan is logical, reasonable and balanced. The distribution of development across Cluster 2 is unsuitable and the sustainable and desirable settlement of Llangennech has been overlooked as a settlement to accommodate a fair and reasonable amount of residential development. We do not consider that the candidate sites put forward in Llangennech (including SR/086/075) have been considered as a fair alternative to



the current sites proposed for allocation in the LDP. The Council notes in its candidate site assessment for SR/086/075 that the scale of allocations in Llangennech is appropriate in terms of meeting the identified growth requirement for the settlement but has not provided evidence to substantiate this claim. In addition, the Council states that the identified growth requirement (94 dwellings) is reflective of its role and function within Cluster 2 as a whole. We disagree with this statement. No evidence has been put forward to explain why Llangennech has been apportioned the least amount of growth amongst the cluster 2 Service Settlements. There is no logic or consistency to this disproportionate approach given that Llangennech is a highly sustainable settlement with ample services and facilities.

The site assessment for SR/086/075 concludes that:

*“ Development would lead to an unnecessary encroachment beyond the development limits. The site is spatially detached from Llangennech and allocating for housing at this location is considered illogical. The site will remain outside of development limits”*

We disagree with this statement as the site is adjacent to the settlement boundary of Llangennech and not spatially detached? There is no logic in the LPA's assessment of this site. Any greenfield site, will by its very definition be beyond the development limits.

**Test of Soundness 3** - Based on the above, we do not consider that the plan will deliver, especially in the short term. A specific example is that only a very limited number of dwellings (67) are to come forward in the settlement of Llangennech in the short term (as defined by Carmarthenshire Council) first 8 years of the plan (average of 7.5 per year). This is not an effective way of delivering growth and planning gain to this area. Within Cluster 2, this is a very small proportion of growth. This is a noticeable void which would be detrimental to the health of the settlement.

We also query whether the sites allocated will be capable of meeting the revised TAN15 policy when it is published given that some of the sites are located in areas of potential flooding. If the sites are not able to meet TAN15 policy then they will not be deliverable. This will render the LDP undeliverable.

### **HOM1 (Housing Allocations) / SP6 Strategic Sites / SG2 Reserve Sites / SG1: Regeneration and Mixed Use Sites**

In addition to the points that we have raised about the strategy and spatial distribution of development we also wish to make comments about the suitability, viability and deliverability of the housing allocations that have been proposed. This is in the context of our consideration of the fact that site SR/086/075 is a suitable and deliverable site with limited technical or environmental constraints. We have attached our comprehensive candidate site submission as well as a recent statement from Persimmon Homes confirming their continued interest in the site and that they consider the site to be deliverable in the short term.

### **Foul Water (Llanelli WWTW)**

The issue of foul water being treated at Llanelli WWTW is widely acknowledged and we have referenced this in our response above. We consider this to be an impediment to the delivery of the large number of dwellings located in this catchment area. Whilst there may be a solution to each respective site, the issue is likely to cause a delay to the delivery of these sites and the added burden of the compensatory matters (in kind works or financial contribution) may have a consequential impact upon viability, meaning that affordable housing and other planning obligations cannot be delivered as the plan has envisaged. Has the mitigation been included in the Local Plan Viability Assessment? Have the impacted sites explained how they will overcome the issue in relation to their site?

### **Rolled Forward Allocations and General Lack of Information About Viability/Deliverability**

Planning Policy Wales (Edition 11 states) emphasises the importance of deliverable sites. It states that as part of demonstrating the deliverability of housing sites, financial viability must be assessed prior to their inclusion as allocations in a development plan. At the 'Candidate Site' stage of development plan preparation land owners/developers must carry out an initial site viability assessment and provide evidence to demonstrate the financial deliverability of their sites. For sites that are key to the delivery of the plan, a more detailed viability appraisal is required.

We are concerned about sites that have been allocated in previous development plans that have not been developed being allocated again without sufficient justification/evidence that they will be delivered this time around. We consider that these sites should not be included again unless robust evidence is presented. We are also concerned that candidate sites have been allocated without any real information being provided about their viability/deliverability. For our client's site we have provided regular updates to the Council regarding the firm developer interest in developing the site in the short term and an update in the form of a Statement from Persimmon Homes that is attached with our deposit representations. We are concerned that a number of sites have been allocated without a developer that is lined up to build out the site, especially those that are to contribute to the development trajectory in the first 5 years. In reviewing the Council's assessment of sites we are concerned with the lack of certainty about deliverability.

We set out a few examples below:

**Emlyn Brickworks, Penygroes (177 dwellings)(PrC3/MU1)** - This site was allocated in the previous LDP for 250 dwellings. It was also allocated in some form in the previous UDP and before then 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 LPA's candidate site assessment for this site acknowledges that there is an issue but continues to propose allocation of the site:

*"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."*

It is currently identified as a site that will deliver housing in year 10-15 of the Plan. This further highlights the uncertainty regarding the delivery of this site.

We consider that credible information about the deliverability and viability of the site should be presented now before committing to allocating the site again. If the site cannot demonstrate that it can be delivered then the LPA should identify other sites that can provide the necessary evidence. 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 either be removed from the LDP or identified as a housing led regeneration site that does not form part of the supply to meet the housing requirement.

We are also concerned that Policy HOM1 does not differentiate between completions, sites with planning permission, sites under construction and new allocations. This should be clarified in the final version of the LDP.

**Burry Port Waterfront (364 dwellings) (SeC4/MU1 and SeC4/h2)** - The initial outline application for this site was submitted in 2008 and outline permission was subsequently granted on 27 January 2016. However, to this date no development has come to fruition. We are aware that an extension of time was issued in December 2019 in order to extend the timescale for submission of reserved matters. However, prior to any development commencing a number of pre commencement conditions require discharging and reserved matters approval will be required. We are not aware that a developer is on board. This raises real questions about the delivery of the scheme. As a housing led regeneration site we consider that if the LPA wish to continue allocating this site then it should not be relied upon in the Council's housing land supply due to the uncertainty about delivery. As explained above, we are also concerned about the SFCA's classification of the site as an amber flood risk where JBA (the Council's flood advisors) note that they have 'concerns for the allocation'.

**Brynluan, Gorslas (29 dwellings) (PrC3/h18)** - The site has been identified to deliver housing in the 10 to 15 year timeframe. We question why so much time is required to deliver a fairly small scheme. The Council's Candidate Site Assessment states *that "Additional information will be sought as necessary as the LDP progresses towards examination to identify when the site is likely to be brought forward."* We assert that information about the deliverability of the site should be presented now to understand why the long timescale is required, otherwise sites that have provided this information should be prioritised.

**Land at factory site between no. 22 & 28 Bethesda Road (30 dwellings) (PrC3/h28)** - The Council's Candidate Site Assessment states that *"the site is subject to planning permission, however, further information will be sought as*

*necessary as the LDP progresses towards examination to identify when the site is likely to be brought forward".* If the site benefits from planning permission then we question why the site is not being brought forward. Is there an issue to the deliverability of the site? The initial outline planning permission was granted in 2013 and no reserved matters applications have been forthcoming. We suggest that if credible evidence is not presented to demonstrate deliverability then the site should not be reallocated. Evidence has not been provided to demonstrate that a developer will build the site.

**Land off Heol Llannon, 15 dwellings (SeC11/h1)** - The Council's Candidate Site Assessment states that *"Additional information will be sought as necessary as the LDP progresses towards examination to evidence the site's financial viability and to identify when the site is likely to be brought forward."* The site has not passed question C26 (Deliverable and Financially Viable). We therefore question how the Council can propose that the site is allocated when insufficient evidence has been provided in relation to its deliverability. The site is noted as being delivered in year 10-15 and we question why such a small site would take this long to be delivered.

We have set out a number of examples above where we consider that insufficient evidence has been provided to demonstrate the deliverability of the site. This totals 615 dwellings. However, we have only cited a few examples. On the whole, we are generally concerned that the LPA has allocated sites without the robust evidence that is required by PPW and the Development Plan Manual to demonstrate that the sites are deliverable from a technical and financial perspective. This includes a number of Council owned sites. The Council should be transparent about the timetable for delivery of its own sites.

We note the Welsh Government's research into stalled sites prepared by Arcadis. One of the recommendations of the report is for LDPs to identify sites which are deliverable. This requires LDPs to provide evidence of deliverability, viability and to set a trajectory for development. We do not consider that the LDP as drafted currently has gone far enough in demonstrating the deliverability of sites. If the LDP is progressed in its current form then we consider that stalled sites will continue to be evidenced. The Report explained that Carmarthenshire had the highest number of stalled sites (approximately 70) out of all of the Welsh LPAs. The LPA should seek to adopt an LDP which does not risk further stalled sites.

As a result of this analysis we consider that the Deposit Plan fails Test of Soundness 3 (Will the Plan Deliver). Not delivering enough housing will have significant consequential impacts on the Council's ability to attract new jobs to the area as the LDP aspires to do. Other sites put forward as part of the LDP process have better prospects of being delivered and written evidence has been provided of this. This includes our client's site (SR/086/075) which continues to have firm developer interest in the form of national housebuilder Persimmon Homes.

**Policy SG2: Reserve Sites**

It is unclear where the reserve sites are located because they are not identified on the draft proposals map. It is also unclear what form of development will come forward as part of these sites and therefore we question whether the policy is sound. We question whether the policies will deliver (test of soundness 3).

We also question the fact that only two sites are to include residential uses and one of these SG2/4 (Former Ennis Caravans, Cross Hands) has doubts over its delivery prospects.

We have serious reservations about the deliverability of these sites and whether the policy will be effective? We cannot see that a site assessment has been carried out for these sites including evidence on financial viability. Reserve sites need to be deliverable in order for the LDP to be adaptive and effective.

**Policy SG1: Regeneration and Mixed Use Sites**

The Welsh Government's LDP Manual makes it clear that LPA's should

*“consider the reality of the land bank to be delivered. Sites unlikely to be delivered should be de-allocated and not ‘rolled forward’ from the previous plan. It could be prudent to identify such sites separately as regeneration sites which do not count towards the housing requirement.”*

It is unclear to us why regeneration sites such as Emlyn Brickworks (PrC3/MU1) forms part of the housing supply under HOM1 as it is clear that there has been deliverability issues for a prolonged period of time. The Regeneration sites identified under Policy SG1 should be separate to the land supply and should be treated as ‘bonus sites’. Emlyn Brickworks has been allocated in various plans over the years and failed to deliver. The LDP Manual states, in terms of rolling over allocations:

*“If an LPA wishes to retain such sites but cannot evidence they will be delivered, i.e. for aspirational or regeneration purposes, they can still be allocated in the plan but not relied upon as contributing to the provision. It will not be appropriate to include such sites in the windfall allowance. They should be treated as ‘bonus sites’.”*

The fact that the SG1 sites are included in the housing supply is a concern and we consider it fails the test of soundness 3 (will the plan deliver). There are better sites available to the Council that are deliverable and will ensure that the housing requirement can be delivered.

*Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.*

Tick here if you are submitting additional material to support your representation.

X



**6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?**

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer hefyd y bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol ar gyfer darparu ar gyfer y rhain sydd eisiau rhoi tystiolaeth lafar.

**6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?**

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

*Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.*

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

*Rwyf am siarad mewn sesiwn gwrandawriad.*

I want to speak at a public hearing.

Yes

*Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').*

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

Alternative Sites (SR/086/075)

HOM1 (Housing Allocations)

SP16 (Sustainable Distribution - Settlement Framework)

SP3 (A Sustainable Approach to Providing New Homes)

Development Viability

SP1 - Strategic Growth

SG1 - Regeneration and Mixed Use Sites

SG2 - Reserve Sites

SP5 - Strategic Sites

9.1 to 9.15 (A New Spatial Approach)

**7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.**

**7. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.**

*Rwy'n dymuno cael fy nghlywed yn Gymraeg.*

I wish to be heard in Welsh.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

Yes

## Nodiadau cyfarwyddyd

### Guidance notes

*Caiff Cynllun Datblygu Lleol Sir Gaerfyrddin ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.*

*'Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:*

- 1. Ydy'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)*
- 2. Ydy'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)*
- 3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)*

*Darperir rhagor o wybodaeth am y profion cadernid a gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.*

*Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.*

*Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.*

*Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu*

The Carmarthenshire Revised Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the

*hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.*

*Os ydych yn ceisio am fwy nag un newid i'r Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.*

*Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid nodi cynrychiolydd y grŵp (neu'r prif ddeisebydd) yn glir.*

Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.