



REPRESENTATION SUPPORTING STATEMENT
FOR
REPLACEMENT CARMARTHENSHIRE LOCAL
DEVELOPMENT PLAN 2018-2033

**LAND AT MOUNTHILL FARM, OFF MOUNT PLEASANT,
LLANGUNNOR, CARMARTHEN**

**On behalf of Mr J. Jones, Mr A. Douch, Mr & Mrs T.A.C. Morgan,
Mrs J. Bromley-Davenport & Mrs S. Boggis-Rolfe**

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1.0 INTRODUCTION

- 1.1 Mr. A. Douch, Mr & Mrs T.A.C. Morgan, Mr. J. Jones, Mrs J. Bromley-Davenport & Mrs S. Boggis-Rolfe (the Land Owners) have instructed Evans Banks Planning Limited to prepare and submit a formal Representation for the inclusion within defined settlement limits, and as a formal Residential Allocation, of land at Mounthill Farm, off Mount Pleasant, Llangunnor, Carmarthen for the purposes of development in the Replacement Carmarthenshire Local Development Plan.
- 1.2 This Statement has been prepared in line with the Authority's published documents entitled *Revised Carmarthenshire Local Development Plan: Guidance Note* and *Revised Carmarthenshire Local Development Plan: Candidate Site Assessment Methodology*. The contents of this Statement therefore address the set criteria, determining the issues and each qualifying point raised within these documents. Consideration has also been given to ensuring that this formal submission complies with the guidance and requirements of *Planning Policy Wales (Edition 11)*, in relation to the preparation of development plans and the allocation of land for residential purposes as part of that preparation process.
- 1.3 The contents of this Statement therefore provide a comprehensive case for the inclusion of the land for residential development purposes within the defined settlement limits of Carmarthen, and it should also be read in conjunction with the accompanying supporting information and indicative site layout plan.
- 1.4 This site did comprise of a Candidate Site submission formally presented to the Council in August 2018, and referenced **SR/021/038**. Consideration has subsequently been given by our clients as to the conclusions of the Council in their Site Assessment Table (January 2023). The Council consider that "*Development of the site would have a detrimental impact on the character and setting of the settlement. Furthermore, there is sufficient and more suitable land available for development within the town to accommodate its housing need.*"

- 1.5 This Statement seeks to examine that conclusion and provide a comprehensive written response to demonstrate that the proposals seek to address and unequivocally overcome the two issues for non-inclusion as put forward by the Council.

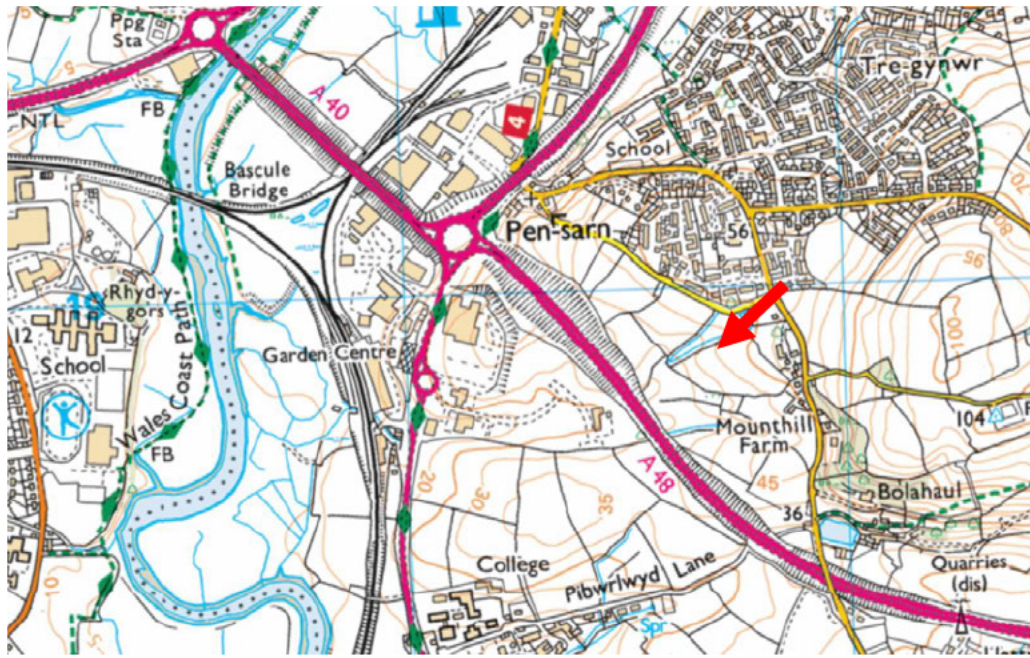
2.0 SITE CONTEXT

2.1 THE SITE

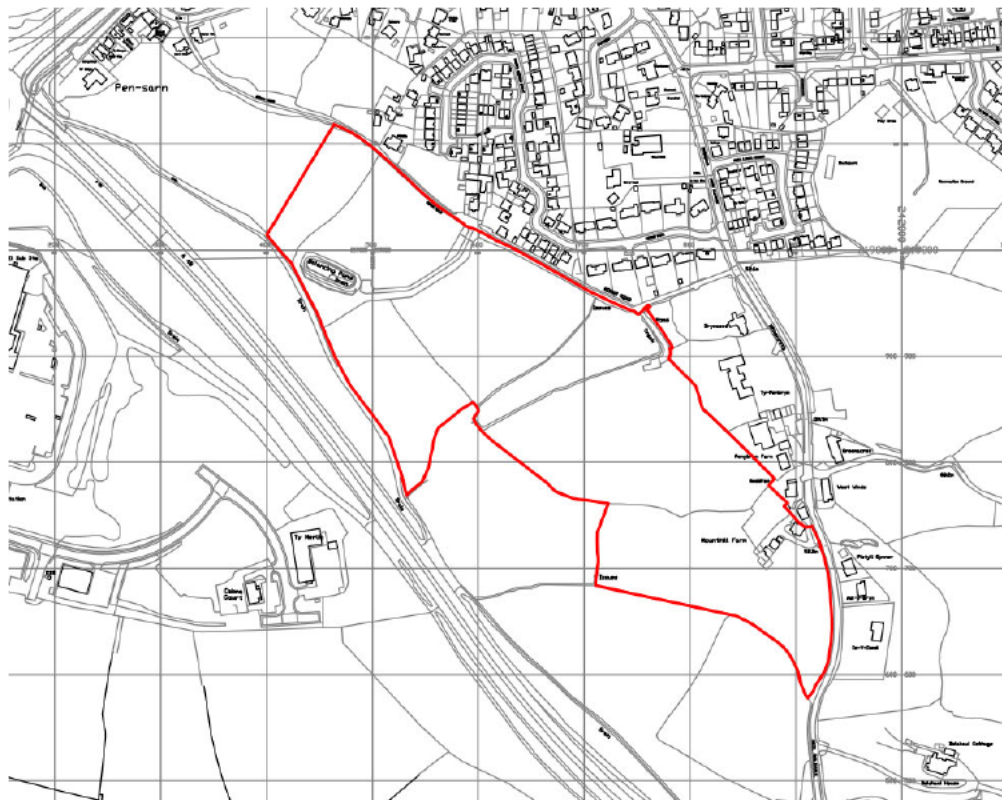
- 2.1.1 The Candidate Site comprises several adjoining field parcels set immediately off the rear of residential properties which flank the western side of Brynhyfyrd in Llangunnor. The land has a frontage to that road at the vehicular access to Mounthill Farm, which lies some 280 metres south of the junction of Brynhyfyrd with Roman Road. The proposed Strategic Site is found to be extending to a northern perimeter with the southern flank of Roman Road, as it runs westwards through Llangunnor to junction with Rhiw Babell, at the south-eastern outskirts of Carmarthen, near Pensarn.
- 2.1.2 The site consists of undulating to rolling pasture, interspersed with mature hedgerow and tree lines which form field boundaries, with the entire eastern perimeter of the site adjoining common rear garden boundaries with Brynhyfyrd properties. The complete site has an area of 10.2 hectares (25.1 acres) and has a road side frontage of some 140 metres with Brynhyfyrd. The four northern fields share a long boundary with Roman Road of some 370 metres which is almost continuous marked with a continuous mature hedgerow, with occasional tree specimens and series of agricultural metal gates at sporadic intervals to access each of the field parcels.
- 2.1.3 Roman Road is single width for most of its route west of its junction with Mount Pleasant / Brynhyfyrd, although there are occasional passing places for local traffic. Brynheulog farmhouse is owned by one of the Proposers and is set off the northern flank of road, with its former farmyard currently under construction to build 9 dwellinghouses. To date 6 detached and semi-detached houses have been completed, with a further three detached units planned with rear boundaries onto the

northern flank of Roman Road. The re-developed farmyard adjoins the much larger Roman Park development, which had originally 12 large executive properties spread around a cul-de-sac but has now been greatly extended with some 75 modern dwellings set in an estate formation off the north of Roman Road. With the exception of Brynheulog and two other established bungalows at Roman Road, no modern dwellings have vehicular access onto that unclassified road. The cul-de-sac known as “Maes-y-Nant” comprises of an additional 11 bungalows but accessed via the Roman Park estate. Those recently completed bungalows have rear garden boundaries which fall against the Roman Road northern flank.

- 2.1.4 Roman Road extends westwards to enter a narrow ravine which is heavily wooded to both flanks as the carriageway descends in level and gradient to its junction with Rhiw Babell, near Capel Babell. The junction is only some 70 metres distant from the overpass of the A40 dual carriageway which bridges over Rhiw Babell at this point before merging into Penymorfa Lane and Pensarn Road, and a large commercial estate adjoining the town of Carmarthen.
- 2.1.5 The southern and south-western parts of the Strategic Site adjoin a single field enclosure which adjoins the A48 dual carriageway as it approaches the Pensarn roundabout and convergence of the A48 with A40 and A484 roads. The western part of the Strategic Site has a boundary with a wooded embankment off the eastbound carriageway of the A48, but the embankment is some 70 metres in depth, and ascends over 10 metres in ground level to the levels of the western fields. Accordingly, the **Candidate Site cannot be viewed from the A48**, with the only field which is visible due to a lack of tree and landscaping cover from the dual carriageway not in the ownership of the Proposers.
- 2.1.6 The Candidate Site is identified by being edged in red on the plans below. Plan A illustrates its wider position within the suburb of Llangunnor and adjoining town area of Carmarthen, whilst Plan B provides a detailed Ordnance Survey map extract with the site perimeters identified.



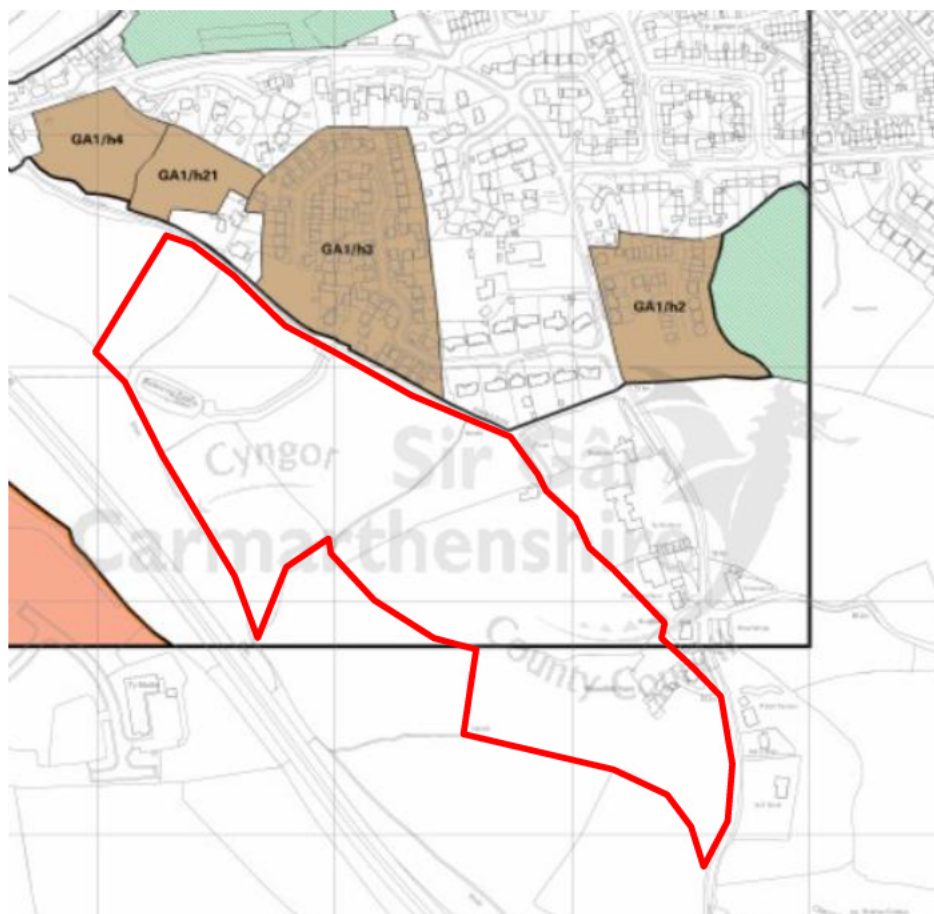
Plan A – wider setting of Llangunon with site highlighted



Plan B – detailed OS Plan of Candidate Site

2.2 SETTLEMENT SUSTAINABILITY AND SITE SETTING WITHIN THE CURRENT ADOPTED LOCAL DEVELOPMENT PLAN (2014) & SECOND DEPOSIT DRAFT (FEBRUARY 2023)

2.2.1 Under the provisions of the current adopted Local Development Plan (2008-21), the proposed land adjoins the Settlement Limits of Llangunnor. The site is shown edged in red at Plan C. It also shown at Plan D, being an extract from the Second Deposit Draft of the Replacement LDP to enable a comparison to be made:



Plan C – Settlement Limits of Llangunnor in 2014-adopted LDP



Plan D – Second Draft of Replacement LDP at Llangunnon

2.2.2 As can be seen, the Candidate Site adjoins and is well related to the draft defined Development Limits of Llangunnon at Carmarthen. At present the development limits are drawn tightly about the existing settlement form off the northern flank of Roman Road, and off the rear garden perimeters of individual properties which are orientated to front the western flank of Mount Pleasant. The Candidate Site seeks to form a new residential estate development to extend southwards off the modern estate developments that have taken place at Llangunnon over the last 10-15 years, namely at Roman Park, Maes-y-Nant and Maes Lewis Morris, where some 150 dwellinghouses have been successfully completed by two National Housebuilders, together with smaller, additional cul-de-sacs constructed by local house builders.

2.2.3 The Mounthill Strategic Site has excellent accessibility by foot and cycle to the nearby Llangunnon Primary School, public park and children's playground, and local

convenience store at Brynmeurig, where the local public bus service also stops upon its circulatory route about Llangunnor from Carmarthen Bus Station. Existing and new residents are also able to walk only a distance of several hundred metres along Roman Road to access Pensarn Retail and Employment Parks. From there, National Cycle Route 4 is to be found, as is easy access on foot to Carmarthen Rail Station.

3.0 Second Deposit Draft LDP (February 2023) **Housing Land Availability**

- 3.1 The Council published a Deposit Draft in February 2023, which is now subject of public consultation. Within the Second Deposit Draft, Llangunnor sits as part of the town of Carmarthen, being the Principal Service Centre (Tier 1) within the Carmarthen Cluster (Cluster 1). The Cluster aims to provide an additional **1690** residential units over the Plan period to 2033. In response to our clients' Candidate Site submission, the "Site Assessment Table" (January 2023) indicates that the Council consider that *"there is sufficient and more suitable land available for development within the town to accommodate its housing need."*
- 3.2 We have examined and researched sites which have been brought forward as Residential Allocations with the Second Deposit Draft. Policy HOM1 provides details of the residential Allocations in Carmarthen, Llangunnor and Abergwili as shown below. We have analysed each allocation and noted that the Council have highlighted when they consider each site will come forward for development. Given that the base date for this LDP has been running since 2018, **its first five years have already lapsed**, and accordingly many sites have already either been completed or are under advanced stages of construction. Years 6-10 are therefore taken to be from 2024 to 2028, with Years 11-15 being the end of the Plan Period from 2029 to 2033.
- 3.3 A total of 20 sites are listed, which include two large "Mixed Use" sites at West Carmarthen and Pibwrlwyd. Table 1 below itemises the 20 sites, their anticipated residential unit capacity and expected timescale for delivery.

PrC1/h2	Springfield Road	29	8.7	Year 6 - 10
PrC1/h3	*113 Priory Street	37	37	Year 1 - 5
PrC1/h4	Land off Parc y Delyn	17	1.7	Year 11 15
PrC1/h5	East of Devereaux Drive	10	5	Year 6 - 10
PrC1/h7	Penybont Farm, Llysonnen Road	9	0	Year 1 - 5
PrC1/h8	*Llansteffan Road	50	50	Year 6 - 10
PrC1/h9	Mounthill	5	0	Year 1 - 5
PrC1/h10	Brynhafod	20	2.4	Year 6 - 10
PrC1/h11	Rhiw Babell extension	12	0	Year 1 - 5
PrC1/h12	Castell Pigyn Road, Abergwili	35	4.2	Year 6 - 10 Year 11 - 15
PrC1/h14	Bronwydd Road (south)	44	2	Year 1 - 5 Year 6 - 10
PrC1/h15	Adj Tyle Teg, Llysonnen Road	7	2	Year 1 - 5 Year 6 - 10
PrC1/h16	Rhiw Babell	9	1.5	Year 6 - 10
PrC1/h17	4-5 Quay Street	5	0	Year 6 - 10
PrC1/h18	Castell Howell	7	2.1	Year 6 - 10

PrC1/h19	Land adjacent Ty Gwynfa	10	10	Year 1 - 5
PrC1/h20	5-8 Spilman Street	12	12	Year 6 - 10
PrC1/h21	Clos Tawelan	18	18	Year 1-5
PrC1/MU1	West Carmarthen	700	84	Year 1 - 5 Year 6 - 10 Year 11-15
PrC1/MU2	Pibwrlwyd	247	61.75	Year 11 - 15

Table 1 – Policy HOM1 Residential Allocations in Carmarthen

3.4 The following sites have been completed between 2018 and 2023 –

Penybont Farm – Site h7 – 9 units

Mounthill – Site h9 – 5 units

Rhiw Babel Extension – Site h11 – 12 units

Bronwydd Road (south) – Site h14 – 44 units

Ty Gwynfa – Site h19 – 10 units

The above five sites have therefore already contributed completions totalling **80 units** to the new plan Period.

3.5 We have analysed three proposed allocations, with the first being a major allocation in the 2014-adopted LDP, being has been “rolled-over” into the new Second Deposit Draft. **We have submitted separate formal objections under this current consultation period to each of the following sites**, and would summarise our objections as follows:

3.6 **West Carmarthen (PrC1/MU1) – 700 UNITS**

In Carmarthen, great emphasis within the Draft Plan has been placed upon the continued allocation of a large, proposed housing site at **West Carmarthen. The site is allocated for 700 residential units as Site PrC1/MU1.**

This allocation forms the bulk of a Residential Allocation carried over from the current LDP (2014-21) where the allocation **was for 1100 units.**

We have calculated that of that 1100 units only a total of 141 were constructed between the Plan Adoption date of December 2014 and start of this Replacement LDP Plan Period of 2018. Since 2018, a further 90 units have been constructed, and we note from Land Registry records that the last completed unit was sold at Maes Macsen in September 2021 (18 months ago).

Therefore, since adoption of the 2014 LDP, only a total of 231 units have been completed, equating to a build rate over that 7-year period of **only 33 units per annum.** This build rate is considerably lower than the anticipated and much promised delivery of 1100 units in the Plan Period of 2014 to 2021, **which would have expected an annual build rate of 157 units.** An actual return of 33 units per annum equates **to only a 21% build rate return** on that anticipated for delivery in the 2014-21 Plan.

Only 39 of those units were built in 2017-18 accordingly to the Joint Housing Land Availability Study 2018. The 2019 Study reveals that only a further 5 units were constructed in 2018-19. The August 2019 Study reports that **none were under-construction at that time.** During 2020 and 2021 when Covid-19 restrictions were at their peak, more units were constructed than at any other time in that LDP plan period. Therefore, we would submit at this point in our formal objection that **low build rates cannot be held, and probably will be subsequently argued by the Council, to be reduced as a consequence of Covid-19 restrictions.**

It is equally noteworthy that at a time when the housing market was at its most buoyant in 2022, that the only housebuilder with a track record on the site had

ceased construction and sold their last completion (September 2021). We submit that this is testament to the weak marketability and sales demand of the West Carmarthen Site.

Only 231 units out of 1100 units of the Strategic Site have therefore been completed in the 2014-21 LDP period, which equates to **only 21%** of that allocated total.

The Replacement LDP seeks to delivery 700 units over a Plan Period from 2018 to 2033. The extract from the Proposals Map for Carmarthen reveals that the figure includes for 90 units constructed between 2018 and 2021, leaving a balance of **610 units envisaged in the remainder of the Plan Period to 2033**. That would equate to a build rate of **61 units per annum over a 10-year period**. Based upon previous build rates at this site, such a predicted build rate can be described as overly optimistic, being **nearly double that actually achieved on the site to date**.

The West Carmarthen draft allocation includes parcels of residential allocations off the flanks of the A40 that were previously allocated within the Carmarthen District Local Plan (1997), and subsequent Carmarthenshire Unitary Development Plan (2003). No progress was made in bringing the sites at Llysonnen Road and Old St. Clears Road forward, and yet it was allocated within the Local Development Plan in 2014. Consequently, twenty-seven years of Development Plan allocations have elapsed without any signs of delivery of the majority of this site.

Clearly, there is no historic demand for a site of this scale in this part of Carmarthen. More physically challenging sites, such as the Roman Park site in Llangunnor by Redrow Homes, and the Mount Pleasant site (Maes Lewis Morris), also in Llangunnor, by Lovell Homes have come forward, and been fully completed, long before West Carmarthen. Yet still the Council is prepared to allocate the site once again for hundreds of residential units in a new Development Plan.

3.7 **Pibwrlwyd (Site PrC1/MU2) – ALLOCATION OF 247 UNITS**

We would also question the allocation of land at **Pibwrlwyd** in Carmarthen, being partly for a residential development of 247 units on the Parc Pibwrlwyd development. The Council published and subsequently adopted Supplementary Planning Guidance on “Pibwrlwyd” in 2014.

Paragraph 3.2 was quite specific in that “*The LDP describes the acceptable uses on the site as follows: “The proposed use for the site is for a business park centred around employment uses (Use Classes B1, B2 and B8), with uses associated with, and ancillary to the existing Coleg Sir Gâr.”*

*A development brief in the form of SPG has been prepared and adopted. This in setting out appropriate uses under Use Classes B1, B2 and B8 for the employment element of the site also explores other compatible uses. **Residential use on this site is not considered appropriate.**” (self-emphasis)*

The Council has seen fit to re-examine the Development Plan status of this Mixed-Use Site and concluded that residential uses should now be brought forward, with a residential capacity of 247 units. No explanation has been provided within the supporting text to LDP policies to warrant a dramatic departure from the adopted SPG.

The site is completely and physically divorced from established housing at Pensarn and Llangunnor. It is physically separated by foot from local schools, community facilities and play facilities by the A40 / A48 trunk road network, with only a dark and insecure pedestrian underpass linking it to the Pensarn Commercial Area.

New housing at this location would accordingly be quite alien in form to the long-established business and education uses at Pibwrlwyd. New residents would in order to access their new homes would have to drive through an established retail park to access their homes. Such a practice is contrary to the underlying objectives of National Planning Policy Wales which seeks to segregate residential and commercial land uses to avoid potential future conflicts in terms of noise, light disturbance, traffic generation (particularly if HGVs are delivering to the Retail Park), and general disturbance to residential amenities.

3.8 **Land off Parc-y-Delyn (PrC1/h4) – ALLOCATED FOR 17 UNITS**

This new allocation suffers from including Tree Preservation Orders imposed upon specimens at the proposed vehicle access onto Parc-y-Delyn. The site also appears covered in rich flora and fauna and could harbour biodiversity interests.

- 3.9 There are several **satellite settlements about Carmarthen** contributing housing allocations to the Carmarthen Cluster Total of 1690 dwellings. However, we have discovered that many allocations have simply and conveniently been “rolled over” from the 2014 adopted LDP, or in some cases even earlier from the 2006 Unitary Development Plan. No explanation, evidence or demonstration of viability or deliverability has been provided within the Site Assessment Table (January 2023) to demonstrate such a widespread practice.

The following sites are examples of such dormant sites:

Cae Camfas, Heol Llanelli, Pontyates (SeC1/h4) – ALLOCATED FOR 8 UNITS

This site in Pontyates was allocated in 2014 in the Local Development Plan, and yet no applications for planning permission have been submitted in the entire 8 years of the Plan Period.

3.10 **Gwyn Villa, Llanpumsaint (SuV12/h1) – ALLOCATED FOR 20 UNITS**

This site in Llanpumsaint was allocated in 2014 in the Local Development Plan, and yet no applications for planning permission have been submitted in the entire 8 years of the Plan Period.

3.11 **Fronheulog, Cynwyl Elfed (SuV1/h1) – ALLOCATED FOR 8 UNITS**

This site in Cynwyl Elfed was allocated in 2014 in the Local Development Plan, and also the 2008 UDP, and applications for planning permission have been submitted for only two individual houses in the entire 15 years of the above combined Plan Periods have been commenced.

- 3.12 We submit that the above draft allocations amount to **910 units** (after the 90 already constructed at West Carmarthen is deducted). That balance is heavily skewed to sites “rolled-over” from the 2008-21 LDP, with no demonstrable evidence as to why that rolling over practice is being pursued, and shown as being reasonable and “sound” for the purposes of delivery in a Replacement LDP.
- 3.13 West Carmarthen should be significantly reduced in scale, and in the case of Pibwrlwyd and above-named satellite allocations be omitted from the Plan and that housing allocation be redistributed to Candidate Sites, of up to 250 units such as that proposed at Mounthill. There is clear evidence in the rapid completion of the Roman Park, Maes Lewis Morris and Maes-y-Nant developments at Llangunnor, which border the Candidate Site are proof that moderately sized sites are far more likely to be brought forward and developed in full by National and Regional housebuilders, in market-proved neighbourhoods, where completion delivery off the back of strong sales are guaranteed.
- 3.14 In the case of the Mount Pleasant and Roman Park areas, there are little signs within the immediate locality of properties for second sale, and no evidence of undeveloped land available within this part of the settlement limits, which is a strong indicator of a healthy property market at Llangunnor. Consequently, it is a location where housing proposals are **deliverable, assisting to meet housing needs** in this part of the Carmarthen Cluster.

4.0 THE PROPOSAL'S ALLEGED IMPACT UPON SETTING AND CHARACTER UPON LLANGUNNOR

- 4.1 The Council in their Site Assessment Table (January 2023) are opined that the *“Development of the site would have a detrimental impact on the character and setting of the settlement.”* However, there is no detailed justification or evidence provided to warrant such a conclusion.
- 4.2 The Candidate Site comprises of a series of agricultural fields which are set at a corresponding ground level to residential properties fronting Mount Pleasant, which forms its entire eastern perimeter. It will appear as an extension of the modern cul-de-sac developments that have evolved and been completed in Llangunnor in the last LDP Plan Period, namely Morgan Drive (Roman Park), constructed by Redrow Homes, and Maes Lewis Morris, constructed by Lovell Homes, and latterly Maes-y-Nant, completed by GRD Developments. Photos 1 and 2 below, taken in March 2023 by aerial drone, illustrates how the modern residential estates off the northern side of Roman Road fall to the edge of the Candidate Site, **and thus new development will be seen to seamlessly integrate into that setting.**



Photo 1 – view looking west / north-west to Roman Road and Brynheulog and Maes-y-Nant completions



Photo 2 – view east / north-east to Roman Park completed residential estate

- 4.3 The site is set between established residential properties at Mount Pleasant and the embankment of the A48 trunk road. That embankment is however considerably wide at this point, and heavily vegetated with mature trees and landscaping. That embankment borders further grazing enclosures which fall against the western edge of the proposed Statregic Site, and thus act as a green buffer to the trunk road. Consequently, there is no viewpoint of the Candidate Site from that dual carriageway. Photos 3 and 4 below illustrate the dominant natural screen of A48 embankment from viewpoints within the site and alsong the A48 trunk road.



Photo 3 – aerial viewpoint looking west at A48 landscaped embankment, wholly screening views of the site from the A48 and Parc Pibwrlwyd



Photo 4 – view upon A48 carriageway of high expanse of landscaped embankment naturally screening all views of Candidate Site

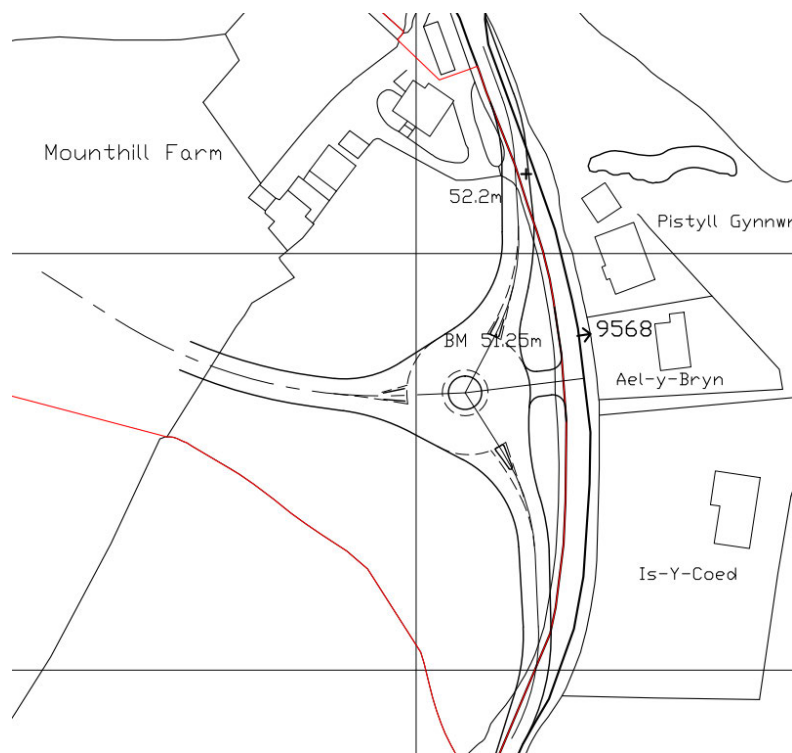
- 4.4 The Candidate Site comprises undulating and rolling semi-improved pasture, shown in Photos 5 and 6, which form up to the rear garden perimeters of Mount Pleasant properties. Field boundaries comprise well-managed hedgerows and tree lines which can all be retained and preserved in situ as part of a phased residential development commencing from a new roundabout interchange near Mounthill farmyard, as shown in Plan E below. The development of the site can extend northwards to reach Roman Road, but not link to it, except for use by pedestrians and cyclists.



Photo 5 – View looking south / south-east at Candidate Site perimeter with Mount Pleasant properties



Photo 6 – view south to Mounthill Farm and illustration of well-defined tree lines which can be fully retained as part of a Strategic Development



Plan E – Proposed access onto Mount Pleasant / Brynhyfryd with new roundabout interchange

- 4.5 The Candidate Site submission has demonstrated that the setting and character of Llangunnor can be preserved, without detriment to any visual amenities, nor those of the neighbouring residents at Mount Pleasant. The site is “sandwiched” between the A48 cutting and Mount Pleasant, and thus provides no greater contrast to the local setting than the Council’s vision for developing Pibwrlwyd off the opposite side of the A48. If residential development is welcomed upon that greenfield plateau, then conversely there is no argument that can be presented by the Council to warrant a different interpretation of Mounthill.
- 4.6 Similarly, it could be argued that the part development of West Carmarthen at the western extremity of the town across open, rolling fields, devoid of defensible boundaries is not akin to placing a detriment upon the surrounding open countryside about Travellers Rest? For reasons already presented in this Statement, there is a straight choice in the consideration of whether the Replacement Local Development is deliverable in Carmarthen, and that is with the right choice of a deliverable site at Mounthill. Any argument based on visual setting and character is without basis at Mounthill, and no different to the draft allocation of Pibwrlwyd and West Carmarthen as edge-of-settlement Residential Strategic Sites.

5.0 CONCLUSION

- 5.1 The Candidate Site is significant in overall size, but located in undulating fields extending south off modern, residential estates which have been constructed in recent years off Roman Park, and Maes Lewis Morris. Individual and established residential development is located off the entire eastern side of the Candidate Site, being houses fronting Mount Pleasant and Brynhyfryd. The field enclosures tend to be well screened from public view by virtue of high perimeter trees which shelter the western site from the A48 dual carriageway in that trunk roads' approach / exit from Carmarthen. High and mature vegetation surmounts tall embankments along that highway, so as to completely screen the plateau of fields at the Candidate Site.
- 5.2 The Site lies within close proximity and walking distance to the existing community and local services of Llangunnor. It lies in walking and cycling distance via a pleasant stretch of minor highway along Roman Road to Pensarn Retail and Employment Park, National Cycle Route 4 and Carmarthen Rail Station. Such close distances on foot and cycle will ensure that the future development of this Candidate Site makes a positive contribution to both national and local sustainable development objectives.
- 5.3 The Council have provided no explanation for their contention that the development of the site will cause detriment to the setting and character of the locality. The proposed development is no different in greenfield form to that proposed at West Carmarthen and Pibwrlwyd, being undulating, enclosures set off a good road network and located with perimeters to a trunk road system.
- 5.4 This Statement has interrogated the Council's assertion that there remains sufficient land allocated for housing growth elsewhere in the settlement. This Statement has examined all 20 draft allocations in Carmarthen, and others in the satellite villages which contribute to the Carmarthen Cluster allocation total of 1690 units. The analysis has revealed that **over 900 residential units proposed for the Carmarthen Cluster are undeliverable**, mainly as a cause of a lack of marketability, poor sales demands, and, in the case of Pibwrlwyd, conflicts with established planning policies which aims to segregate employment and residential land to avoid future amenities' conflicts.

5.5 The Candidate Site has been demonstrated the following considerations:

- a) It is not harbouring any ecological interests, evidenced through a comprehensive Preliminary Ecological Appraisal as semi-improved agricultural land, and reported accordingly within the submission.
- b) All perimeter and inter-field perimeters can be fully retained as part of a residential development.
- c) The site does not fall within any designated flood zone, nor impacted by surface water ingress.
- d) It does lie upon any historic coal legacies, nor industrial past use of the land at Llangunnor.
- e) It is able to be successfully accessed off Brynhyfryd via a newly formed roundabout interchange. A new series of pedestrian footways within the site will provide Brynhyfryd and Mount Pleasant residents with a safe refuge to walk to school, public park and convenience shop at Brynmeurig.
- f) Roman Road can be re-designated as a public footway and cycleway for all existing and proposed residents
- g) The site benefits from being located in immediate proximity to modern residential developments, which have been fully implemented in the last LDP Plan Period. The Llangunnor locality has been extraordinarily successful in **demonstrating deliverability** of those sites allocated for development, evidenced by high market sales, and attractive house designs and layouts. In short, Llangunnor is a deliverable location to provide future housing growth in a Replacement Local Development Plan.

5.6 In view of the above and the information provided within this Statement, it is respectfully requested that the Candidate Site in question be allocated for Residential Development, within settlement limits of the Carmarthenshire Local Development Plan 2018-2033.