



ALTERNATIVE SITE SUPPORTING STATEMENT
FOR
REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT
PLAN 2018-2033 DEPOSIT DRAFT

LAND AT "OAKLANDS," FURNACE ROAD, BURRY PORT

On behalf of
Mr. C. Hurley

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INTRODUCTION

1.1 Evans Banks Planning has been instructed by Mr C. Hurley (the Landowner) to prepare and submit a Representation for an Alternative Site to the Second Deposit Draft for the allocation of land at "Oaklands," Furnace Road, Burry Port for the purposes of residential 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 issues and each qualifying point raised within these documents

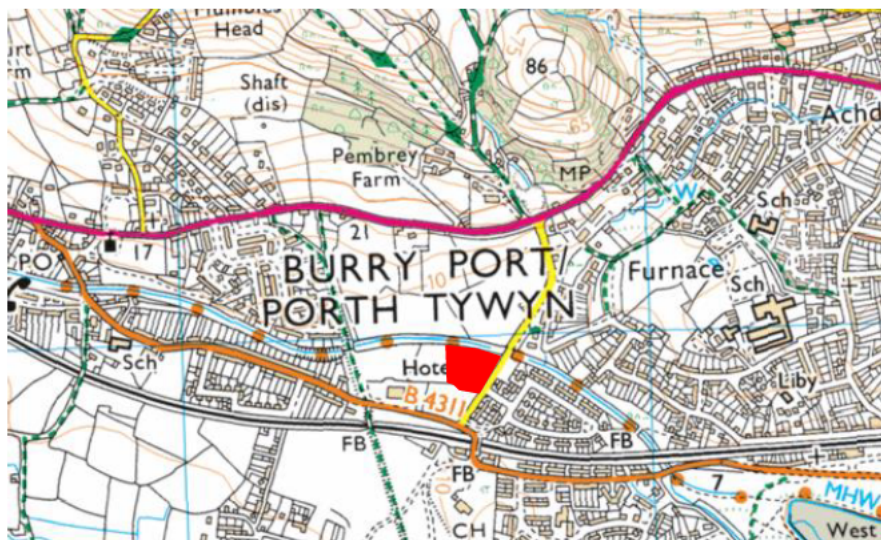
Consideration has also been given to ensuring that this formal submission complies with the guidance and requirements of *Planning Policy Wales (Edition 11)*, in relation to the preparation of development plans and the allocation of land for residential purposes as part of that preparation process.

1.3 The contents of this Statement therefore provide a comprehensive case for the allocation of the land for residential development purposes and it should also be read in conjunction with the accompanying supporting information and indicative site layout plan.

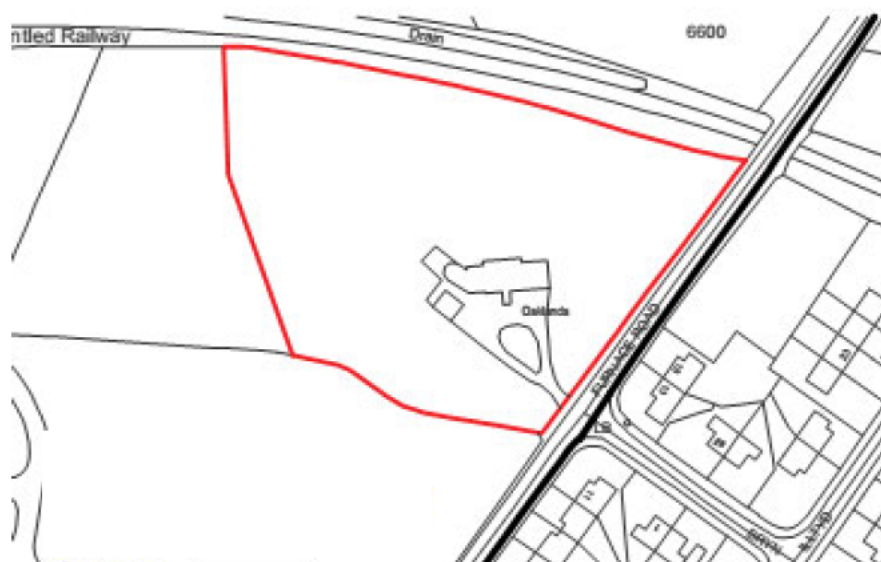
2.0 SITE CONTEXT

2.1 THE SITE

- 2.1.1 The Alternative Site relates to part of a generally level, but large domestic curtilage associated with a detached dwellinghouse known as “Oaklands.” It is set immediately off the western flank of Furnace Road to the western side of the settlement of Burry Port. The Alternative Site is an irregularly shaped enclosure with the house set within the southern half of the site, and lawned garden area stretching north to an embankment with a former railway cutting.
- 2.1.2 The southern boundary of the site lies parallel with the boundary of the Ashburnham Hotel grounds and a similarly level enclosure at that site and the junction of Furnace Road with Ashburnham Road. That southern boundary is tree-lined, with the frontage with Furnace Road marked by an intermittent hedgerow for its 95 metres length.
- 2.1.3 The western perimeters of the site fall onto scrub which is also gently level to undulating and is set to separate Burry Port from Pembrey, but that undeveloped gap is only some 175 metres from the domestic curtilage of Oaklands to the eastern fringes of established houses at Pembrey.
- 2.1.4 The Site relates to some 0.99 hectares (2.45 acres) of well-maintained lawns with established, two-storey dwellinghouse. It has an independent vehicular driveway off Furnace Road set directly opposite established residential properties off the eastern flank of that road, where two-storey semi-detached local authority-built houses are concentrated as part of the “Brynillyd Estate”.
This part of Burry Port is characterised by modern housing, mostly of 1960s and 70s origin and local-authority-built. The Brynillyd estate also includes Brynymor, which extends over several access and off one access on to Furnace Road, directly opposite the access to Oaklands.
- 2.1.5 The Site field parcel is identified by being edged in red on the plans below. Plan A illustrates their wider position with the settlement of Burry Port. Plan B provides a detailed Ordnance Survey map extract with the site perimeters identified.



Plan A – setting of Oaklands at Burry Port



Detailed OS Plan - Plan B

2.1.6 The Site consists of a large, domesticated curtilage which already contains a sizeable residential property. The development of the site which will form a mirrored extension to the Brynilltyd estate, appearing as a continuation of the existing row of semi-detached properties and single detached house off the opposite flank of the Furnace Road carriageway. It is therefore well defined by those existing natural and man-made perimeters.

Plan C below provides a Google Earth image of the site and its surroundings, in which the above physical features are readily apparent.



Plan C – Google Earth image of Site

2.1.7 The Site's well-defined perimeters and immediate proximity to the adjacent established residential properties off the Furnace Road highway, are shown within the photographs below. The photos also depict the existing boundary fence separating grazing fields and access road of the Candidate Site.



Photograph 1 – view of Site with existing dwelling set centrally with large curtilage



Photograph 2 – view from existing Furnace Road carriageway looking over Site with Oaklands dwelling in background



Photograph 3 – view of properties off opposite, eastern flank of Furnace Road



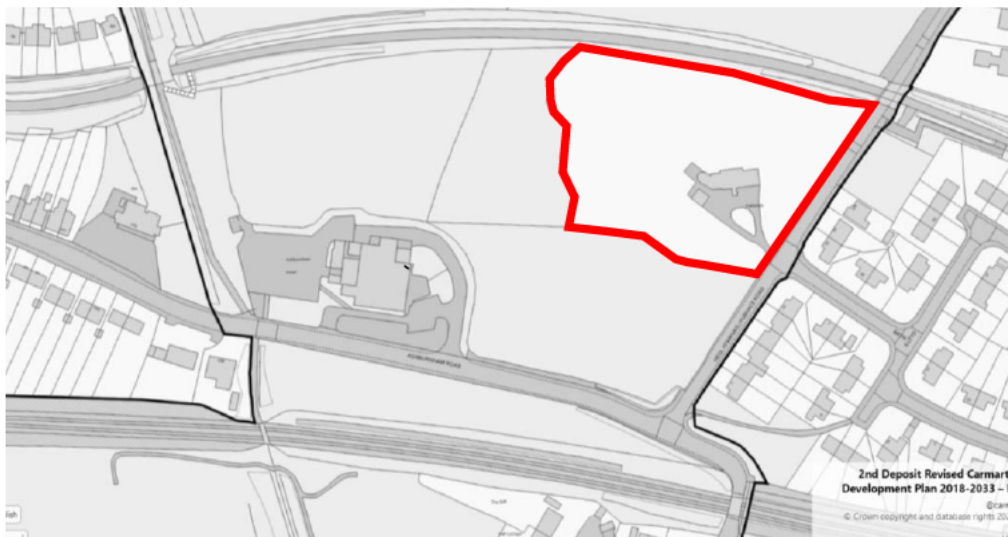
Photograph 4 – view of southern tree-lined boundary with Ashburnham Hotel enclosure



Photograph 5 – view from bridged crossing of former railway line (now cycle path) looking at vegetated northern boundary of site

2.2 SETTLEMENT SUSTAINABILITY AND SITE SETTING WITHIN DRAFT LOCAL DEVELOPMENT PLAN

2.2.1 Under the Second Deposit Draft of the Carmarthenshire Local Development Plan, Oaklands falls adjoining the Settlement Limits for the settlement of Burry Port. The large domestic curtilage lies immediately adjoining established estate properties off the eastern flank of Furnace Road. The site is edged in red on the map extract.



Plan D – Extract from Second Deposit draft LDP Proposals Map of Burry Port

2.2.2 As can be seen, the Site adjoins and is well related to the Second Draft LDP Development Limits for Burry Port, and also within walking distance of the village centre

at Gwscwm Road to the north-east via the existing surfaced pavement of Furnace Road and east along Ashburnham Road.

2.2.3 Access to the Site could be achieved with a new junction onto Furnace Road, with the existing house driveway and access retained. The proposed access road would lead into a proposed cul-de-sac development, with conventional hammerhead turning area.

2.2.4 The Site's position and proposed use therefore represents a natural and logical location for the settlement's expansion in the context of adjoining established and proposed residential development.

As detailed above, the Site adjoins and in effect lies within the existing settlement and form of Burry Port. The existing built form and pattern of the settlement follows key access routes, such as the A484 Gwscwm Road and Lando Road, to the north and Ashburnham Road. The established town centre at Station Road extends off Ashburnham Road, with multiple cul-de-sac modern developments concentrated to the mid-hillslopes to the north of the A484 road, or south to the main railway line extending west to east from Burry Port to Kidwelly.

Burry Port is particularly popular to new homeowners due to its coastal position, and short drive to Llanelli, and in particular the A484 link to Carmarthen.

2.2.5 In terms of the Site is located within easy walking and driving distance of all community facilities and local services present and provided within the settlement of Burry Port. Access to further facilities in the towns of Llanelli and Carmarthen can then be gained by regular bus services, stops for which are located some 90 metres from the Alternative site at the junction of Ashburnham Road with Furnace Road.

The sustainable position of Burry Port should therefore be given full consideration when considering potential future growth options.

2.2.6 Housing Land Availability within Second LDP Draft

We have examined and researched sites which have been brought forward as Residential Allocations with the Deposit Draft. Burry Port falls under the Llanelli Cluster which extends along the Burry Estuary coast from Kidwelly in the west to Bynea in the east, and north to Llangennech and Hendy about the M4 corridor.

Great emphasis within the Draft Plan has been placed upon the continued allocation of proposed housing sites still left allocated from the 2014-21 Local Development Plan. Figure 1 below provides an extract from the Deposit Draft Schedule of Housing Sites from Policy HOM1, relating first to Burry Port, and accordingly across the remainder of the Llanelli Cluster.

Burry Port		
SeC4/h1	Gwdig Farm	105
SeC4/h2	Burry Port Harbourside	364
SeC4/h3	*Glanmor Terrace	32

Extract from Policy HOM1 – Burry Port

PrC2/h1	Beech Grove, Pwll	10
PrC2/h3	Parc y Strade	?
PrC2/h4	North Dock	210
PrC2/h22	Cwm y Nant, Dafen	202
PrC2/h23	Dafen East Gateway	150
PrC2/h24	Clos Ffordd Fach	13
SeC4/h2	Burry Port Harbourside	364
SeC6/h2	Land between Clayton Road and Bronallt Road, Hendy	20
SeC7/h1	Box Farm	7
SeC7/h3	Golwg Yr Afon, Llangennech	50
SeC8/h1	Ffos Las (numbers)	45
SeC8/h3	Golwg Gwendraeth	141
SuV22/h2	Land adj. to Ty Newydd, meinciau Rd, Mynyddygarreg	8
SuV23/h2	Adjacent Little Croft, Five Roads	25

Figure 1 – Selection of Deposit Draft Housing Schedule in Llanelli Cluster

We note that within the Proposals Map for Burry Port, it included for three sites, **two of which have been completed** at Goodig and Glanmor Terrace leaving just one proposed site, which being the Harbourside site for 364 dwellings. The site has been marketed by the County Council for many years, and despite its coastal position, has failed to receive firm interest and any form of detailed planning application. Ground conditions require extensive remediation of former historic uses.

2.2.7 The Llanelli suburbs of Llwynhendy / Cefncaeau and Dafen, where four of the above allocations are identified, has not altered since the 2014 adopted LDP and remain undeveloped but re-allocated in the Deposit Draft.

Cwm-y-Nant (PrC2/h22) and **Dafen East Gateway** (h/23) were both sites allocated within the Carmarthenshire Unitary Development Plan (2006) and as mentioned above, within the Local Development Plan (2014) as sites GA2/h27 and h/30 & h/31. They

have a combined total of **352 dwellings**, although neither site has been the subject of any detailed planning application, let alone market interest.

The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across all Dafen sites. Clearly, any residential development upon either site will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites.

2.2.8 **Beech Grove at Pwll** (PrC2/h1 has remained allocated for 10 units for the last 20 years in Development Plans. No application for planning permission has even been lodged at the site.

2.2.9 **Cae Linda** in Trimsaran (SeC8/h2) for 20 units has been in Development Plans stretching back to the Llanelli Borough Local Plan in 1995. It has only been developed with 5 houses, and thus its continued allocation for twenty more units in the draft LDP must surely come under question?

2.2.10 Consequently, at least twenty years of Development Plan allocations have elapsed without any signs of wholesale delivery of these sites. Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use.

We submit that the above draft allocations be omitted from the Plan, and that housing allocation be redistributed to Alternative Sites, of circa 20-25 units such as that proposed at "Oaklands" at Burry Port. There is clear evidence that such moderately sized sites are far more likely to be brought forward and developed in full by regional housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.

2.3 **Settlement Facilities**

2.3.1 The Site at Furnace Road lies some 10 minutes' walk from the centre of the town at Station Road.

Public bus stops lie immediately off the junction of Furnace Road with the Ashburnham Road carriageway.

Main public bus services call at these bus stops, and further stops are available at Stockwell Lane in particular:

- Service 111 – Kidwelly to Swansea, calling at Pembrey, Burry Port, Llanelli, Trostre, Gorseinon, and Fforestfach
- Service X11 – Carmarthen to Swansea, calling at Ferryside, Burry Port, Llanelli, Trostre and Fforestfach retail parks

2.3.2 The site is within 10 minutes' walk, to the London Paddington to Fishguard / Pembroke Dock rail service at Burry Port station.

2.3.3 The Site lies within a 5-minute walking distance of Pembrey Primary school at Ashburham Road.

Ysgol Y Strade and Burry Port Secondary Schools are located at Llanelli and Burry Port respectively, with pupil bus transport available to Ysgol-y-Strade.

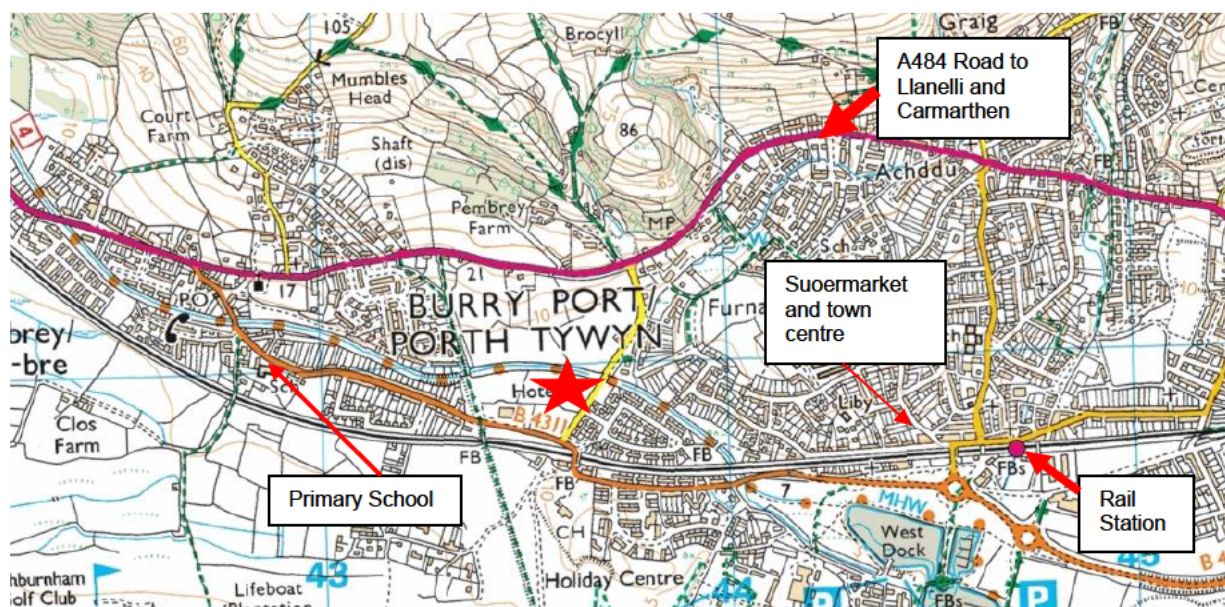
The CCTA campuses at Llanelli and Carmarthen are also available via student bus services.

2.3.4 Nearby Pembrey contains a post office, two public houses and community hall along Ashburnham Road.

Burry Port town centre provides a range of small comparison shops, supermarket, petrol filling station, public houses / cafes, offices, rail station and industrial estates.

Plan E below provides an indication of the proximity of the site to Burry Port town centre, with its rail station and strategic road network to Llanelli and Carmarthen.

The **red star** denotes the position of the Site.



Plan E – proximity of Site to Burry Port town centre

3.0 THE PROPOSAL

3.0.1 As part of the requirements for the promotion of sites for residential development, this Statement is accompanied by an indicative layout for a potential residential scheme that could be developed on the site. It should be emphasised that the accompanying layout is for illustrative purposes and that other design solutions for the site could also be reached. Notwithstanding this, the accompanying layout drawing has taken account of all the potential assets and constraints of the site and demonstrates that it is capable of delivering **18 houses** in a deliverable and sustainable manner. The following information therefore expands on this principle.

3.1 DEVELOPMENT OVERVIEW

3.1.1 It is proposed that the Site be allocated in the replacement LDP for the purposes of a total of 18 residential units. As detailed above, the accompanying illustrative layout (reproduced below at Plan F) demonstrates that the site is capable of accommodating this number in a deliverable and sustainable manner.



Site layout plan - **Plan F**

3.1.2 As illustrated above, the site is capable of accommodating detached and semi-detached, two-storey houses to replicate and being reflective of the existing form and density of residential development in the immediate locality.

- 3.1.3 With regards to access, it is proposed that the Candidate Site would be served by a 6.0 metres wide radii junction onto Furnace Road. This stretch of Furnace Road experiences vehicle speeds which are respectful of the 20mph speed limit, given the presence of speed humps. Visibility splays of 2.4m x 43m can be achieved within this built-up locality.
- 3.1.4 The Site proposals can fully retain all existing boundary treatments, being the established mature hedgerows across the southern and northern sides of the field, which would be retained and managed wherever possible.
- 3.1.5 Although due to the proximity of existing facilities in Burry Port, the proposal does not include any formal areas of play or open space. It is recognised and supported that an element of the proposed units could be Affordable in nature, or contributions made to support affordable housing elsewhere in the Llanelli locality, which under the provisions of the current LDP would be in the region of 20% of the total number of dwellinghouses.

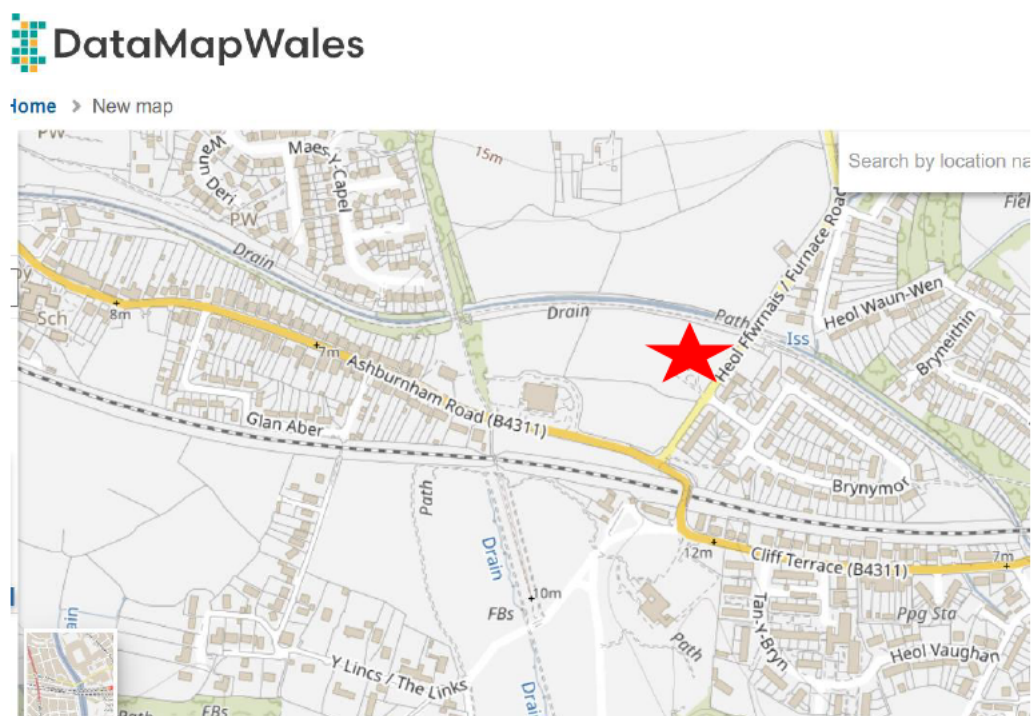
3.2 INFRASTRUCTURE CONSIDERATIONS

- 3.2.1 Development of the Site for residential units would be served by mains water, gas, public sewer and electricity connections, which either lie within the respective stretch of Furnace Road carriageway.
- 3.2.2 The estate road highway itself is equipped with roadside gullies and drainage which aid to discharge run-off from the carriageway. The proposed access to the site could connect to the existing highways drainage.
- 3.2.3 The Site comprises of domesticated lawns. There are no areas of significant marshy grassland or water-logging evident, and therefore at first inspection, it appears that the site benefits from good ground percolation of rainwater.
- 3.2.4 Soakaways would be the most sustainable means of disposing of surface water from individual properties. If required, attenuation measures can be deployed on site to control surface water run-off during extreme storm events, which could also allow for additional capacity, making allowances for climate change. Such features can be hard engineered in the form of small to modestly-sized subterranean storage crates or tanks. The field enclosures are served by a series of drainage ditches along the fields boundaries, which eventually combine and inter-connect discharging surface water which eventually discharge to the Estuary. It is considered that as a result of on-site features, there would be a number of options available to a future development of the site in terms of surface water disposal.

4.0 ENVIRONMENTAL CONSIDERATIONS

4.1 ECOLOGICAL ATTRIBUTES

- 4.1.1 The Site has been assessed against data held on the “*Data Map Wales*” website, which details statutory and non-statutory National and Local sites of ecological importance. Plan G below provides an extract of those records as applied to the Burry Port & Pembrey locality. The **red star** denotes the position of the Alternative Site.
- 4.1.2 The records reveal that the Site does not include or adjoin any national or local nature conservation designation. The site is some 0.5 kilometres distant from the Special Area of Conservation at Carmarthen Bay.
- 4.1.3 Any biodiversity assets that may be present at or adjoining the Site have been given full consideration with regards to exploring its potential for residential development. This has included the proposed retention and management of existing boundary tree and hedgerow features. It is envisaged that the entirety of mature trees off the northern and southern boundaries could be retained and managed further for uninterrupted biodiversity gain.



Plan G – Extract from Data Map Wales detailing any known ecological interests

- 4.1.4 In the wider context, the site does not adjoin or form part of any local or national nature conservation designation. There are a number of areas of established woodland, which are clearly evident on the Google Earth image presented as Plan C above. These will not be affected by development within the Site, as the indicative site layout provides

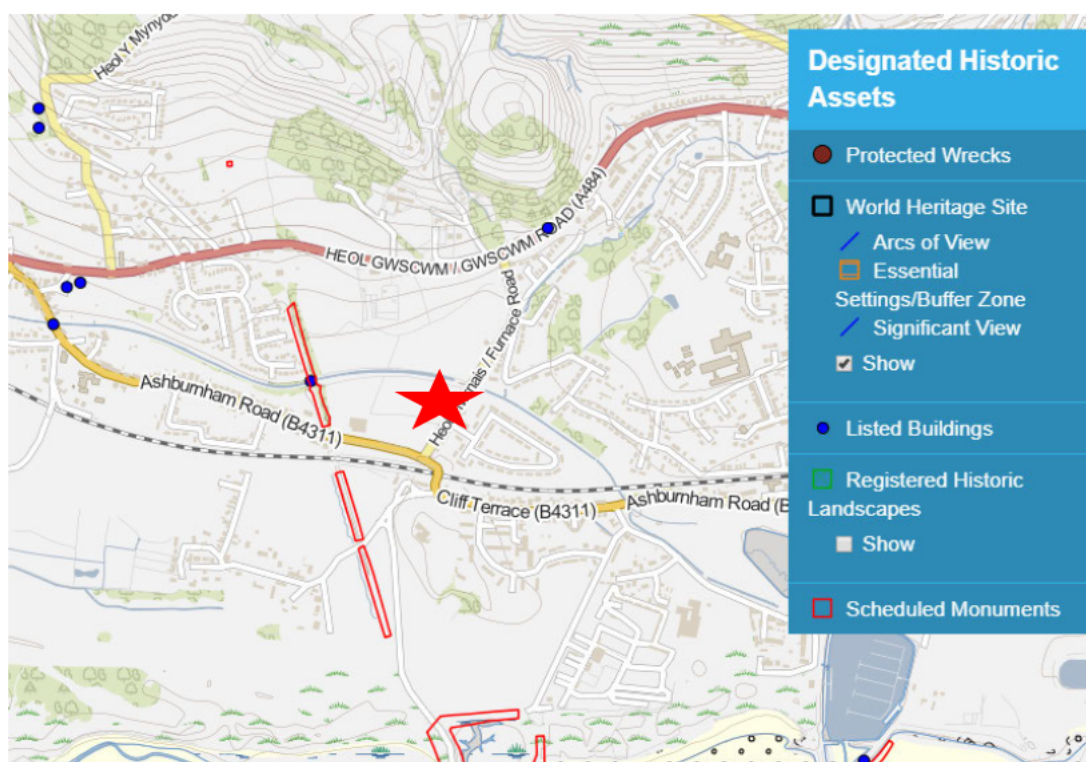
for enough buffer space to those existing root systems and crown spreads, and can be fully retained in situ, providing continued ecological retention and connectivity.

- 4.1.5 It is considered that any statutory and non-statutory designations are significantly distant from the site, which will ensure that its development would have no detrimental impact on them.

4.2 HISTORICAL ASSETS

- 4.2.1 The Site has been assessed for any proximity to known and designated Historic Assets, using the “Cof Cymru – National Historic Assets of Wales” from CADW’s website. An extract from Cof Cymru Assets map for this part of Burry Port is reproduced below as Plan H The red star denotes the position of the Candidate Site.

- 4.2.2 The Site does not include or form part of any Listed Buildings or proximity to a Conservation Area. There are no Conservation Areas located near the Candidate Site. The proposed development of the Site would not have any detrimental impact on the setting or interest of any nearby historical asset.



Plan H – Extract from Cof Cymru Historic Assets website

4.3 ENVIRONMENTAL CONSTRAINTS

4.3.1 Potential for Risk from Flooding

The Site has been assessed against the Flood Map for Planning, prepared by Natural Resources Wales. An extract from the FMfP map is reproduced below as Plan I, with the site denoted by a red star.

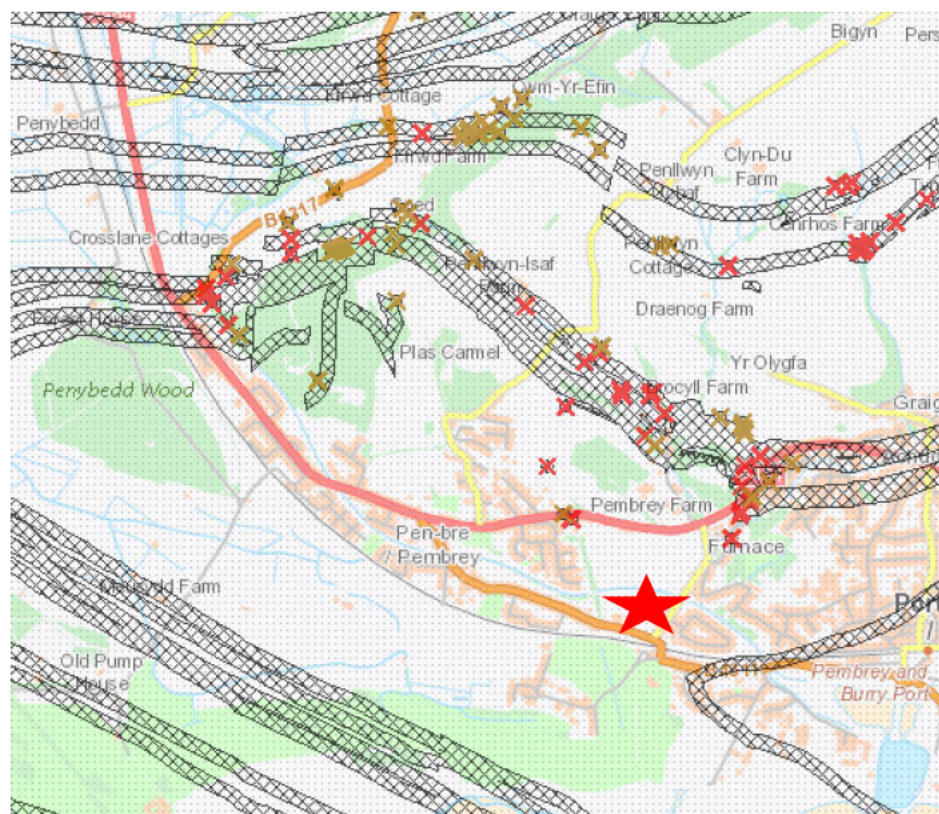


Plan I – Extract from NRW's Flood Map for Planning

- 4.3.2 The above plan extract reveals that the field enclosure lies just outside a designated Flood Zone 2, which is located along the former railway line, and to its north.
- 4.3.3 An examination has also been made of the NRW records relating to potential surface water flooding. Plan I above reveals areas of land in the locality susceptible to such surface water flooding risk. The purple tone denotes the positioning of the Alternative Site and reveals that the site is free from any such constraint.
- 4.3.4 Any development of the Site would involve engineering works to ensure that their sufficient on-site attenuation of surface water and that the existing boundary drainage ditches are improved and have sufficient capacity to receive surface water from existing and proposed developments.

4.3.5 **Past & Present Potential for Ground Contamination and Coal Mining Activity**

The Site comprises a large domestic garden. Due to its greenfield nature and domestic use, the rear field of the Candidate Site has no history of known past ground contamination related constraints. Whilst the locality has historically been the subject of coal mining, the records of The Coal Authority have been examined to ascertain any precise mine entries, addits or seams of shallow coal and mine workings. An extract from The Coal Authority interactive mapping base is reproduced as Plan L, with the site identified by a red star.



Plan L – Extract from Coal Authority's records map for locality

4.3.5 The Coal Authority records reveal that the site is not directly affected by any coal mining legacy, which is concentrated to a seam to the north at the crest of the hillside descending south-eastwards towards Burry Port.

5.0 VIABILITY

- 5.0.1 As part of the preparation of any development plan, it is vital to ensure that allocations within it are both viable and deliverable. To not make efforts to explore both these aspects inherently poses risks that the Plan may be unsound and so in turn fails to meet its own targets or objectives.
- 5.0.2 Although detailed viability appraisals are difficult to prepare at this stage of the Plan's preparation due to the absence of, for example, such things as full engineering details, it is possible to undertake such appraisals at a strategic or in-principle level. The following therefore represents such a process and is fit-for-purpose in providing confidence with regards to both the viability and deliverability of the Candidate Site at this stage. **It should be noted that more detailed analysis at a planning application stage may result in some potential variance.**

5.1 VIABILITY APPRAISAL

- 5.1.1 The following provides an indication of the viability of delivering the proposed 18 units on the Site in question. It is based very much on its greenfield status and uses values and costings previously accepted by the Local Authority through its determination of planning applications and other works. The following appraisal is therefore based on the assumptions set out below in order to provide a residual land value for the scheme.

Costs

- Dwelling construction costs are based on an absolute minimum of £1300 per metre given that bespoke four bed detached houses (140 sq.m.), with a medium grade of internal finishing, and formation of accesses to the highway are likely to be the preferred house type. Three bedroomed semi-detached housing of 85 sq.m. is also proposed
- Estate road carriageway costs of £1200 per linear metre
- Connections for all utilities include water, foul water and electric.
- Developer's Profit based on minimum RICS guidelines (18%)
- Professional Fees include planning application fee, associated professional fees, estate agency fees (1%) and LABC Warranty fee.

Sales Values

- Sale Prices based on LPAs "Affordable Housing" Supplementary Planning Guidance, market research and Welsh Government "Acceptable Cost Guidance" figures where relevant.

5.1.2 Using the above, the following represents a strategic viability appraisal for the proposed 18 units, based on an affordable housing level of 20% which provides for 3 x three-bed dwellinghouses.

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
Four Bed Houses	182,000	8	1,456,000
Three Bed Houses	110,500	10	1,105,000
Estate Road	1200	130	156,000
Utility Connections	5000	18	90,000
Professional Fees	-	-	90,000
Sprinklers	3500	18	63,000
Parks Contribution	2464	18	44,000
Education Contribution	1000	12 children	12,000
Total			3,016,000
Sales			
Four Bed (Open M'kt)	295,000	8	2,360,000
Three Bed (Open M'kt)	245,000	7	1,715,000
Three Bed Affordable	91,000	3	273,000
Total			4,348,000
Developers Profit		Total	783,000
Residual Land Value			549,000

Table 2

5.1.3 Based on the above figures, it is considered that in-principle, the development of the site would be financially viable. The residual land value of £549,000 with a net area of 2.2 acres is consistent with evidence gathered over recent years by the District Valuer in examining residential site transactions within Carmarthenshire. The DV discovered land values on completed and on-going sites to be averaging £245,000 per net residential acre of land, based on 2020 values.

5.2 DELIVERABILITY

5.2.1 In terms of deliverability, it should be firstly noted, as illustrated above, that the site is financially and physically viable, with no environmental, geo-physical or technical constraints prohibiting immediate development. Furthermore, there are no ownership or third-party interests preventing the site's delivery.

5.2.2 In terms of a delivery timescale, with a developer secured, it is envisaged that the site could be capable of being completed within 3 years from the adoption of the replacement Local Development Plan. Burry Port remains an attractive part of the Carmarthen Bay coastline, benefitting from its semi-rural location, but easy access to

Carmarthen and Llanelli by road and rail and the nearby schools, shops, services and community facilities.

- 5.2.3 The presence of modern, detached houses located near the site at Ashburnham Road is testament to this market need and the desire for home buyers to seek out such forms of modest residential development.

6.0 NATIONAL PLANNING POLICY CONSIDERATIONS

- 6.1.1 In the preparation of any development plan, consideration must be given to national planning policy and guidance. At present, this takes the form of *Planning Policy Wales (Edition 11)* and a series of *Technical Advice Notes (TAN)* that deal with a range of topic areas.

- 6.1.2 With regards to residential development, or housing, the overarching requirements and principle guidance set by national policy can be found in the PPW, which reads as follows:

*“Local planning authorities must **ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing** judged against the general objectives and the scale and location of development provided for in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types.”*

- 6.1.3 At present, Carmarthenshire County Council’s housing supply figure is below the required 5-year level and so it is imperative that this is addressed as quickly as possible to avoid further deterioration of communities and the facilities and services they have to offer. The instigation of the formal Review of the LDP will form part of addressing this issue, but only if truly sustainable and deliverable allocations are identified and allocated, to replace many of the failing sites that currently form part of the Authority’s housing and growth strategy for the County, as set out by the current LDP.

- 6.1.4 Dealing specifically with the Site subject of this Report, it is evident that its inclusion within the Replacement LDP would adhere to the requirements of PPW in that it is free from any planning, physical or ownership constraint. In addition, as shown at Section 5 of this Statement, the site is also economically viable in deliverability terms.

6.1.5 PPW provides Authorities with more specific guidance in selecting sites for allocation for residential development and in terms of the Candidate Site, it is considered that it satisfies all relevant criteria, including the following:

- The location of the Site is sustainable in terms of its proximity to a range of community facilities, local services and public transport services.
- The physical and social infrastructure of the settlement is capable of accommodating the proposed development without detriment to any interest.
- The Site is not subject to any physical constraint such as ground instability, ecological interest, flood risk, historic assets or contamination, that would prevent its delivery.
- The development of the site for residential purposes would be compatible with existing adjoining land uses, and its form contained by firm, defensible perimeters.

6.1.6 In summary therefore, the allocation of the Site adheres and supports the objective, principles and requirements of national planning policy.

7.0 CONCLUSION

- 7.1.1 The Site consists of a large, domesticated garden area to a detached house, but lying immediately adjoining an estate of local-authority-built houses, and along Furnace Road which links Gwscwm Road (A484) with Ashburnham Road. The development of the site would mirror development of the eastern flank of the road without the site spilling into the surrounding undeveloped gorse set between Pembrey and Burry Port.
- 7.1.2 The Site forms a logical extension to the existing settlement, being well related to established residential development off its eastern perimeter; and further development at Brynilyd. The Site can be found to be capable of being accessed off the existing public road carriageway, via a new junction which benefits from good visibility onto the Furnace Road. The development of the Candidate Site will mirror the existing modern housing arrangement off Brynilyd.
- 7.1.3 The precise location is such that the strong defensible boundaries of boundary hedgerows and trees, coupled with adjoining former railway cutting, provide a natural and part physical screen from views within the wider landscape. The development of the site would take place against the backdrop of higher ground to the north and a residential estate to the immediate east. Accordingly, the development of the site would remain more akin in character to the built-up form of Burry Port, than open gorse and shrub to the north and west.
- 7.1.4 In addition to the above, the site lies within close proximity and walking distance of the existing community services and local facilities of Pembrey and Burry Port, particularly the post office, public houses and Primary School at Ashburnham Road, which will ensure it makes a positive contribution to both national and local sustainable development objectives.
- 7.1.5 From a wider sense, the Site will also benefit from well served excellent public transport links to the nearby settlements, specifically the towns of Llanelli and Carmarthen, together with other locations within and adjoining the County. In tandem to this, the development of the Site will in turn ensure a deliverable source of future housing for the Local Service Centre in which it lies, which has seen less than half allocated sites being part or fully developed leading to an under supply since the adoption of the current LDP. The development of the Site will help to redress this imbalance and it is strongly suggested that the Authority closely scrutinises those sites currently allocated in the draft LDP in terms of their suitability and deliverability if it is to continue to allocate them. National planning policy however would suggest that in view of the uncertainty in relation to their delivery, such sites should not form part of the replacement LDP. make to the housing land supply.

7.1.6 With the Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable Alternative Site for future housing development.

7.1.7 In view of the above and information provided in this Statement, it is respectfully requested that the Alternative Site in question be allocated for a modest residential development.