



ALTERNATIVE SITE SUPPORTING STATEMENT
FOR
REPLACEMENT CARMARTHENSHIRE LOCAL
DEVELOPMENT PLAN 2018-2033

LAND OFF LLANDEILO ROAD,
LLANDYBIE,
AMMANFORD

On behalf of Mr. W. B. James

Our Ref: 1596.b
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1.0 INTRODUCTION

- 1.1 Mr W. B. James (the Land Owner) have instructed Evans Banks Planning Limited to prepare and submit an Alternative Site Supporting Statement for the inclusion within defined settlement limits of land off Llandeilo Road, Llandybie, Ammanford for the purposes of residential development in the forthcoming 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 Llandybie, 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 a parcel of undeveloped agricultural pasture which is set off the eastern flank of the A483 Llandeilo Road, immediately adjoining a continuous frontage of semi-detached dwellinghouses which are orientated to face that main highway. The field parcel is triangular in shape and extends to a gross area of 0.94 acres (0.38 hectares).
- 2.1.2 The southern perimeter of the field shares a common boundary with residential properties which front the eastern flank of Llandeilo Road, whilst the road frontage of the site is largely open, with a shallow hedgerow across the back of grassed verge. The road frontage extends for some 75 metres and whilst the initial couple of metres comprises a wide grassed verge, the actual grazing field itself lies some two metres in ground level below the passing trunk road. To the rear east of the field lies a public cemetery which extends off the rear of all residential properties fronting Llandeilo Road. The cemetery continues east to adjoin Llandybie Parish Church.
- 2.1.3 Grazing fields extend to the north and north-east and take a similar form to the Alternative Site being semi-improved pasture, which are well-defined with well managed mature tree and hedgerow perimeters and of varying acreages. A continuous line of mature deciduous trees forms the northern boundary and extends eastwards to the banks of the Afon Marlais.
- 2.1.4 The opposite flank of the Llandeilo Road contains a range of individual residential properties set above the road level, exhibiting a arrange of dwelling forms and designs, together with traditional and more established semi-detached houses.
- 2.1.5 The parcel of land is identified in red by Plan A, which illustrates its wider position within the settlement of Llandybie and shows the existing consolidated form of frontage development to the A483 Road. Plan B provides a detailed Ordnance Survey map extract with the site perimeters identified.
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Plan A – wider setting of Llandybie with site highlighted



Plan B – detailed OS Plan of Alternative Site

2.1.6 Photographs of the Alternative Site are reproduced below, showing its current March 2023 condition and form. The Alternative Site is relatively level in form and profile, being set some two metres below adjacent road level. It is well grazed to the extent that no overgrowth vegetation is visible. All mature perimeter trees appear in good health which warrant retention. A wide verge lies off the back edge of highway, and a continuous footway / pavement runs along the entire road length. Plan C is an extract from Google Earth where such physical features are clearly evident.



Plan C – Google Earth view of site (April 2021)



Photo 1 – view of field from Llandeilo Road showing boundary with No 70



Photo 2 – view of eastern fenced perimeter and cemetery beyond



Photo 3 – view north along Llandeilo Road with site set off end of continuous row of properties



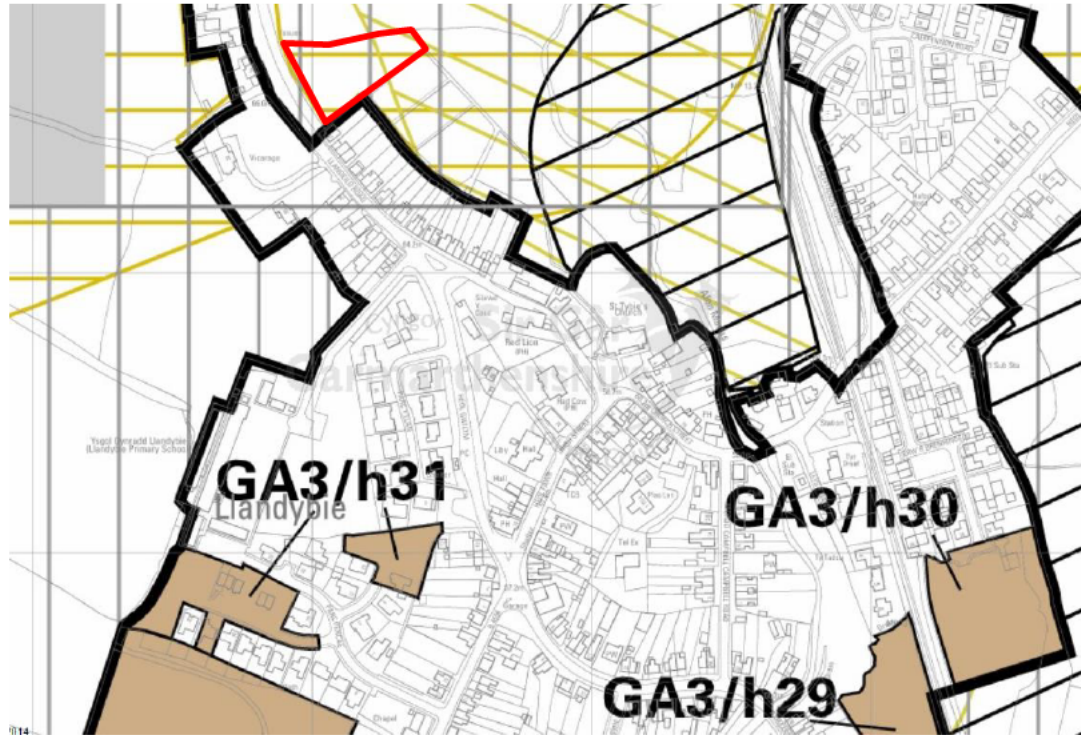
Photo 4 – view to left / south-east at potential access point with A483 road with wide visibility and public pavement along its entire frontage



Photo 5 – view to left / north at potential access point with A483 road with wide visibility extending for well over 100 metres along Trunk Road

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

2.2.1 Under the provisions of the current adopted Carmarthenshire Local Development Plan (2014), the field enclosure adjoins the Settlement Limit of Llandybie. The site is shown edged in red at Plan C below, with the extract for the 2023 published Second Deposit Draft of the LDP shown at Plan D, with the site edged in red. It is immediately apparent that the settlement limits have not changed in the transition to a new draft Plan, with the limits wrapping about the primary school buildings and forming about the access road to encircle the rear garden perimeters of Llandeilo Road properties. However, it is noted that over half the Alternative Site's perimeter is shared with built development, with the open, western perimeter very well defined by established field boundary features.



Plan D – 2014 Adopted LDP Proposals Map for Llandybie



Plan E – Second Deposit Draft (2023) of northern Llandybie

2.2.2 As can be seen, the Alternative Site adjoins and is well related to the draft defined Development Limits of Llandybie. The Alternative Site seeks to develop off a common residential boundary with Llandeilo Road properties, and the backland cemetery, and directly opposite established dwellinghouses at Llandeilo Road.

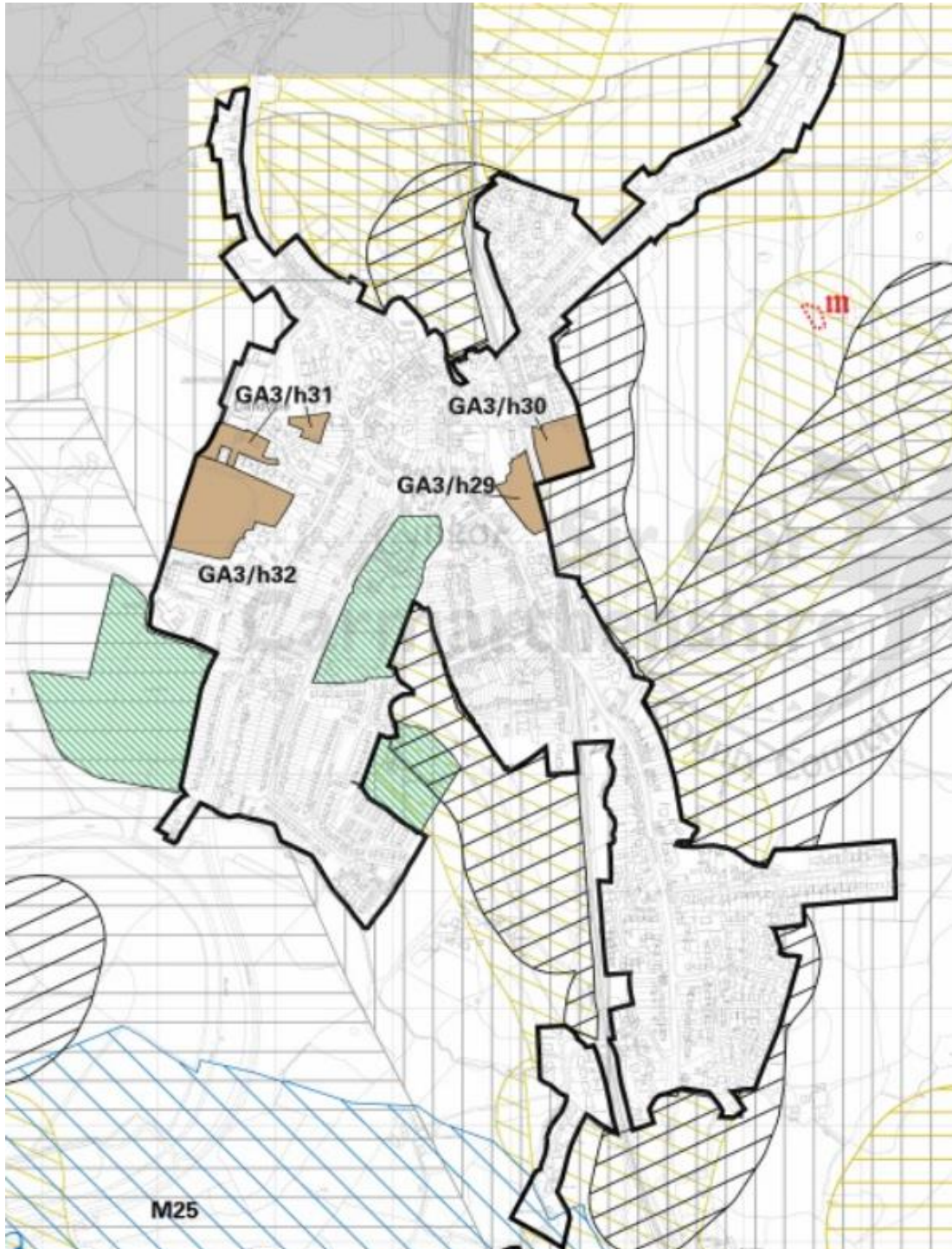
2.2.3 Llandybie has good accessibility to the nearby towns of Llandeilo to the north and Ammanford to the south, and its links via the A483 Trunk Road to the M4 at Pont Abraham, and north to converge with the A40 north of Llandeilo.

2.2.4 In terms of the Alternative Site, it is located within easy walking distance of all community facilities and local services present provided within the Llandybie settlement. Access to further facilities in the town of Ammanford to the south can be gained by regular bus services where stops are located near the site frontage upon the A483 road.

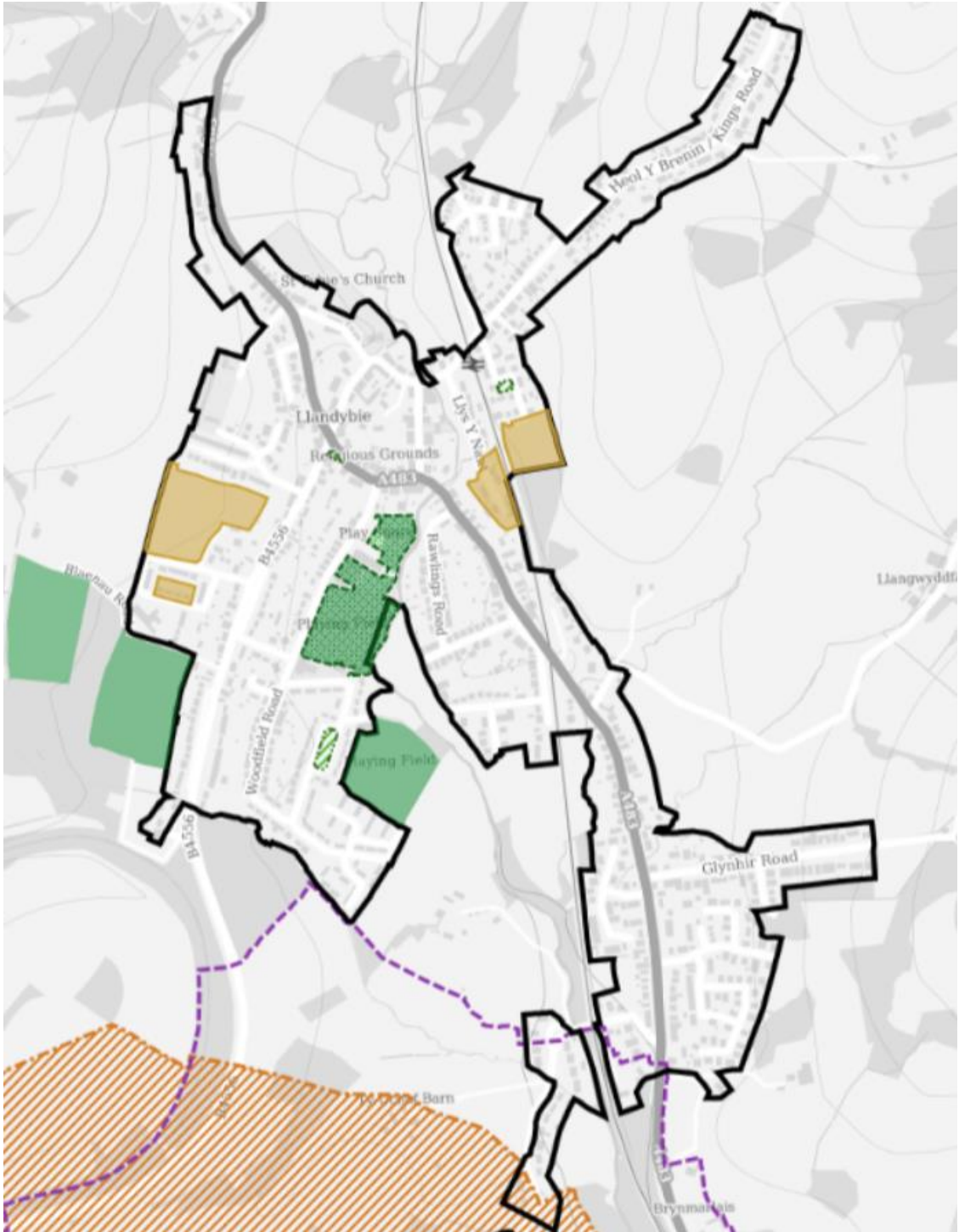
2.2.5 **Transition from Adopted Local Development Plan (2006-21) – Allocation Status**

In terms of planned growth, the proposed Alternative Site at Llandybie is located within the identified Ammanford / Cross Hands Growth Area within the current LDP, adopted in December 2014. Llandybie is regarded by the Council as sustainable settlement given its accommodating of a range of services providing a modest degree of sustainability to the local community.

2.2.6 A number of the housing allocations were presented within the LDP but have yet to be delivered after 8 years since the Plan's adoption. Plan F below provides an extract from the 2014 Proposals Map for Llandybie. In the formulation of a new Plan, the Council have appeared to repeat the from a total of four sites from the adopted plan into the new Replacement LDP. Plan G illustrates the Second Draft Plan.



Plan F – 2014 LDP Extract for Llandybie illustrating four residential allocations



Plan G – Second Draft Plan for Llandybie with similar residential allocations

2.2.7 The net result is that despite Llandybie continuing to have good provision of community facilities, local services and public transport connections to Llandeilo and Ammanford, its ability to grow and capitalised on these sustainable attributes has been prevented through a lack of delivery of existing allocations. More deliverable residential opportunities are required. The deliverability of the remainder of the longstanding allocations are clearly in doubt, so, in order to re-address this deficit in provision and capitalise on the sustainability of the Sustainable Community, more deliverable residential allocations are required.

2.2.8 **Second Deposit Draft LDP (February 2023)**

The Council published a Deposit Draft in February 2023, which is now subject of public consultation. Within the Second Deposit Draft, four sites are allocated for housing provision within Llandybie, as was also included within the settlement limits in the 2014 adopted Plan.

Llandybie			
PrC3/h19	Land off Llys y Nant	9	Commuted Sum Contribution
PrC3/h20	Land north of Maespiode	45	5.4
PrC3/h21	*Maespiode	8	8
PrC3/h37	*Clos Felingoad	24	24

Table 1 – 2023 Second Deposit Draft Allocation

2.2.9 It is noted that Llys-y-Nant is virtually completed, as is Land north of Maespiode with its 8 units. Clos Felingoad is being developed by a local housing association, after full planning permission has been granted in 2022.

The large site at Maespiode for 45 units (PrC3/h20) remains undeveloped despite being the subject of a full planning permission, submitted in March 2022 (PL/03750). It is noted that the application has yet to be determined.

2.2.10 The Council's Housing Growth Strategy targets Ammanford as the focal town in the Ammanford / Cross Hands Principal Growth Cluster. Llandybie forms part of the principal service centre centring upon the Ammanford Cluster as defined within the Second draft LDP. The new Draft Proposals Map reveals that the Council have allocated a total of 8 sites at Ammanford as shown below.

Ammanford (inc Betws and Penybanc)		
PrC3/h1	Land at r/o No 16-20 & 24-30 Betws Road	9
PrC3/h2	Former Petrol Station, Wind Street	6
PrC3/h3	*Land at Gwynfryn Fawr	28
PrC3/h4	Tirychen Farm	150
PrC3/h5	Yr Hen Felin, Pontamman Road	6
PrC3/h6	Land Adjoining Maes Ifan, Maesquarre Road	18
PrC3/h33	Llys Dolgader	9
PrC3/h36	Betws Colliery	66

Table 2 – Ammanford draft allocations under Policy HOM1

2.2.11 The above eight allocated sites proposed for Ammanford reveal a combined total of 292 units, however upon analysis it is clear Wind Street, Llys Dolgader, Gwynfryn and Yr Hen Felin have already been constructed, totalling 49 dwellings.

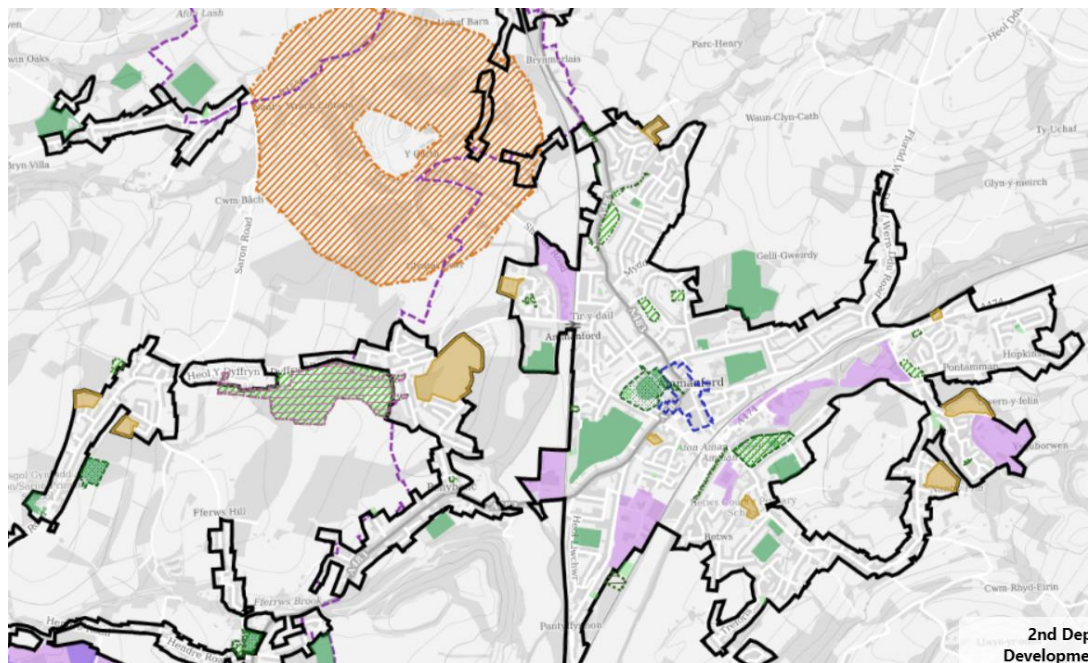
2.2.12 Of the other four Ammanford allocations, it is immediately noteworthy that they are predominately “roll-overs” from earlier Development Plans with those sites showing no commitment whatsoever to commit to the implementation of a planning application. We would comment on the two largest of those sites as follows:

Site PrC3/h4 - Tirychen Farm, Dyffryn Road, Penybanc - for 150 units.

Planning permission was last granted in 2014 for 289 dwellings, under Application E/21633. However, that permission was **only granted in outline form**. It subsequently lapsed, and the landowners sought to vary conditions upon that permission to extend the validity of the outline permission. That Variation of Condition application was finally approved in October 2019, under Application E/38686.

The recently approved Variation of Condition permission does little to display any real progress in the deliverability of the site. It merely amounts to the landowners seeking to continue to benefit from an outline planning permission at the site. Full planning permission was granted as far back as 1992 (D6/19332), which subsequently lapsed. The Land continued to be allocated within the Dinefwr Local Plan (1996), and subsequent Carmarthenshire Unitary Development Plan (2003). No progress was made in bringing the site forward, and yet it was allocated within the Local Development Plan in 2014. Consequently, **thirty years of Development Plan allocations** have elapsed without any signs of delivery of this site. Clearly, there is no historic demand for a site of this scale in this part of the Ammanford area. More physically challenging sites, such as the re-development of the Betws Colliery site at Betws and Cae Pound at Cross Hands West Tip have come forward long before Tirychen, and yet still the Council is prepared to allocate the site once again in a new Development Plan.

The decision to retain Tirychen Farm after a period of 30 years within the LDP is shown to be inconsistent, as does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability.



Plan H – wider view of Ammanford draft Proposals Map

2.2.13 Site Prc3/H36 - Betws Colliery – for 66 units

Outline planning permission was first granted for residential development on the allocation as far back as **2005** (Application E/09584), with reserved matters being granted in 2011 (Application E/24724). A Non-Material Amendment (Application PL/04568) has been granted in September 2022 for the 'Removal of chimneys and raising the height of window sills'.

The site was allocated in the *Carmarthenshire Local Development Plan (2014)* as part of a larger allocation (GA3/h9), and Allocation PDB27 of the *Carmarthenshire Unitary Development Plan (2006)*, which included the land south of Ffordd y Glowyr, which has been developed.

However, the northern element continues to be allocated for 66 units in the Second Draft LDP. This is despite having almost 20 years of support for the principle of residential development at the historic allocation from the Council, with **not a single housing unit has been delivered to date.**

2.2.14 The above analysis serves to demonstrate that the Council's strategy for housing growth in the Ammanford Cluster is questionable and open to considerable criticism in rolling over allocations from the last LDP period without any realistic prospect of those allocations being brought forward for development and delivery.

2.3 Settlement Facilities

2.3.1 The Alternative Site lies just off the A483 Llandeilo to Ammanford main highway. Public bus stops are located only 2-3 minutes' walk from the Alternative Site at Llandeilo Road to Llandybie Square. Main public bus services call at these stops, particularly:

X13 service (Llandeilo to Swansea) which calls at Llandeilo Road en-route to Ammanford, Pontardulais, Penllergaer, Fforestfach and Swansea City Centre.

Bus service 103 operates between Llandeilo and Ammanford.

Service 165 also runs between Ammanford and Cross Hands.

2.3.2 The Alternative Site lies less than a three-minutes' walk from the primary school. A selection of small convenience shops, supermarket, public houses and community facilities are located at High Street, and upon its junction with Llandeilo Road.

2.3.3 Llandeilo and Ammanford town centres are located a short 10- and 5-minutes' drive / bus journey away respectively with its associated comparison shops, high street banks, public houses/cafes, offices, industrial estates, library, and leisure/recreation facilities.

2.3.4 Llandybie lies upon the Heart of Wales Rail Line, and the station can be accessed at Heol-y-Brenin, being less than a ten minutes' walk from the Alternative site.

3.0 THE PROPOSAL

3.0.1 This Statement is accompanied by an indicative layout for a potential residential scheme that could be development on the site. It should be emphasised that the accompanying layout is for illustrative purposes only, and that other design solutions for the site could be reached. Notwithstanding this, the accompanying layout drawing has taken into account all potential assets and constraints of the site and demonstrates that it can deliver **14 units** in a deliverable and sustainable manner.

3.1 DEVELOPMENT OVERVIEW

3.1.1 It is proposed that the Alternative Site be allocated in the forthcoming Replacement LDP for the purposes of a combined total of 14 residential units. As detailed above, the accompanying illustrative layout demonstrates that the site can accommodate this number in a deliverable and sustainable manner. Plan I illustrates the indicative site layout for the Alternative Site, as edged in red, extending off School Road, with a new access junction set at a mid-point in the site frontage and descending into the site. Proposed frontage properties could face the main road, but be served off rear parking courtyards accessed off the internal estate road.



Plan I – Site Layout

- 3.1.2 As illustrated above, the site is capable of accommodating detached, linked and semi-detached houses to replicate and being reflective to the existing form of new, modern development to the east at Llys-y-Nant and south at Maespiode.
- 3.1.3 With regards to access, it is proposed that the Alternative Site would be served by improvements and widening of the existing access road, and onto a junction with the A483 highway. Vehicle speeds are consistent with the 20mph speed limit, and thus visibility splays of 2.4m x 45m to the south and 90 metres to the north can easily be achieved where the junction adjoins the A483 road. **Photographs 4 and 5 above illustrate that visibility splays to those distances can already be achieved in both directions. The Applicant also owns the adjoining northern field enclosure and is able to control the extent of the northern visibility splay through reduction in ground vegetation and having no man-made obstructions in place.**
- 3.1.4 The Alternative Site proposals can fully retain all existing boundary treatments being established tree perimeter and hedgerows to the northern perimeter, and about the existing houses at Llandeilo Road.

3.2 INFRASTRUCTURE CONSIDERATIONS

- 3.2.1 Development of the Alternative Site for residential units would be served by mains water, gas, public sewer and electricity connections.
- 3.2.2 A new estate road is proposed within the development. This will be equipped with roadside gullies and drainage which aid discharge run-off from the carriageway. The drainage of the proposed access road to the site could eventually connect to the River Marlais, after passing through appropriate oil interceptors.
- 3.2.3 The Alternative Site comprises of agricultural pasture. 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 soft engineered in the form of attenuations basins and / or swales, thus adhering to the principle of Sustainable Urban Drainage Systems (SUDS).

4.0 ENVIRONMENTAL CONSIDERATIONS

4.1 ECOLOGICAL ATTRIBUTES

4.1.1 The Alternative 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 J below provides an extract of those records applied to the Llandybie locality. The red star denotes the position of the Alternative Site.



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

4.1.2 The records reveal that the Alternative Site does not include or adjoin any national or local nature conservation designation. The Cernydd Carmel SSSI lies over one kilometre north-west of the site, and thus at a very safe distance as to not be affected by any development proposals at the site.

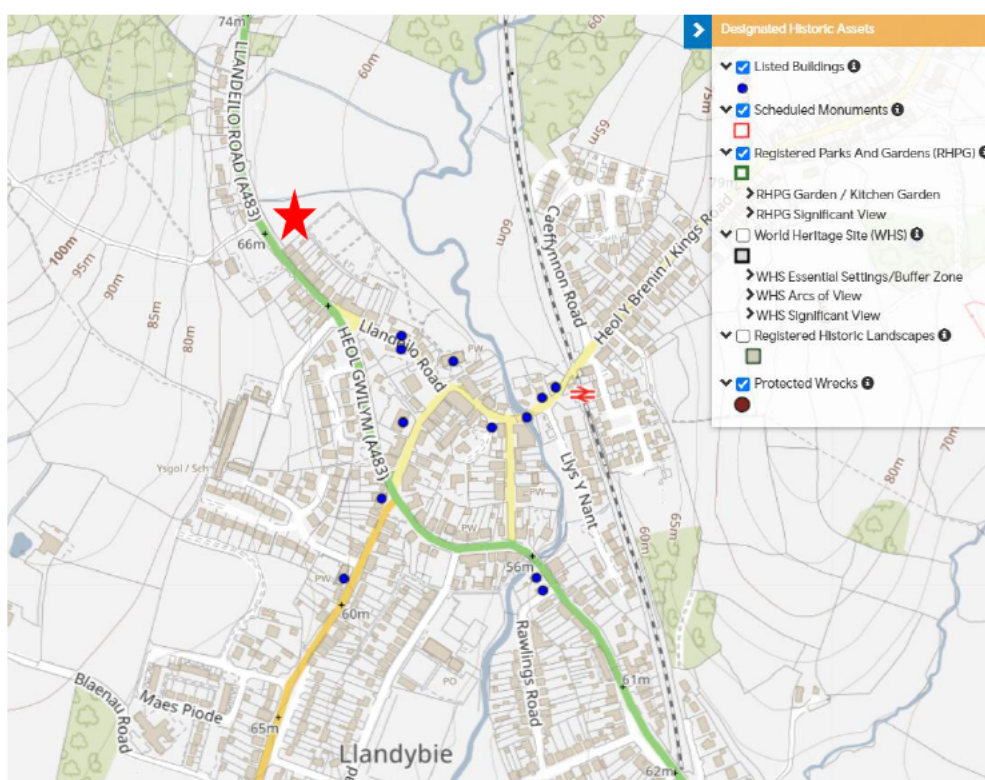
4.1.3 Any biodiversity assets that may be present or adjoining the Alternative Site have been given full consideration with regards to exploring its potential for residential

development. This has included the proposed retention and management of existing boundary trees. It is envisaged that the entirety of mature tree and hedgerow lines could be retained and managed further for uninterrupted biodiversity gain.

4.1.4 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 upon them.

4.2 HISTORICAL ASSETS

4.2.1 The Alternative 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 Llandybie is reproduced below as Plan K. The red star denotes the position of the Alternative Site.



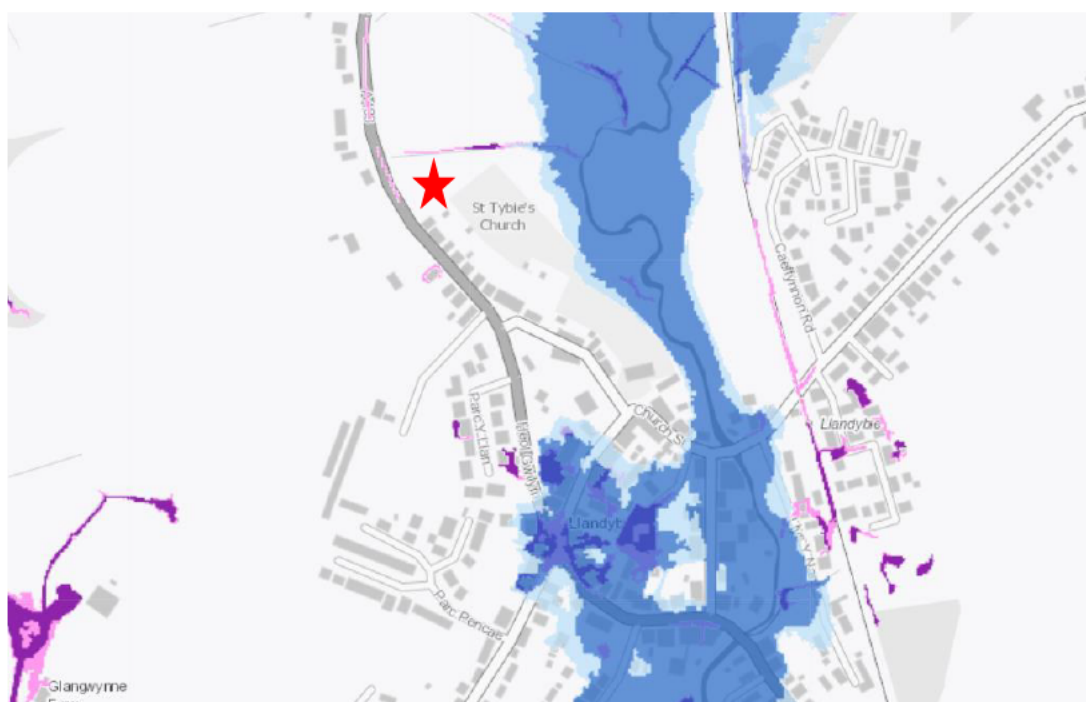
Plan K – Extract from Cof Cymru Historic Assets website

4.2.2 The extract reveals there to be no Scheduled Ancient Monuments in the locality, whilst Listed Buildings are concentrated south of the site off Llandeilo Road, where it merges with High Street.

4.3 ENVIRONMENTAL CONSTRAINTS

Potential for Risk from Flooding

4.3.1 The Alternative Site has been assessed against the Flood Map for Planning, prepared by Natural Resources Wales, and as referred to within the Welsh Government's revised / draft "Technical Advice Note 15: Development and Flood Risk". An extract from the Flood Map for Planning is reproduced below as Plan L, with the site denoted by a red star.



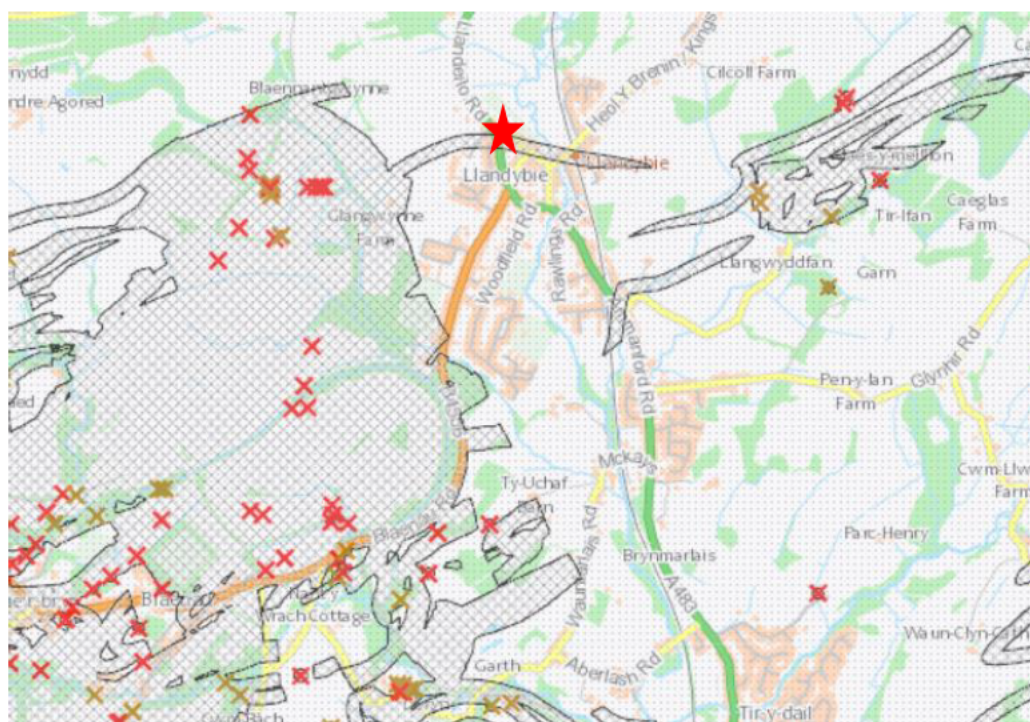
Plan L – Extract from NRW's Flood Map for Planning

4.3.2 The above plan extract reveals that no part of the Alternative Site lies within the designated flood zone of the River Marlais and Nant Gwinau, and thus the potential development of the site is not at risk from fluvial flooding.

4.3.3 An examination has also been made of NRW records relating to potential surface water flooding, as shown by purple tone in the above plan. The red star again denotes the positioning of the Alternative Site and reveals there to be no potential for pooling of surface water upon the site.

Past and Present Potential for Ground Contamination and Coal Mining Activity

4.3.4 The Alternative Site comprises a modest former agricultural field. Due to its greenfield nature and agricultural use, the field has no history of known past ground contamination related constraints.



Plan M – Coal Authority Map indicating former mining legacy

4.3.5 The records of The Coal Authority have been examined and reveal the history of coal mining in this part of the County. Whilst there are underlying seams of coal under Llandeilo Road, there are no mine entries near the site, as indicated above at Plan M by a red star.

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 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

5.1 VIABILITY APPRAISAL

5.1.1 The following provides an indication of the viability of delivering the proposed 14 units on the Alternative 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 (160 sq.m.) 3-bed detached at 120 sqm., 2 bed linked houses at 70 sq.m., and three-bed semi-detached houses (90 sq.m.), with a medium grade of internal finishing.
- Estate road carriageway costs are placed at £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 14 units, based on an affordable housing level being a 10% contribution of the total number of dwellinghouses proposed.

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
Four Bed Houses	208,000	2	416,000
Three Bed Houses	156,000	2	312,000
Three Bed Semi-detached	117,000	4	468,000
Two Bed Linked	91,000	6	546,000
Road Construction	1200	70	84,000
Utility Connections	5000	14	70,000
Professional Fees	-	-	95,000
Sprinklers	3500	14	49,000
Parks and Education	5000	14	70,000
Contribution			
Total			2,110,000
Sales			
Four Bed (Open M'kt)	295,000	2	590,000
Three Bed (Open M't)	240,000	2	480,000
Three Bed semi (Open	225,000	4	900,000
Two Bed (Open M'kt)	185,000	4	740,000
Two Bed (Affordable)	78,000	2	156,000
Total Sales			2,866,000
Developers Profit		Total	516,000
Residual Land Value			240,000

Table 3

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 £240,000 for a site consisting of 14 dwellings over a 0.94-acre sized site 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 2 years from the adoption of the Replacement Local Development Plan. Llandeilo Road remains an attractive part of Llandybie given its panoramic views over surrounding countryside, benefitting from its semi-rural location, but easy access to Llandeilo and Ammanford by road and the nearby schools, shops, services and community facilities.

6.0 NATIONAL PLANNING POLICY CONSIDERATIONS

- 6.1 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* and a series of *Technical Advice Notes* (TAN) that deal with a variety of topic areas.
- 6.2 With regards to residential development, or housing, the overarching requirements and principal guidance set by national policy can be found at 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.”*

- 6.3 At present, Carmarthenshire County Council's housing supply figure is below the required 5-year level therefore, 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.
- 6.4 Dealing specifically with the Alternative 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 in Section 5 of this statement, the site is also economically viable in deliverability terms.

7.0 CONCLUSION

- 7.1 The Alternative Site is very modest in overall size, with established dwellinghouses located off its immediate southern perimeter, and located directly opposite off Llandeilo Road. The enclosure tends to be well screened from public view by virtue of high perimeter trees which shelter the site along the northern perimeter, and add a sense of semi-rural character to the scheme.
- 7.2 The Site lies within close proximity and walking distance to the existing community and local services of Llandybie which will ensure it makes a positive contribution to both national and local sustainable development objectives.
- 7.3 From a wider sense, the Site will also benefit from well served excellent public transport links to the nearby settlements, specifically the towns of Llandeilo and Ammanford, 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 Sustainable Community in which it lies, which has seen both allocated sites 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 recognises the suitability and deliverability of modest

sites if it is to continue to realise the contribution villages such as Llandybie make to the housing land supply.

- 7.4 With the Alternative Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership constraints, its delivery if included within settlement limits is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable alternative for future housing development.
- 7.5 In view of the above and the information provided within this Statement, it is respectfully requested that the Alternative Site in question be included within limits for a modestly sized residential development.