



26th June 2026
Our Ref: 23.8004

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Dear Sir/Madam

**Carmarthenshire Revised Local Development Plan (RLDP) 2018 -2033
Schedule of Matters Arising Changes (MACs)
Representation on behalf of Barratt Redrow regarding Land off Heol-y-Mynydd, Bryn
(PrC2/(v))**

We are pleased to submit this representation on behalf of our client, Barratt Redrow (Hereinafter referred to as BR) in response to the current consultation on the Carmarthenshire County Council (CCC) Schedule of Matters Arising Changes.

The purpose of this submission is to provide constructive comments to support the overall soundness of the emerging Revised Local Development Plan (RLDP) 2018-2033 and emphasis the important role 'Land off Heol-y-Mynydd, Bryn' (Ref PrC2/(v)) has in helping meet local housing need over the proposed plan period.

Whilst BR wholly support the principle of proposed allocation at Heol y Mynydd, Bryn, it is noted that the Council has identified only the eastern portion of the site for 80 dwellings. Given the context we strongly believe there is sufficient evidence to justify allocating the site in its entirety for up to 160 dwellings. This approach shall provide greater certainty in ensuring the emerging RLDP is able to effectively meet Carmarthenshire' housing needs over the emerging plan period and contribute towards achieving a more consistent supply of homes to account for any potential slippage elsewhere.

Executive Summary

- BR supports the Council's commitment to increasing housing delivery but considers that the overall housing requirement and flexibility allowance should be increased to better reflect the latest demographic evidence and provide greater resilience against potential delivery shortfalls.
- Concerns remain regarding the reliance placed on committed sites, particularly where outline permissions have lapsed or where new planning, drainage, biodiversity and



infrastructure requirements may affect deliverability.

- The allocation at Land off Heol y Mynydd, Bryn is strongly supported; however, allocating the full site for up to 160 dwellings would maximise the use of a sustainable and deliverable location, strengthen the housing trajectory and provide greater certainty in meeting local housing needs.
- BR supports the proposed policy changes relating to water quality, nutrient neutrality, placemaking, open space and active travel, provided they are supported by clear guidance, applied proportionately and retain sufficient flexibility to facilitate the timely delivery of much-needed housing.

For completeness we have set out our full response to the Schedule of Matters Arising Changes below. Although this should be read in conjunction with all previously submitted representations to the Additional Sites consultation, EiP Hearing Statements and Deposit Plan.

Strategic Policy – SP4: A Sustainable Approach to Providing New Homes

Strategic Policy SP4 sets out the Council's overall housing requirement of 8,822 homes for the plan period (2018-2033), and to achieve it makes provision for up to 9,814 new homes.

Whilst BR fully support the principle of increasing the Council's overall housing target. It is important to note that in reality the proposed increase only equates to a provision of 110no. new dwellings over the emerging plan period, and therefore is minimal in nature.

Although we appreciate that in turn the proposed amendments lead to an increase in CCC's flexible allowance bring it up to circa 11.24%. BR maintain there are sufficient circumstances to warrant increasing both the proposed housing figure and associated flexible allowance further in order to provide greater certainty that emerging RLDP is capable of meet housing across Carmarthenshire. This is particular important to ensure sufficient flexibility is built into the plan itself from the outset. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

In terms of the proposed flexibility allowance, whilst we acknowledge the latest figure of 11.24% technically exceeds the 10% threshold commonly referenced in the plan-making process. Paragraph 5.59 of the DPM clearly states that *"The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced"*.

Having reviewed the technical evidence base we understand the current housing figures have been informed by the trends set out within the 2018-based demographic projections. Although we appreciate that more recent data has emerged following consultation on the additional sites towards the end of last year. From a procedural perspective it is important to recognise that the 2018-based projections have now been formally superseded by more recent findings which includes Welsh Government's 2022-Based Local authority household projections (Dated 20th



November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

Given the emerging RLDP is at an advanced stage of the plan-making process we would not necessarily expect the Council to formally reassess its housing need position. However, in the interests of soundness, we strongly believe the Council's housing target, and by virtue of which flexible allowance, should be uplifted to better align with the latest demographic evidence available. Most notably this includes the fact that in the case of Carmarthenshire, from mid-2022 to mid-2032 the overall number of households is projected to increase by around 7%, which is broadly in line with the national average.

In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone.

The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are better reflected within the emerging RLDP's overall housing requirement. This is fundamental to ensure the emerging RLDP is locally specific and thus supported by a robust, proportionate and credible evidence to demonstrate compliance with Test 2 of the DPM.

Policy HOM1: Housing Allocations

Whilst BR wholly support the principle of proposed allocation at Heol y Mynydd, Bryn, it is noted that the Council has identified only the eastern portion of the site for 80 dwellings. Given the context we strongly believe there is sufficient evidence to justify allocating the site in its entirety for up to 160 dwellings.

Site Allocation PrC2/(v)

BR appreciate the inclusion of Land at Heol y Mynydd, Bryn as a housing allocation within the Revised Carmarthenshire Local Development Plan for 80 units. However, it is still considered that the site is able to accommodate further development in order to maximise the opportunities to deliver homes in a highly sustainable location which in turn forms part of the Swansea Bay & Llanelli National Growth Area in line with Future Wales.

By virtue of the above Barratt Redrow suggest that the draft LDP policy for Heol y Mynydd, Bryn (PrC2/(v)) should be increased to 160 homes for the following reasons:



1. It would make efficient use of the site in accordance with national policy;
2. The site is being promoted by a national housebuilder that is committed to delivering homes in the short-medium term – increasing the quantum of development on this allocation would ensure the draft RLDP delivers sufficient homes throughout the first part of the Plan period and maintains a more consistent supply of dwellings over the entire plan period.
3. The site falls within Cluster 2: Llanelli and Southern Gwendraeth Area which has been identified as a 'national growth area' within Future Wales. To this end, with the potential for up to 160 dwellings to be delivered, this site is genuinely deliverable and can contribute to the identified housing need within the locality.

Ultimately the proposed allocation of the site in its entirety would provide greater certainty in ensuring the emerging RLDP is able to effectively meet local housing need over the emerging plan period. Whilst also supporting a more consistent supply of homes in accordance with the Council's trajectory with sufficient contingency built-in to account for any unforeseen slippages elsewhere.

For completeness, if the Inspectors were minded to recommend allocating Heol y Mynydd for the full 160 homes and retaining all other proposed site allocations as currently drafted, this would only result in an increase to 1,072 homes (as opposed to 992 set out in MAC document) equating to a housing supply of 9,894 homes. With regards to the proposed flexible allowance such changes would result in a figure of 12.15% compared to 11.24% as currently mentioned within the RLDP MAC version.

Although we appreciate these amendments are relatively minor in terms of plan-making they remain in keeping with the context of Carmarthenshire whilst providing greater certainty that the emerging plan is capable of meeting the identified housing need over the plan period.

Housing Supply Components

BR wholly support the principle of proposed allocation at Heol y Mynydd, Bryn. Furthermore, we also support the proposed trajectory for the site as set out within Appendix 7 of the RLDP and remain fully committed to facilitating delivery of the site early on in the plan period which includes 40 dwellings in 2027/28 and 40 dwellings in 2028/29.

Land off Heol y Mynydd provides an opportunity to assist the Council in meeting its identified housing requirements through the provision of much-needed new homes in a highly sustainable location. The site benefits from excellent accessibility to existing services, facilities and transport connections, thereby supporting the creation of a well-connected community and reducing reliance on private car travel. Importantly, it also benefits from having a national housebuilder onboard with a proven track record of delivering high-quality residential developments across Carmarthenshire. This provides confidence that the entire site at Heol y Mynydd can be brought forward efficiently and within the plan period, ensuring that it makes a meaningful contribution towards meeting the Council's housing needs whilst remaining in keeping with the RLDP's growth strategy.



Paragraph 11.79 of the MAC Schedule Version explains that in order to meet the Carmarthenshire's housing need, the proposed plan incorporates a number of housing supply components which includes the following:

Policy HOM1 allocations	2685
Commitments (Remaining)	2750
Large Windfall (Remaining)	522
Small Windfall (Remaining)	840
Completions:	
Commitments (Completed)	2269
Large Windfall (Completed)	84
Small Windfall (Completed)	664
Total	9814

Figure 1. Extract of CCC's Housing Supply Components as part Para 11.79 of the RLDP

Whilst we note that Paragraph 11.80 suggests the largest component of the Council's housing supply will be sites allocated for residential development. As shown above this position has since changed with the largest contingency now set to accounted for as commitments (either completed or remaining).

Having reviewed the evidence base further, and comparing it to the information originally submitted as part of the 2nd Deposit Plan, we understand the overall number of dwellings set to be delivered on proposed allocations under Policy HOM1 has decreased significantly by approx. 4,139 dwellings (i.e. 6,824 units within the 2nd Deposit Plan down to 2,685 units within the Scheduled MAC version).

Table 1. Comparison of Proposed Residential Allocations under Policy HOM1 (2nd Deposit Plan and MAC Version)

	Policy HOM1 - Proposed Site Allocations	
	2 nd Deposit RLDP	MAC Version
Cluster 1	1,690 dwellings	825 dwellings
Cluster 2	2,840 dwellings	789 dwellings
Cluster 3	1,267 dwellings	517 dwellings
Cluster 4	218 dwellings	172 dwellings
Cluster 5	162 dwellings	67 dwellings
Cluster 6	647 dwellings	315 dwellings
Total Allocated	6,824 dwellings	2,685 dwellings



From a procedural standpoint we note that the majority of these sites appear to have been transferred into the Council's landbank as commitments. Whilst we appreciate that some may well have secured planning consent within the intervening period and thus logically have been reassigned. We query the overall feasibility of 4,139 dwellings being consented over the past two years, since the 2nd Deposit Plan was originally submitted to PEDW for examination in June 2024. Furthermore, the scale of such changes at this advanced stage of the plan-making process raises questions as to why those sites were not previously accounted for as commitments, if indeed they did benefit from planning consent at that particular point in time.

Appendix 7 of the RLDP sets out the Council's proposed housing trajectory relating to both site allocations and commitments. In terms of the latter the total number of commitments is identified as being 5,019 dwellings, which in turn has been further sub-divided into 2,269 units already completed and 2,750 remaining over the plan period. Of those remaining, having reviewed the respective evidence bases we understand that 26% of the Council's committed sites only benefit from outline consent, which equates to circa 1,322 dwellings.

Furthermore, according to information on the Council's planning register 86% of those outline permissions have since time expired/lapsed and by virtue of which will require new planning applications to be submitted to facilitate any future development (please refer to Appendix 1 for further details of assessment). This inevitably raises uncertainty regarding delivery of up to 1,145 dwellings which arguably do not meet the Council's own definition of a 'commitment' (as set out within Chapter 13 – Glossary of the RLDP) and thus should not be relied upon in that respect.

In addition to the above it is important to recognise the fact that even if new application were to come forward on these sites new legislative requirements have since come into force including Sustainable Drainage Systems (SuDS)/ SuDS Approval Body (SAB), Net Benefit for Biodiversity (NBB) and additional green infrastructure provision in line with Chapter 6 of PPW12. Constraints imposed by these new policy requirements will inevitably reduce the amount of developable land available and in turn the overall number of dwellings physically able to be accommodated on site.

BR therefore maintain that the numbers for dwellings associated with the Council's proposed commitments need to be revisited to more accurately reflect their current status with regards to planning consent and in turn the overall quantum of development actually able to be achieved on site.

Where necessary, this shall enable new sites which have been assessed in the context of the recent design, biodiversity and drainage requirements (such as the entire site at Land off Heol y Mynydd, Bryn) to come forward in order to account for the shortfall, thereby ensuring the RLDP is capable of effectively meeting local housing needs over the proposed plan period. The benefits of which shall also demonstrate the emerging plan is underpinned by a robust, proportionate and credible evidence base to accord with the requirements of Tests 2 & 3 of the Development Plan Manual for Wales (DPM) (3rd edition).

According to the Council's housing trajectory (Appendix 7 of the RLDP) many of the sites which have extant consents are expected to start delivering homes within the next 12 months (i.e.



2026/27 and 2027/28). This obviously raises concerns given the timescales involved with preparation, submission and determination of a planning application. Along with compliance with statutory Pre-Application Consultation (PAC) requirements, discharge of planning conditions, approval through the Sustainable Drainage Approval Body (SAB) process, and completion of any associated infrastructure agreements. Each of these stages can be time-consuming and on occasions lead to significant delays in housing delivery, especially earlier on during the plan period.

In light of the above BR maintain that there is sufficient evidence to justify allocating Land off Heol y Mynydd, Bryn in its entirety for up to 160 dwellings. This approach will provide greater certainty in ensuring the emerging RLDP is able to effectively meet local housing need over the emerging plan period and the proposed housing trajectory whilst also accounting for any potential slippage elsewhere.

Strategic Policy – SP3: Sustainable Distribution – Settlement Framework

Policy SD1: Development Limits

As part of the Matter Arising Changes (MACs), it is understood that an additional paragraph has been inserted explaining that:

"Development limits are a key mechanism for helping to manage future growth by defining the area within which development would normally be permitted, subject to material planning considerations. The development limits have been applied to the Principal Centres, Service Centres and Sustainable Villages as defined in Strategic Policy SP3: Sustainable Distribution – Settlement Framework."

Barratt Redrow supports the principle of amending the settlement boundary but maintain that the proposed changes should be further revised to ensure a sustainable pattern of growth is achieved at Bryn. In turn this approach will better contribute towards meeting identified housing needs, including the provision of homes for local people in an accessible and sustainable location. For the purposes of soundness, BR strongly believe that the proposed allocation at Land off Heol y Mynydd, Bryn should be extended to account for the site in its entirety. This would require a corresponding amendment to the development limits to include the full 5.4 hectares of land under Barratt Redrow's control, thereby avoiding any potential reliance upon the adjoining parcel of undeliverable white land to contribute to future housing supply.

By contrast Barratt Redrow notes that, as a consequence of the revised development limits, an area of unallocated "white land" immediately to the south of the proposed allocation (also accessed from Heol y Mynydd, Bryn) would, by default, be incorporated within the settlement boundary. In procedural terms, the inclusion of this land within the development limits creates the potential for it to come forward as a windfall site during the plan period. However, the land is understood to be landlocked, unregistered in terms of ownership and, as such, cannot presently be considered deliverable or developable.

Barratt Redrow therefore requests that the additional land, directly to the west of the allocation, which has continuously been promoted for residential development should be incorporated



within the allocation boundary. The land is available, within the control of the developer, and capable of being delivered during the early years of the Plan period. Moreover, its inclusion would provide greater certainty that future residential development in this location will be delivered in a more comprehensively, coherent and ultimately sustainable manner. Thereby avoiding piecemeal or speculative proposals coming forward on adjacent land. This approach would be more closely aligned with national policy and in particular WG's principles of good placemaking in order to contribute towards achieving sustainable development in accordance with Test 2 of the DPM.



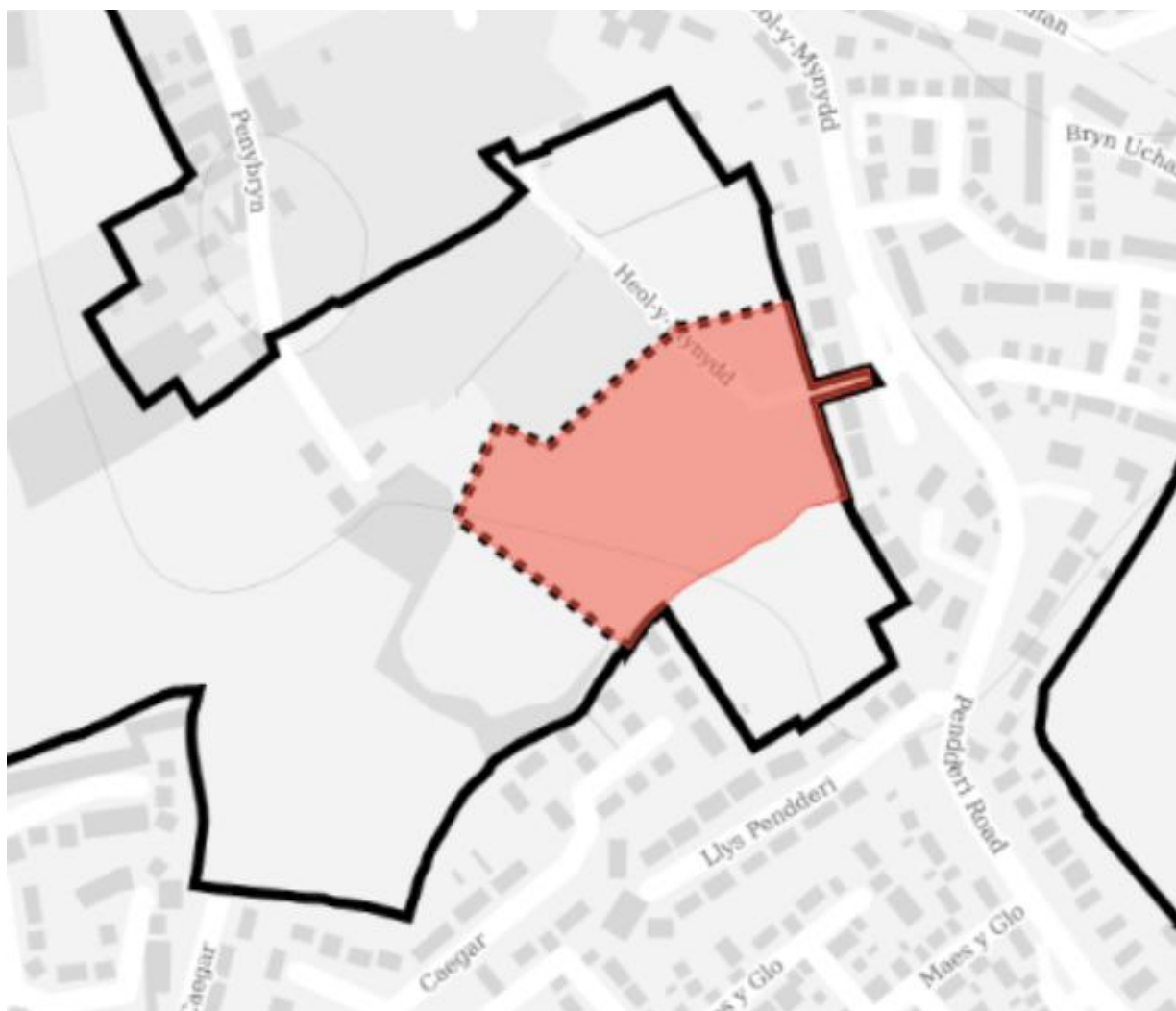


Figure 2: Extract from MAC – Map Based Changes

In addition to the above, there appears to be some technical inconsistencies relating to site reference numbers and the physical extent of the development limits shown within the current Matters Arising Consultation document.

Firstly, the settlement boundary illustrated within the PDF version of the Matter Arising Changes documents (Figure 3) appears to be at odds with the boundary presented within the Council's interactive online mapping (Figure 2). As mentioned above whilst we understand that the intention is to amend the development limits of Bryn to incorporate Phase 1 of the site known as 'Land off Heol y Mynydd, Bryn' and, by virtue of which the unregistered parcel of white land located immediately to the south (BR maintains concerns regarding this approach). Currently there are discrepancies between the two plans which creates uncertainty as to the physical extent of the defined urban area and in turn adds an unnecessary layer of complication when interpreting the proposed changes. It is therefore essential that the Council clarifies the proposed arrangements on the PDF version (Figure 3) and rectifies any inconsistencies to ensure that all interested parties are able to make informed decisions based on an accurate and robust evidence base.



Secondly, there also appear to be inconsistencies in the allocation reference numbers relating to Land off Heol y Mynydd, Bryn. Throughout the Revised LDP, the allocation is generally referred to as PrC2/(V). However, within the Matter Arising Changes documentation, the site is identified as (MACM)PrC2/c, with the land to the south-east of Land off Heol y Mynydd, Bryn is allocated as (MACM)PrC2/v. Similar to the above these inconsistencies create ambiguity and have the potential to undermine effective interpretation and implementation of the Plan.

For completeness it is important that both of these matters are rectified for the purposes of accuracy/ transparency, and that the Revised LDP and all associated documentation consistently reflect the Council's intended position. Notwithstanding Barratt Redrow's continuing concerns regarding the appropriateness of extending the settlement boundary to include the unregistered parcel of white land, priority should instead be given to extending the proposed allocation at Heol y Mynydd, Bryn so as to provide a more coherent and defensible settlement edge.

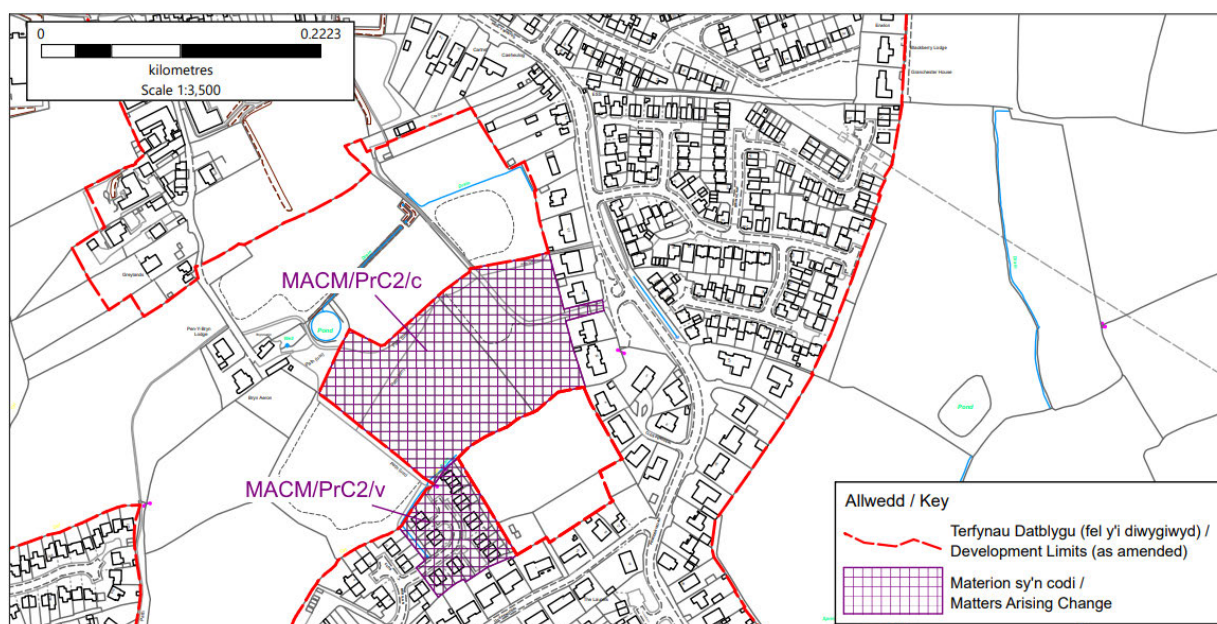


Figure 3 - Extract from Changes on Map Document

Change to Policies relating to Residential Development

Policy INF4 (Llanelli Wastewater Treatment Works Catchment Surface Water Removal)

"In order to protect the water quality of the Carmarthen Bay and Estuaries European Marine Site, proposals for major development that would drain directly into the Llanelli Waste Water Treatment Works will be required to remove a quantifiable amount of surface water from the combined sewer system.

Minor development which drains directly into the Llanelli Wastewater Treatment Works may also introduce the removal of surface water as a mitigation measure to secure nutrient neutrality where required in accordance with Policy CCH4."



BR supports the principle of the proposed amendments and acknowledges that Dŵr Cymru Welsh Water (DCWW) have confirmed there is sufficient capacity exists within the Llanelli Wastewater Treatment Works (WwTW) to accommodate the level of growth identified within the RLDP.

It is also noted that DCWW has requested that major development proposals draining directly to the Llanelli WwTW should be required to remove a quantifiable amount of surface water from the combined sewer network. This requirement is reflected within the proposed policy wording.

The rationale for this approach is understood to be associated with the fact the majority of the sewerage network within the Llanelli WwTW catchment comprises a combined system conveying both foul and surface water flows. Therefore, requiring major development proposals to undertake compensatory surface water removal as part of the planning process remains consistent with Welsh Government guidance and is intended to ensure that development does not give rise to adverse effects on the Carmarthen Bay and Estuaries SAC and/or the Burry Inlet SPA.

Supporting text explains that, as part of the determination of planning applications for relevant major developments, CCC will require the removal of a quantifiable amount of surface water from the combined sewer system. Whilst this figure is not expressly contained within the proposed policy wording, it is understood that the amount of new foul flow identified within Policy INF4 has been calculated at 0.013 litres per second per residential property. BR raises no objection in principle to this approach on the basis that further guidance will be produced in the form of the emerging Burry Inlet Supplementary Planning Guidance (SPG). In the interest of soundness clear and robust guidance must be provided setting out the Council's expectations in respect of the details needed considered at the planning application stage via drainage reports.

It is recognised that the removal of surface water from the combined sewer network is likely to require bespoke solutions, dependent upon the scale, characteristics and location of individual developments. BR therefore supports the approach whereby mitigation measures are considered on a site-specific basis.

As identified within the Council's Habitats Regulations Assessment – Additional Sites Addendum (March 2025), the site at Land off Heol y Mynydd, Bryn (Ref. PrC2/(v)) is located approximately 1.4 km from the Carmarthen Bay and Estuaries SAC and approximately 2 km from the Burry Inlet SPA. Whilst the Council concludes that localised effects associated with the site's proximity to these designated sites are unlikely. BR remains committed to ensuring that appropriate mitigation measures are secured where necessary. Such measures may include a combination of:

- design-led mitigation measures;
- utilisation of existing headroom and permit capacity associated with the relevant WwTW; and
- strategic mitigation solutions capable of addressing any additional nutrient loading arising from future development.



By virtue of the above BR supports the principle of the proposed amendments, subject to further information being provided by the emerging Burry Inlet SPG. In that regard it will be important that the requirements are clearly set out and applied proportionately through the development management process to provide certainty for applicants and ensure that the delivery of much-needed housing is not unnecessarily delayed or constrained, whilst continuing to secure appropriate environmental safeguards.

Policy PSD1 (Effective Design Solutions: Principles of Placemaking)

Whilst the proposed amendments to Policy PSD1 are not identical in wording to that introduced under Policy INF4. Both seek to promote the efficient use of water in new development and recognise the wider role that water management measures can play in contributing towards nutrient neutrality.

To avoid repetition, please refer to our response to Policy INF4. In particular, the importance of ensuring sufficient flexibility is incorporated into both the proposed policy wording and that of supporting text to reflect the fact that, where necessary, nutrient mitigation may be achieved through a combination of different mechanisms.

This approach is essential to ensure the RLDP accurately reflects the range of options through which nutrient mitigation may be secured and thus support the timely delivery of much-needed housing whilst ensuring compliance with the Habitats Regulations.

Policy PSD8 (Provision of Open Space)

In principle BR does not object to the requirements set out within Policy PSD8, which seek to ensure that new residential development contributes towards the provision of open space in accordance with the Council's proposed standards (please refer to extract below).

That said, BR considers it important that the policy retains sufficient flexibility to recognise that, in some circumstances, it may not be feasible or appropriate for all open space standards to be met on-site. In such instances, the option to make a financial contribution in the form of a commuted sum towards the enhancement or provision of off-site open space should continue to be explicitly supported within the policy wording.

From a plan-making perspective retaining this mechanism will provide a pragmatic and proportionate approach to securing open space provision. Whilst ensuring that site-specific constraints do not unnecessarily impede the delivery of much-needed housing to demonstrate that the RLDP is logical, reasonable and balanced in accordance with Test 2 of the DPM.



Open Space Category	Quantity Standard		Accessibility Standard
	Per 1000 People (ha)	Per Person (m2)	
Play Space	0.8	8	Doorstep: 1½-minute walk (100m) Local: 5-minute walk (400m) Neighbourhood: 12½-minute walk (1,000m)
Outdoor Sports	1.6	16	Playing Fields: 15-minute walk (1,200m)
Accessible Greenspace	0.25	2.5	Wherever possible
Community Growing Space	0.2	2	-

Figure 4. Extract of CCC's Proposed New Open Space Standards

Policy PSD14 (Housing Density)

BR acknowledges that Policy PSD14 is a new policy introduced through the Matter Arising Changes to the RLDP.

Whilst we does not object to the principle of promoting efficient use of land through higher residential densities in sustainable locations. BR considers that the target density of 50 dwellings per hectare within Tier 1–3 settlements should be aspirational in nature rather than applied as a prescriptive requirement. The delivery of well-designed, sustainable places should remain the primary consideration, with exact densities considered on a site-by-site basis having regard to local context, placemaking objectives and physical constraints.

PPW12 promotes the creation of high-quality places that respond positively to their surroundings rather than rigid density standards. An overly restrictive approach risks prioritising numerical targets over good design and could result in compromises with regards to proposed layouts, reduced POS/amenity provision, or even conflict with other policy requirements relating to landscape, ecology, heritage and residential amenity.

Furthermore, increasing requirements associated with SAB, green infrastructure and ecological mitigation all have a direct impact on the net developable area of sites. In such circumstances, lower density development may represent the most sustainable, appropriate and deliverable form of development.

Whilst the policy recognises that lower densities may be acceptable in certain circumstances, BR considers that greater emphasis should be placed on allowing departures from the indicative densities where justified by design considerations, viability evidence or other material planning considerations. Such an approach would ensure the policy is suitably flexible to support the delivery of high-quality developments across Carmarthenshire.

Lastly, the exact wording of Policy PSD14 should be revisited to avoid duplication and reduce any ambiguity when interpreting the policy through the development management process.



Policy TRA2 (Active Travel)

Policy TRA2 seeks to support development that promotes active travel by requiring developments to provide, or contribute towards, walking and cycling infrastructure.

BR support the principle of promoting active travel and improving opportunities for walking and cycling in accordance with national planning policy, the Active Travel (Wales) Act 2013 and wider sustainability objectives. However, suggest that amendments should be made to the proposed wording of Policy TRA2 to ensure it remains proportionate to proposed scheme and able to consistently applied when determining a range of development proposals.

The policy requires development proposals to incorporate active travel infrastructure within development sites and/or make financial contributions towards off-site provision. Whilst off-site improvements may be appropriate in certain circumstances, the policy should clarify that any financial contributions will only be sought where they are directly related to the development and reasonably related in scale to the proposed scheme. Without such clarification there is a risk that the policy could result in requests for contributions towards wider network improvements that do not meet the relevant legislative tests.

From a practical standpoint if development sites are expected to contribute financially towards Active Travel scheme as mitigation measures, then the scale and mechanism of those contributions should be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy TRA2 could introduce unforeseen costs and extensive time delays, potentially affecting the plan's ability to meet its housing requirements.

Additionally, the policy states that development proposals which have a "*significant adverse impact*" on a Public Right of Way or existing Active Travel route will be expected to provide alternative routes. Whilst the objective of protecting and maintaining route connectivity is supported, the policy does not define what would constitute a "*significant adverse impact*". As drafted, the wording is open to interpretation and could result in inconsistent decision-making and uncertainty for applicants.

BR suggest that the absence of a clear definition makes it difficult for applicants to understand when mitigation measures or alternative routes will be required and may lead to disproportionate requirements being imposed on development proposals.

Finally, significant weight should be given to development proposals that retain, protect and positively integrate existing Public Rights of Way (PRoW) within their design. Schemes that incorporate and enhance established walking and cycling routes can help maintain connectivity, encourage sustainable travel, support public access to the countryside, and preserve the character and recreational value of the local area. Accordingly, proposals that successfully accommodate existing PRoW, whilst safeguarding their accessibility, safety and amenity, should be supported according and this position reflected within the overall planning balance.



Policy CCH4 (Water Quality and Protection of Water Resources)

BR supports the principle of the proposed amendments and acknowledges that development will only be permitted where it can be demonstrated that there would be no adverse effect on the integrity of nutrient-sensitive protected sites and, where necessary, proposals may be required to achieve nutrient neutrality.

It is noted that the supporting text confirms that the Council is preparing developer-led mitigation guidance/toolkits together with strategic mitigation guidance and a focused Action Plan to assist in addressing nutrient impacts arising from future development. BR supports this solution-orientated approach, recognising that suitable nutrient mitigation is most effectively achieved through a layered and flexible mitigation strategy. Whilst this work remains ongoing, it is important that opportunities to bring forward strategic mitigation measures are progressed as quickly as possible, drawing upon public capital programmes and other available funding mechanisms where appropriate. The timely delivery of strategic solutions will provide greater certainty to developers, support confidence in the planning process and help facilitate the delivery of much-needed housing without unnecessary delay.

BR welcomes the Council's commitment to preparing mitigation guidance and considers it essential that this provides applicants with access to a broad range of mitigation options that can be considered on a case-by-case basis. In particular, opportunities to achieve nutrient mitigation should be considered through a combination of different options. Whilst not intending to repeat information above this should include but not limited to:

- design-led mitigation measures;
- utilisation of existing headroom and permit capacity associated with the relevant Wastewater Treatment Works (WwTW); and
- strategic mitigation solutions capable of addressing additional nutrient loading arising from future development.

From a practical perspective, this approach should theoretically enable applicants to identify and implement the most appropriate mitigation measures, either individually or as part of a package of interventions, incorporating both on-site and off-site opportunities, including surface water removal where appropriate.

In circumstances where development drains directly to a Wastewater Treatment Works that discharges into a nutrient-sensitive freshwater catchment and nutrient neutrality is required, the removal of surface water from the combined sewer network should also be recognised as a potential mitigation measure capable of assisting in reducing nutrient loading. It is important that the proposed policy aligns with the requirements of Policy INF4 to ensure consistency across the Plan, avoid duplication and provide sufficient flexibility to demonstrate the RLDP is capable of meeting local housing need in accordance with Test 2 of the DPM.



Conclusion

BR broadly supports the Council's proposed modifications to the RLDP and its commitment to increasing housing delivery across Carmarthenshire. However, it is considered that further amendments are necessary to ensure the Plan is sufficiently robust, flexible and capable of meeting identified housing needs throughout the plan period.

In particular, significant weight should be given to the most recent demographic evidence, with a corresponding uplift in both the overall housing provision and flexibility allowance to provide additional resilience against potential delays or under-delivery from strategic sites and commitments. Concerns also remain regarding the Council's overreliance on committed housing sites, particularly where outline permissions have lapsed or where emerging legislative and technical requirements may affect deliverability.

BR strongly supports the allocation of Land off Heol y Mynydd, Bryn, but maintains that allocating the site in its entirety for up to 160 dwellings would make more efficient use of a sustainable and deliverable site, provide greater certainty in meeting local housing needs, and contribute to a more resilient housing trajectory. Related amendments to development limits and mapping inconsistencies should also be addressed to ensure transparency and effective implementation of the Plan.

Lastly, these representations support the principle of the proposed amendments relating to DM policies pertinent for residential development (i.e. Policies INF4, PSD1, PSD8, PSD14, TRA2 & CCH4), subject to policies being applied proportionately and supported by clear guidance. Across all matters, sufficient flexibility should be retained to enable site-specific solutions, avoid unnecessary constraints on housing delivery and ensure the emerging RLDP is underpinned by a robust, credible and locally responsive evidence base capable of satisfying the test of soundness set out within the Development Plan Manual for Wales.

Yours sincerely



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Director

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Appendix 1 – Review of CCC Remaining Housing Commitments

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For completeness the table below provides a review of all sites which are identified as benefiting from outline planning permissions included within the Council's Proposed Housing Trajectory.

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The review identifies that a significant proportion of outline permissions currently relied upon within the Housing Trajectory appear to have either:

- lapsed through failure to submit Reserved Matters applications within the prescribed period;
- not progressed to a stage where development can lawfully commence due to outstanding pre-commencement conditions; or
- require further clarification regarding subsequent permissions, variations or implementation.

Cluster 1

Site	Ref.	Units	Trajectory Year	Permission Date	Status	Commentary
Springfield Road	W/35903	29	2026/27	23 May 2019	Lapsed	No Reserved Matters application submitted within required period. No evidence of discharge of conditions.
Rhiw Babel	PL/00876	9	2025/26	24 June 2021	Lapsed	Reserved Matters required within three years. No submission identified.
Land adjacent 93-94 Abergwili Road	PL/05745	9	2027/28	9 May 2024	Extant	Reserved Matters may be submitted until 9 May 2027.



Lime Grove	W/28553	19	2025/26	9 December 2014	Lapsed	No Reserved Matters application identified.
Land adjoining Tabernacle Chapel	S/28103	11	2026/27	19 July 2019	Lapsed	No Reserved Matters application submitted.
Land off Heol Llanelli	PL/00019	10	2026/27	28 May 2021	Lapsed	No Reserved Matters application identified.
Adjacent Fron Heulog	W/20990	6	2025/26	16 October 2009	Uncertain	Council trajectory records two completions. Further clarification required regarding full permission.

Cluster 2

Site	Ref.	Units	Trajectory Year	Permission Date	Status	Commentary
North Dock (Former Pontrilas)	S/38285	210	2027/28	2 November 2021	Lapsed	No Reserved Matters submission identified.
Cwm y Nant, Dafen	S/40692	202	2026/27	29 July 2021	Lapsed	No Reserved Matters submission identified.
Land at Cefncaeau	PL/05187	91	2026/27	2 December 2024	Extant	Reserved Matters may be submitted until 2 December 2027.
Land at Monksford Street	S/17768	70	2027/28	8 August 2022	Potentially Lapsed	No Reserved Matters application identified.
Burry Port Harbourside	S/30678	364	2026/27	27 January 2016	Lapsed	No Reserved Matters application identified.



Land off Heol y Parc	PL/04430	7	2026/27	29 August 2024	Extant	Reserved Matters submission required by 29 August 2027.
Box Farm	S/33213	7	2026/27	2 May 2017	Potentially Lapsed	Trajectory references possible Variation of Condition application. Further verification required.

Cluster 3

Site	Ref.	Units	Trajectory Year	Permission Date	Status	Commentary
Land at Tirychen Farm	E/21663	150	2026/27	10 October 2014	Lapsed	No Reserved Matters submission identified.

Cluster 4

Site	Ref.	Units	Trajectory Year	Permission Date	Status	Commentary
Cilgwyn Bach	W/30682	14	Not stated	27 August 2015	Partially Implemented	Council trajectory records one dwelling completed in 2024/25.

Cluster 6

Site	Ref.	Units	Trajectory Year	Permission Date	Status	Commentary
Land adjacent Gardde Fields	PL/00736	8	2026/27	7 September 2023	Extant	Reserved Matters submission required by 7 September 2026.



Land at Cae Glas	W/21657	5	2031/32	10 February 2012	Lapsed	No Reserved Matters application identified.
Land adjacent the Beeches	PL/02934	50	2026/27	30 September 2022	Potentially Lapsed	No Reserved Matters application identified.
Adjacent Laugharne School	W/35450	42	Not stated	5 December 2018	Under Construction	Council trajectory records nine completions to date.
Land to rear of Maesglas	W/38320	9	2026/27	20 May 2021	Lapsed	No Reserved Matters application identified.

