

HEARING SESSION 13 – PROSPERUS PEOPLE AND PLACES – ADDITIONAL SITES (CLUSTERS 1 – CARMARTHEN AND 3 – LLANELLI)

Wednesday 17th September 2025 – 10:00 – 17:00 (Virtual Hearing)

Matter 13: Prosperous People and Places – Additional Sites (Clusters 1 – Carmarthen and 3 – Llanelli)

Prepared on behalf of Barratt David Wilson Homes (BDWH), South Wales

Issue - Are the allocated sites soundly based and capable of delivering new residential, community and commercial development over the Plan period?

Additional Sites
PrC1/(iv) - Land off Trevaughan Road, Carmarthen
PrC2/(ii) – Land at Cefncaeau, Llanelli
PrC2/(v) – Land off Heol y Mynydd, Bryn
PrC2/(iii) – Land at Pendderi Road, Bryn
SeC3/(ii) – Land at Monksford Street, Kidwelly
SeC6/(ii) – Fforest Garage, Fforest
SeC6/(iii) – Land at Fforest Road,
SeC7/(i) – Land at Pontarddulais Road

PrC2/(v) – Land off Heol y Mynydd, Bryn

a) What is the current use of the allocated Site?

Agricultural land

b) What is the proposed use of the allocated site?

Residential Development for up to 160 dwellings (as proposed by BDWH).

c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

The site is subject to a signed Statement of Common Ground between Carmarthenshire County Council (CCC) and Barratt David Wilson Homes (BDWH), dated June 2025, in which it was agreed that there are no significant constraints to limit development. Reference is made to the mineral safeguarding area (Category 1 – Sandstone and Igneous), however, is considered to be already largely sterilised as it is within 200m of a sensitive development.

Following discussions, we are aware that Natural Resources Wales (NRW) have recently issued updated condition assessments for SAC's and SPA's affecting Carmarthenshire which includes: i) Carmarthen Bay and Estuaries SAC; ii) Carmarthen Bay; and iii) Burry Inlet SPA. Whilst we appreciate CCC are waiting for further evidence to be released by NRW to fully assess the potential implications of such findings. As a national house builder BDWH have extensive experience working across Wales

and the rest of the UK to overcome nutrient sensitivities. In the case of Land off Heol y Mynydd, Bryn BDWH remain committed to ensuring sufficient mitigation measures are delivered to achieve nutrient neutrality and thus avoid having any detrimental impact on coastal and marine environments, including those posed by Dissolved Inorganic Nitrogen (DIN). Further details of which shall come forward as part of any future planning application and informed by the recommendations of the technical work current being undertaken by CCC, NRW and other relevant stakeholders.

d) In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?

As confirmed in the signed Statement of Common Ground BDWH have previously submitted evidence to demonstrate the site as a whole is suitable, viable and deliverable for residential development for up to 160 dwellings. This has been evidenced in the supplemented Burrows-Hutchinson Development Viability Model (DVM) and the Statement of Common Ground concludes that the *'site value indicated is sufficient to encourage the landowner in this case to release the land for the proposed development'*.

It is also important to note that BDWH are a national house builder who have undertaken their due diligence to ensure that the site is viable and deliverable.

e) Are the number of residential units proposed realistic and deliverable over the plan period?

BDWH remain fully committed to the development opportunities presented by Land off Heol y Mynydd, Bryn and are confident the site will be brought forward in its entirety. BDWH are aware of the Councils position based on an 80 dwelling allocation, and whilst the principle is agreed, maintain that the site is capable of accommodating up to 160 dwellings over the plan period, subject to further detailed design.

The full justification relating to the up to 160 dwellings allocation has been outlined in continued representation submissions through the Plan process, however most recently detailed within the Heol-y-Mynydd, Bryn (Site Ref. PrC2/(v)) representations to the Carmarthenshire Revised Local Development Plan 2018 – 2033 Additional Sites Consultation, March 2025. Whilst not repeated in full within this Hearing Statement, the summary is as follows:

- BDWH agree in principle to the increase of the flexibility allowance back up to 10%, however, consider this should be a starting point and that the flexibility allowance should be further increased to at least 15% (equivalent to 1,323 dwellings) in order to ensure that the Plan is effective in meeting local housing need.
- BDWH specifically support the identification Llanelli as a 'Growth Area' within the RLDP, noting its inclusion within the refined National Growth Area for the Swansea Bay and Llanelli NGA as identified in Policy 28 of the National Development Framework. Here, Llanelli forms a designated principal centre and focus for delivery, along with villages within its urban outskirts. BDWH consider that Llanelli is capable of accommodating a significant proportion of growth within the County where medium scale sites are available within Cluster 2. Llanelli, being a Tier 1 settlement, is essential in delivering Carmarthenshire's housing delivery targets and should allocate sites that are developer lead and allow early delivery in the trajectory and is the reason why BDWH support the up to 160 dwelling allocation PrC2/(v) -Land off Heol-y-Mynydd, Bryn as part of HOM1.

- BDWH agree in principle to the allocation of Land off Heol y Mynydd, Bryn for residential development, however, suggest that the site is able to accommodate up to 160 dwellings rather than the 80 dwellings currently proposed. In part it was understood that the 80 dwelling allocation was due to a perceived over development in Bryn by the Council. As detailed within the March 2025 Additional Sites representations this is something that BDWH do not agree with and clearly set out that the current development in Bryn have or are coming to completion and there is a demand for the additional up to 160 dwellings.
- A number of the proposed allocations, as well as previously allocated sites, have constraints which are likely to slow down the delivery of homes, in particular over the early stages of the plan period.

Overall, BDWH is wholly supportive of the allocation of Land off Heol y Mynydd, Bryn as a suitable, deliverable and viable strategic allocation for residential development within Carmarthenshire's RLDP and is committed to promoting and delivering their land interests for residential development and delivering homes to meet the County's needs.

f) What are the mechanisms and timescales for delivering the site?

BDWH have secured an option for the site with the landowner and as a national house builder with a proven track record in the area can provide sufficient certainty the site will be delivered at a suitable point over the emerging plan period in line with CCC's proposed trajectory.

As outlined in the Statement of Common Ground, BDWH are aware of the Council's position based on an 80 dwelling allocation, as below, and do not disagree with the trajectory:

Dates	2027/28	2028/29
Anticipated Completions	40	40

However, BDWH maintain the position that the site is capable of delivering up to 160 dwellings and proposes a trajectory for deliver as follows:

Dates	2026/27	2027/28	2028/29	2029/30	2030/31
Anticipated Completion	-	40	40	40	40

g) Is the allocation of the site essential to ensure the soundness of the plan?

BDWH agree with Carmarthenshire County Council's approach of needing to identify additional site allocations to achieve the minimum 10% threshold required, however, note that this figure should be uplifted to at least 15% in order to ensure that the Plan is both effective and deliverable. It is considered important that the Council ensure a diverse portfolio of sites are allocated within the emerging plan to maintain a consistent supply of housing particularly earlier on in the plan period.

Whilst BDWH wholly support the principle of the proposed allocation, it is noted that the Council has identified only the eastern portion of the site for 80 dwellings, however BDWH believe there is sufficient evidence to justify allocating the site 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 within the trajectory elsewhere.

Alternative Site Assessments

An outline of the concerns raised in regard to the remaining Alternative Site is provided below:

PrC1/(iV) – Land off Trevaughan Road, Carmarthen

c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

It is considered that this site is affected by constraints that in turn provide significant obstacles to development of the site within the Plan period. Approximately 60% of the site is identified as Grade 3a (Good) Quality Agricultural Land.

Whilst BDWH note within *'Report on the findings of the Additional Sites Consultation Including the Publication of Supporting Evidence'* (ED10) that the Council conclude that *'the portion of land identified as grade 3a totals less than 1ha in area'*, it still constitutes 60% of the site. In accordance with national policy - Paragraph 3.59 of Planning Policy Wales 12th Ed - this falls within the definition of Best and Most Versatile (BMV) land and in turn raises queries around the sites suitability to accommodate future development given the quality of agricultural land that would subsequently be lost (irrespective of the size).

e) Are the number of residential units proposed realistic and deliverable over the plan period?

As further noted within (ED10), it is evident that there is no developer on board with the site. Questions are therefore raised regarding the site's deliverability over the plan period. The report also states that the site, allocated for 30 dwellings, is not anticipated to be completed until 2031-31. As previously mentioned, it is considered important that a diverse portfolio of sites are allocated within the emerging RLDP to ensure that housing can be delivered in the short term.

SeC6/(ii) – Forest Garage, Forest

e) Are the number of residential units proposed realistic and deliverable over the plan period?

Concerns are raised in regard to deliverability and viability of site allocation SeC6/(ii). Whilst BDWH broadly support the Council's intention to allocated residential development on this small parcel of brownfield land, it is important to recognise potential challenges these types of sites present both in terms of viability and deliverability.

Research undertaken by Lichfield in June 2022 (Banking on Brownfield Research Paper) emphasises the fact that a key characteristic of brownfield development is the need for developers to deal with the legacy of existing or previous uses which often requires extensive remediation works at a significant cost to the project's overall viability. On that basis it is crucial that the RLDP is not over-reliant on the delivery of brownfield land and as such the Council acknowledges a need to identify a diverse portfolio of sites in order to ensure the emerging plan is soundly prepared.

These complexities often lead to significant delays in housing delivery, especially earlier on during the plan period. As such it is important that the Council allocates a range of sites including small to medium

greenfield plots which can help maintain a supply of housing throughout plan period and thus account for longer lead-in times and other unforeseen issues on brownfield sites.

Potential constraints that arise as part of the development could lead to a reduction in the number of dwellings. On a development of 8 units, the loss of 1 or 2 units could render the scheme unviable and subsequently rendering the site undeliverable.

SeC7/(i) – Land at Pontardulais Road, Llangennech

e) Are the number of residential units proposed realistic and deliverable over the plan period?

From review of ED10 and in particular the Statement of Common Ground it is noted that the Council are suggesting that assessment have been provided in support of the proposed allocation, however, we do also note that these pieces of evidence are 'somewhat dated' being from 2018. BDWH would consider this to be excessively dated and that there have been significant policy changes since their publication and that it would be near impossible to rely upon the conclusions to clearly evidence that the site is deliverable. Without the same level of assessment as required from alternative allocated sites then it is not possible to have a full understanding of the potential constraints.

Furthermore, it is noted that the Councils Highways Department still have some reservations regarding the potential impact development in this location could have in exacerbating existing capacity issues along Pontardulais Road, the Talyclun Traffic Signals and the A4138 through to M4 Junction 48.

Again, it is reiterated that the previous evidence is from 2018, and it is not clear that any further traffic surveys have taken place in order to provide further information surrounding the reservations held by the Councils Highways Department and therefore the deliverability of this site is questioned.

ED10 further confirms that the site is not currently under an option-agreement with a developer, however, states that housing is anticipated to be delivered at a rate of 15 dwellings per annum between 2026-29 and that 'discussions' are taking place. As a result, there will inevitably be delays in securing a developer as well as legal delays in getting the developer on board. Once a developer is secured, there will then be further delays whilst a planning application is prepared, submitted, and determined. This would then be followed by a further discharge of conditions application. Whilst BDWH appreciate the challenges this poses, it inevitably leads to further delays in determining applications and therefore considered that development will not commence in 2026 as suggested and will not deliver in the early years of the adopted Plan. This is contrary to the proposed up to 160 dwellings at PrC2/(v) – Land off Heol y Mynydd, Bryn which are promoted by BDWH, who can provide certainty in their delivery.