## CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN 2018-2033

#### CANDIDATE SITE SUBMISSION

# PROPOSED RESIDENTIAL ALLOCATION ON LAND ADJACENT TO TRAVELLERS REST, CARMARTHEN.

### MENTRUS DEVELOPMENTS

### CONTEXT DOCUMENT

A greenfield site of improved pasture, which has been used for some years for winter grazing. It has a site area of 23999 sq. metres (approx. 5.9 acres), and rises significantly from its southern, roadside (Llysonnen Road) boundary, to the hedgeline on the north. It is adjoined along the whole length of its eastern flank by what is now an estate of modern housing, whilst to the west are the group of established, largely individual properties which form the group known as Travellers Rest ,along with a small paddock currently designated as a housing allocation. On top of the hill slope to the north sits a large, commercial animal feed mill accessed from Llysonnen Road.

In the context of the extant Local Development Plan 2006–2021 the site lies within the development limits of the Carmarthen Growth Area (GA1). Additionally it is within the boundaries of the West Carmarthen Planning and Development Brief (adopted September 2010 as Special Planning Guidance). The latter document allocates the submission site, together with the land parcel to the north, for employment use.

Consequently, under instruction from the landowners, the land has been actively marketed as an employment site since February 2013 by national agency Lambert, Smith, Hampton, and by local agents BJP Estates. Their reports over this period (attached herewith) clearly show there has been no substantive interest from any form of employment opportunity during a period in excess of 10 years, its relatively isolated location, its remote location from other commercial users, lack of infrastructure and connectivity, the access route past residential properties and its proximity to those residential properties possibly giving rise to complaints of noise, smell, working and activity hours, the simple presence of industrial units being resented by established residents – all potential deterrents. In conjunction with that simply lack of demand when there are numerous more attractive, serviced, and better located employment sites available in and around Carmarthen have shown the land to be unsuited for its allocated use. In fact, given the fact that the submission site is immediately adjoined along both flank boundaries by existing and proposed residential development, employment use quite frankly is clearly unsuitable.

The Development Brief was of its time (2010), and it may well have been "in vogue" to fashion an integrated environment with residential and employment uses cheek by jowl. In reality that simply does not work, the uses are not compatible, and would undoubtedly result in societal and environmental problems. The text of the Development Brief provides no methodology, reasoning, or rationale as to the determinants which produced the conclusion that this particular site should provide the token employment location which appeared to be required. The 2010 SWOT Analysis merely states blandly, and classifies it, with no supporting evidence/reasoning; "Site area able to accommodate identified and future housing, employment, educational and recreational needs for the town." and,

"Potential to create high quality mixed use neighbourhood at western edge to Carmarthen and act as gateway to the town."

With a Masterplan objective of;

Providing "Sufficient land to accommodate a mix of type and size of employment land." There are of course just two fields, the candidate site, and that to the north which shares a common boundary with the established agricultural feed mill."

Even at the preparation of the Development Brief the likely conflict between employment (of whatever nature) and residential uses was noted, with the recommendation for the "development edge" being;

"Boundary between employment and residential – A strong landscaped boundary between the two land uses should be incorporated for visual and amenity reasons. Rear gardens adjacent to the landscaping belt will provide a further buffer."

It is surely a simple planning land use philosophy, softening and enhancing appearance yes, but if you have to hide any new development it should not be permitted there in the first place, especially in cases such as this where the residential element is established and employment activities are imposed alongside.

Planning Policy Wales (Edition 11) is clear in para 5.47, " Development plans and development management decisions should be based on up to date local and sub regional evidence. It is important that such evidence demonstrates the suitability of the existing land supply as well as future provision in relation to the locational and development requirements of business." It cannot be clearer than in the marketing background produced by Lambert Smith Hampton and BJP Estate Agents. In 10 years of open marketing there have been a small handful of enquiries but not one firm offer of purchase, lease or rent of any part of this currently allocated employment land – clearly evidencing the unsuitability of its allocation. Whatever the reason(s), and undoubtedly proximity to residential property, and relative distancing from other business areas, suppliers etc, lack of security, lack of services and site infrastructure are obvious and potent issues, which show this site to be not suited to employment uses.

Planning Policy Wales goes on to say that (para. 5.412) "Through the development plan process planning authorities and relevant stakeholders should work together to identify the most appropriate land for (employment) development."

(para. 5.413) "Planning authorities should aim to (amongst other objectives), promote the re-use of previously developed, vacant and underused land; and control and manage the release of unwanted employment sites to other uses.

(para.5.415) "Whilst employment and residential uses can be compatible, planning authorities should have regard to the proximity and compatibility of proposed dwellings to existing industrial and commercial uses to ensure that both residential amenity and economic development opportunities are not unduly compromised.

Whilst the provision of adequate employment land in the County is an absolute essential, a random field sandwiched between residential properties and which has been on the market for

10 years is not the answer, whilst the example given in the paragraph preceding this must be equally true in reverse. The West Carmarthen Development Area is becoming an attractive residential location with good travel linkage into the town centre of Carmarthen. The many families who have committed their futures to the area would surely require the setting to be enhanced by further, quality residential development rather than be immediately adjoined by the hubbub and form of traffic generated by commercial activity immediately alongside, and thus it is argued that the site should be re-allocated for residential development.

Attached; Candidate Site Location Plan Indicative Site Layout Transport Statement Biodiversity Appraisal and Checklist Drainage Strategy and Infrastructure Review Marketing Review

Plan Extract from Carmarthen West Special Planning Guidance