

CANDIDATE SITE SUBMISSION II

**PROPOSED RESIDENTIAL ALLOCATION ON LAND AT WATERLOO ROAD,
PENYGROES, CARMARTHENSHIRE.**

MANNOR HOMES LTD.

CONTEXT DOCUMENT

This is a greenfield site of 4762 sq. metres of improved pasture abutting the rear garden boundaries of recently constructed dwellings fronting the eastern flank of the B4297 Waterloo Road, and also abutting the rear garden boundaries of properties on the southern flank of Bryndedwyddfa, Penygroes. The land falls gently to the north eastern corner.

Full planning permission was granted across the road frontage of the field for “ the erection of 4 dwellings and a compensatory ecology area,” on 4th February 2019. Three of the dwellings have been constructed and are occupied, whilst the fourth plot remains undeveloped in order to provide appropriate width for a vehicular access of adoptable standard into the site subject of this submission. The proposed vehicular access lies within current development limits.

Otherwise, there is an entirely built up frontage in both directions along this flank of the classified road which forms the north/south highway axis through Penygroes, whilst the northern boundary of the candidate site adjoins the rear wall/fence line of the established residential properties in Bryndedwyddfa. To the south lies the extensive garden area of the detached dwelling named Garnllwyd, separated from the candidate site by a drainage ditch, and screened by a line of self seeded trees and scrub. The Transport Statement, the Biodiversity Appraisal and Checklist, and the Drainage Strategy, all of which are submitted herewith, all indicate that there are no issues which would prevent development,

Mannor Homes are a small, local building company with all its employees and sub contractors living in, or close to, Penygroes. The three dwellings completed to the front of the submission site are of quality, with high levels of sustainability, and the company has received many enquiries from local residents about the possibility of purchasing further properties (particularly retirement bungalows), on the land to the rear. As will be demonstrated in this Statement there is no site in or near Penygroes that caters for such local needs.

In the context of the extant Local Development Plan the site immediately adjoins the current defined development limits of the Ammanford and Cross Hands Growth Area (GA3). As an acknowledged growth area with good access to the A48 corridor, there was a substantial allocation of 2552 residential units over the plan period. Given its extremely convenient location, with excellent accessibility not only to the A48 and A476, but also to local employment, retailing and educational opportunities, sites in and adjoining Penygroes had an allocation of some 250 new dwellings within the current Local Development Plan, and for the plan period 2006 -2021.

The **2nd Deposit Revised Carmarthenshire Local Development Plan 2018-2033 – Proposals Map** appears to address the need and the suitability of sites for new housing in Penygroes with a total allocation of some 293 new dwellings. However, just 5 years into the plan period;

PrC3/h23 Land at Waterloo Road allocation 13 dwellings – **completed**

PrC3/h24 Land between 123 and 137 Waterloo Road allocation 7 dwellings – **completed**

PrC3/h25 Land off Gate Road allocation 8 dwellings – **completed**

PrC3/h35 Land at Clos Penpont allocation 9 dwellings – **completed**

The **only** allocated sites that still retain potential for development during the plan period are;

PrC3/h22 Adjacent to Pant y Blodau, allocation 79 dwellings, 0 built, and

PrC/MU1 Emlyn Brickworks allocation 177–9 built.

Examining both these sites;

PrC3/h22 Adjacent to Pant y Blodau

This is located almost directly opposite Mannor Homes candidate site on the facing Flank of Waterloo Road, the greater part of the land being in the ownership of a large building contractor from outside the area. An original full planning application (E/22489) for 79 dwellings on **part** of the proposed allocation was refused permission by the Local Planning Authority in February 2013 as, amongst other reasons, there were concerns of the affect a single development of this size would have on the character and culture of the area and the Welsh language in Penygroes. This decision was supported by the Planning Inspectorate on appeal.

A second, almost identical application (E29910) was subsequently granted planning permission by the Local Planning Authority despite there being no reduction in number of dwellings . This was approved in April 2015. In what would appear to be an act seeking to “safeguard” the full planning permission the developer has made what it regards as a “start” to development. The validity of such a “start” is strongly disputed as;

- a) In an obvious (failed) attempt to lay, (or at least appear to commence to lay) the access road into the site, a lorry load or two of tarmac has been tipped and rolled on the line of the access road. No kerb lines, pavement, etc. have been formed. From its appearance it will need to be removed and properly reconstructed if and when work starts in earnest. It is clearly an artifice, and it is hoped the Local Planning Authority have not been fooled into conceding a commencement on this basis. No other “proper” commencement appears to have been made, in which case the planning permission on which the site relies would have expired in 2020.
- b) In any event there are at least 4 conditions of the planning permission (nos. 11, 12, 14 and 17), which require tasks to be undertaken **prior to** the commencement of any development. Thus unless these conditions were fully complied with beforehand, the laying of tarmac cannot be held to be a start.

If this is the case, and it must be ascertained by the Local Planning Authority, then the planning permission expired in 2020, and there is no commitment to carry the land forward

as a housing allocation. It must be noted that the figure of 79 dwellings refers only to the area of the proposed development that (previously) had the benefit of planning permission. The remaining land at the road frontage of the site and now part of the residential allocation is shown as being in separate ownership, and if developed at the same density could accommodate some 25 additional dwellings, resulting in a single site of more than 100 properties.

- c) The development company which owns this land has been advertising it for sale since at least 2015 despite stating originally that development was to start in 2017. Eight years on the market, it is all the more obvious that the gesture of an attempted “commencement” was little more than an attempt to keep the planning permission alive. The previously approved layout of this site is appallingly tight and regimented in order to maximise the number of properties on the land. There is a demand in Penygroes, but locals do not want this sort of development which is more akin to an entirely urban environment. Taking up as it does, an extremely significant percentage of the housing allocation remaining for Penygroes over the next 10 years it should be removed as a housing allocation and be replaced by several smaller sites more appropriate to the settlement.

PRc/MU1 Emlyn Brickworks

The original allocation of this site, following on from a reclamation project is fully understood. It is previously developed or “brownfield” land relatively close to the crossroads axis of Penygroes. However, the first outline planning permission on this extensive site, (E/02150) for; “reclamation of site for industrial, warehousing, commercial and residential development”, was approved on the 26th April 2000.

Subsequently, there have been several applications (all approved) for extension of time to submit approval of reserved matters, and indeed latterly for approval of some reserved matters (also all approved).

The only residential development that has actually taken place in the 23 years since outline planning permission was first granted is the construction of 9 bungalows adjacent to the northern boundary of the site, approximately 9-10 years ago.

As a third party we have no knowledge as to why there has been no further development of this site, **but**, only 9 dwellings in 23 years have been built, and it is now proposed as an allocation of 177 dwellings during the plan period 2028-2033. This appears incomprehensible to rely on a site which has shown such desperately limited progress over 23 years to supply such a huge percentage of the acknowledged requirement for Penygroes, which is obviously acknowledged as being a “growth area. In total the Development Plan allocates 293 dwellings during the plan period. However, when broken down;

37 across 4 small sites have already been constructed.

79 at the Pant y Blodau site, not 1 has been constructed in 8 years since planning permission was granted, and the site has been on the market throughout that period.

177 at the Emlyn Brickworks Site, of which 9 have been constructed in the 23 years since outline planning permission was first approved

What is extremely interesting from the above is that the four small sites have been fully built out to their capacity. This fully supports the eloquent and knowledgeable comments in this submission's supporting valuation by local estate agents Cymru Estates. As well as reflecting the views of the Planning Inspectorate in the 2013 planning appeal on the Pant y Blodau appeal, the character and nature of local residents and local people is such that they simply do not like housing estate living, much preferring the smaller developments. It is understood that on reclamation sites, particularly those in close lying Cross Hands and Gorslas, residential development has been a funding source of schemes, but when this has not been forthcoming for whatever reason then the Local Planning Authority must look to smaller, self funding sites.

There is clearly a case a case for reviewing and/or replacing/ adding to the proposed residential land allocations in Penygroes – which is clearly viewed by the Local Planning Authority as a growth settlement, and given the take -up of the four smaller local sites, popular with purchasers.

The role of the Development Plan is to provide for and meet housing needs, especially in areas of identified growth, and it is clear and obvious that if previously allocated sites are not being brought forward to meet those needs then alternative sites should be sought. For smaller settlements such as Penygroes it is surely more appropriate in terms of desirability and minimizing impact that provision should be met through several smaller developments. The candidate site put forward provides for just six, small bungalows at the heart of this linear settlement. The landowner is a local builder, and the intent would be to bring forward the site immediately using local labour and contractors.

Attached.

Candidate Site Location Plan and land in same ownership

Indicative Site Layout

Transport Statement

Biodiversity Appraisal and Checklist

Drainage Strategy and Review

Market Valuation

Marketing of Pant y Blodau (PrC3/H/23)