

Our Ref.: 1056a/RAB

Date: 26th March 2023

Forward Planning Manager
Place and Sustainability
Department of Sustainability and Infrastructure
Carmarthenshire County Council
3 Spilman Street
Carmarthen SA31 1LE

Dear Forward Planning,

**Carmarthenshire Local Development Plan 2018-2033 – Second Deposit Draft
Objection on Behalf of Mr P. Harries & Mrs J. Sainty
Land at Church Road, Gorslas**

We are instructed by Mr P. Harries & Mrs J. Sainty to make a formal representation to the “soundness” of the Second Deposit Draft of the Carmarthenshire Local Development Plan.

Our clients made a formal Candidate Site Submission in August 2018, which was referenced **SR/067/012**, seeking inclusion of their land for future residential development within the defined settlement limits of Gorslas within the Replacement Local Development Plan. The Candidate Site comprises an undeveloped field enclosure set primarily to the rear of residential properties which front the eastern flank of Church Road in Gorslas. The site has an undeveloped plot which lies between detached houses on Church Road which leads directly to the field at the rear.

We have noted that the frontage plot is included within the draft settlement limits, however the adjoining, rear field has not been included. This formal Representation relates solely to the unsuccessful part of the Candidate Site.

The Council have published a “Site Assessment Table” (January 2023) which provides details of the Council’s analysis of each received Candidate Site submission, and in the case of our clients’ submission, reasons why the site was not selected for inclusion within the draft settlement limits of Gorslas, as contained within the Second Deposit Draft. We note that the submission successfully passed through all initial stages, being Stage 1 (site compatible against the location of future growth presented in the Preferred Strategy) and Stage 2A (Initial Detailed Site Assessment). However, at Stage 2B (further detailed site assessment) of the Council’s Assessment, it was concluded that the Candidate Site was not appropriate to proceed, citing that “*There is sufficient and more suitable land available for development*”

within the area to accommodate its housing need. Development at this location may impact negatively upon the amenity of adjacent residential properties.

Our clients consider the LDP is “unsound” and should be changed, as it fails to meet the tests for “soundness”, in that the Plan “is not appropriate”, and “will not deliver”, as defined by the Planning Inspectorate’s LDP Examinations Procedural Guidance.

Specifically, our clients consider that the draft settlement limits for Gorslas, as defined under Policy SD1 “Settlement Limits”, **should be amended to include the land as edged in red upon the extract of the Proposals Map for Gorslas, as reproduced below in Figure 1. The land should be appropriately allocated for housing under Policy HOM1 “Housing Allocations.”**



Figure 1 – Extract from Draft Proposals Map with Representation site edged in red

This formal representation letter supplements the following documents which comprise a complete submission to the Second Deposit Draft Consultation stage:

- Completed Deposit LDP Representation Form
- Completed Sustainability Appraisal form

Response to Council’s Reasons for Non-Inclusion of Site within Settlement Limits

1.0 Overall Housing Supply at Cross Hands / Ammanford with Deposit Draft

1.1 The Council consider that the only reason for the Candidate Site at Church Road not being included within the draft Plan as a Residential Allocation is that they believe that **there are sufficient residential sites allocated elsewhere in the settlement.** On this basis, it must be accepted that the form of the Candidate Site set to the rear of established properties which front Church Road, together with the proposals to

utilise the existing vehicular access (subject to appropriate widening and junction alignment) is deemed acceptable, and in accord with the spatial form and character of the settlement.

- 1.2 The proposals under this Representation merely seek the addition of circa 6 residential units to the overall housing supply of Gorslas, which forms part of the principal service centre of Cross Hands, and within the Ammanford / Cross Hands Cluster as defined within the draft LDP. Figure 2 below provides an extract of the indicative site layout plan for this Representation site.



Figure 2 – Indicative Site Layout Plan of Representation Site

- 1.3 The Ammanford / Cross Hands Cluster aims to provide an additional **1267** residential units over the Plan period to 2033, and thus the addition of an allocated site of **only 6** units will not lead to an over-supply of dwellinghouses within the Cluster.
- 1.4 Only one site is allocated within the draft settlement limits of Gorslas, that being Site PrC3/h18 “Land adjacent to Brynlluan”. That site is expected to provide for 29 units. It is considered that the settlement of the scale of Gorslas is highly sustainable given its close proximity to Cross Hands and its wealth of retail, employment and community facilities. The addition of only one modest site in the village will not bring enough housing for the remainder of the new Plan Period. The addition of one further, very

modestly sized site of only 6 units will not place a burden on facilities, not the semi-rural backdrop to the settlement.

- 1.5 We have examined and researched sites which have been brought forward as Residential Allocations with the Second Deposit Draft. On behalf of clients in this LDP Cluster, we have made formal Representations seeking the omission of the following draft Allocations:

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.

- 1.6 **Site PrC3/h22 Land at Pant-y-Blodau in Penygroes for 79 units.**

The site was allocated as GA3/h35 in the Adopted 2014 LDP for 90 units. Planning Permission was granted in April 2015, and yet some 8 years later, no work has been undertaken on the site, and the land remains undeveloped. No indication is provided within the Site Assessment Report (January 2023) as to why the Council consider this long-standing allocation to remain in the Plan?

- 1.7 We submit that the draft allocations at Tirychen and Pantyblodau be omitted from the Plan, and that housing allocations be redistributed to modest Candidate Sites, of up to 10 units such as that proposed at Church Road. There is clear evidence in Gorslas, Cefneithin and Drefach that such modest sites are far more likely to be brought forward and developed in full by regional and small housebuilders given that

construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.

- 1.8 In the case of Church Road, there are little signs within the immediate locality of properties for second sale, and no evidence of undeveloped land available within this part of the settlement limits, which is a strong indicator of a healthy property market at Gorslas. Consequently, it is a location where housing proposals are **deliverable, assisting to meet housing needs** in this part of Cross Hands.

2.0 Proximity to Neighbouring Properties

- 2.1 This Representation to the Second Deposit Draft of the Revised LDP has sought to examine the Council's reasons for non-inclusion of a Candidate Site. Our clients have illustrated that their indicative proposals to construct circa 6 dwellinghouses as a sensitive small development will not appear at odds to the prevailing spatial pattern of development in Gorslas. The Council's assessment conclusion that "*Development at this location may impact negatively upon the amenity of adjacent residential properties*" is without foundation, and completely contradictory. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, especially opposite, off the western flank of Church Road, which in turn, advocates that the form of development proposed off the eastern flank of Church Road is no different, resulting in it being respectful to the character and setting of the locality. The indicative site layout plan illustrates that new dwellings can be positioned to remain at a healthy and commensurate habitable distance from existing neighbouring properties backing on to the site from Church Road.

We respectfully request that this Representation be given careful examination, and consequently the defined settlement limits of this part of Gorslas realigned to include the Representation Site, as a Residential Allocation in the Proposals Map of the adopted Local Development Plan.

Yours sincerely,



Richard A. Banks
Director

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Cc client