

Our Ref.: 1594a/RAB

Date: 29<sup>th</sup> March 2023

Forward Planning Manager  
Place & Sustainability  
Department of Sustainability & 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 Nisa Local Drefach Limited  
Land at Maesygwern, Heol Caegwyn, Drefach, Llanelli**

We are instructed by Nisa Local Drefach Limited 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/049/019**, seeking inclusion of their land for future residential development within the defined settlement limits of Drefach within the Replacement Local Development Plan. The Site off Heol Caegwyn comprises an industrial warehousing yard which is set at a backland position off the eastern flank of Heol Caegwyn. The site is odd in that it forms a commercial property which has residential development set immediately adjoining along the frontage of Heol Caegwyn, with the rear garden boundaries of those properties sharing a common boundary of some 113 metres with the industrial yard.

Planning permission has been sought to demolish the warehousing buildings on the site and construct detached and semi-detached dwellinghouses across the central swath of the yard. The rear boundary of the yard takes the form of a linear hedgerow established off the northern boundary of an associated yard, located directly off the rear elevations of the existing warehousing buildings.

The Candidate Site submission in August 2018 sought to include this rear yard within the draft settlement limits of the Local Development Plan. However, we note in checking the Council’s reasoning as to why they have not included this portion of the Maesygwern site that they have **incorrectly plotted** the boundaries of the Candidate Site submission. The above Candidate Site reference is shown as the majority of the warehousing yard, subject to

a current application for planning permission and does not include the rear yard, to **which the actual Candidate Site submission focussed upon.**

We have noted that the majority of the former commercial yard at Maesygwern continues to be included within the draft settlement limits of the second Draft of the LDP. However the adjoining, northern associated yard 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 Tycroes, as contained within the Second Deposit Draft. We note that the submission successfully passed through Stage 1 (site compatible against the location of future growth presented in the Preferred Strategy) and Stage 2A (Initial Detailed Site Assessment) of the Council’s site assessment.

However, it was rejected at Stage 2B (further detailed site assessment), with reasons for non-inclusion reported as follows:

*“Site to be included within the development limits to reflect the existing built form. The site will not be allocated for residential use as there are concerns regarding its deliverability.”*

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 Drefach, 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 Drefach, as reproduced below in Figure 1. The land should be appropriately allocated for housing under Policy HOM1 “Housing Allocations.”**



**Figure 1 – Extract from Second Draft Proposals Map with 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 Non-Inclusion based on Existing Built Form**

- 1.1 The Candidate Site relates to part of an industrial warehousing yard which is set at a backland position off the eastern flank of Heol Caegwyn. The site is odd in that it forms a commercial property which has residential development set immediately adjoining along the frontage of Heol Caegwyn, with the rear garden boundaries of those properties sharing a common boundary of some 113 metres with the industrial yard.
- 1.2 The warehousing yard occupies a land area of 0.6 hectares (1.5 acres) and has the benefit of two vehicular accesses, both consisting of surfaced tracks lying between established residential properties. The warehousing buildings themselves are inter-connecting but comprise three different phases of industrial sheds constructed at different periods during the use of the land for warehousing. Consequently, each building has a different floorspace, roof span, height and materials differ throughout.
- 1.3 The Candidate Site sought inclusion of the northern, rear part of the warehousing yard into the settlement limits of the Local Development Plan, with the existing buildings and sheds already included. The settlement limit runs immediately off the rear, northern elevation of those sheds leaving a yard depth of some 24 to 31 metres extending northwards to a well-defined hedgerow and part tree-lined perimeter with neighbouring grazing pasture. **That rear yard has been used in the past to externally store plant, machinery and materials, as well as park and manoeuvre vehicles.**
- 1.4 The long rear gardens of Heol Caegwyn properties extend to run parallel with the eastern boundary of the yard, which is marked by a copse of trees. The western side perimeter is marked by a mature hedgerow to open pasture beyond which extends around to the afore-mentioned long, rear perimeter.
- 1.5 The Candidate Site is actually only 0.3 hectares (0.75 acres) being the remaining rear yard and is identified by being edged in red on the plans below. Plan A illustrates their wider position with the settlement of Drefach, whilst Plan B provides a detailed Ordnance Survey map extract with the site perimeters identified.



**Plan A – Setting of Site in wider Drefach context**

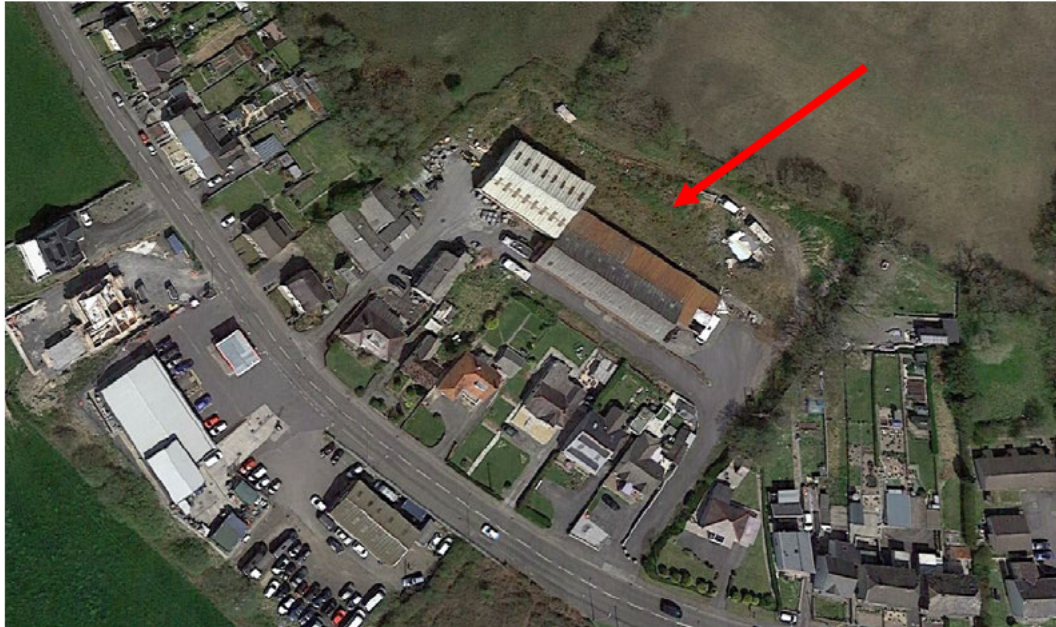


**Detailed OS Plan - Plan B**

- 1.6 The Council consider the warehousing yard as a “*site to be included within the development limits to reflect the existing built form.*” However, the setting of the limits

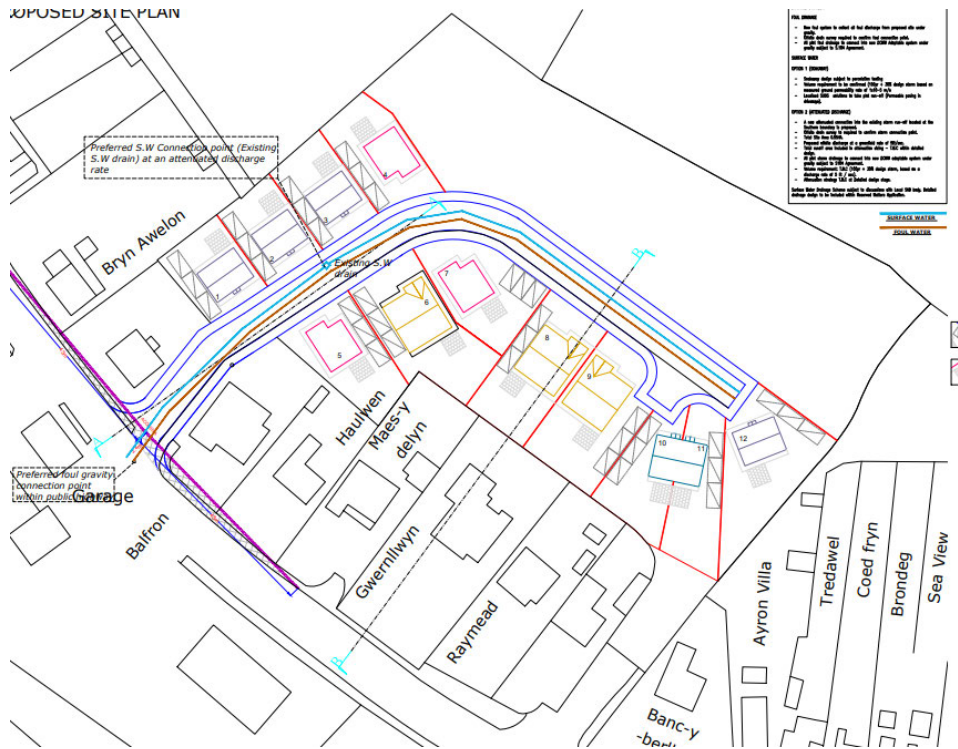
does not reflect its **existing built form** given that it does not include all of the rear yard which forms an integral and fundamental part of the site.

- 1.7 Google Earth has captured the setting and physical form of the site in that the “defensible” boundary at the site is the rear boundary fence which acts to formally define the transition from brownfield yard to agricultural enclosure and woodland.

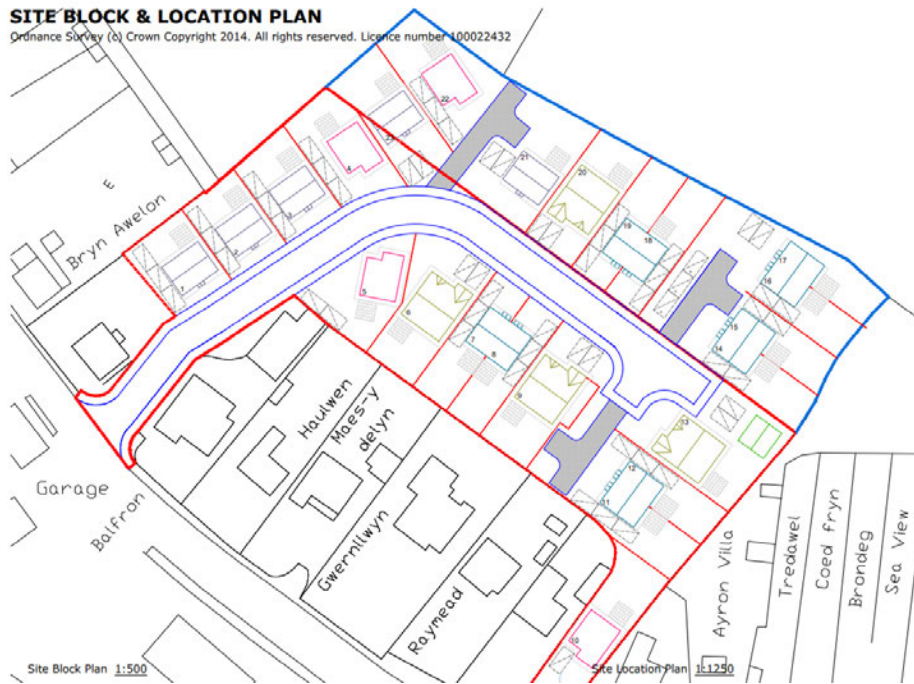


**Figure 2 - Extract from Google Earth (June 2021) illustrating extent of rear yard and northern boundary with adjoining pasture**

- 1.8 We therefore consider that the Council has adopted a **rather inconsistent approach in the spatial pattern of setting development limits**. It is abundantly clear that the warehouse as a whole is bounded by established hedgerows and individual trees. To draw an arbitrary limit across this yard is unreasonable, and prevents the logical redevelopment of this brownfield site.
- 1.9 We refer the Council to the consistent and longstanding approach held in National Planning Policy, being the overriding guidance in Planning Policy Wales that new development should also be initially steered to re-developing brownfield sites, before considering greenfield options as alternatives. To exclude the rear yard at Maesygwern is to deny the landowner the opportunity to ensure that **all brownfield development is removed** and redeveloped as a whole warehousing yard site.
- 1.10 The Candidate Site submission included a site layout plan, illustrating how the site as a whole could be developed (Figure 4 below). This should be compared to the site layout presented under Planning Permission W/35156. That application has reached a point where all consultees have no objections to the scheme to develop 12 dwellings within the existing and adopted settlement limits (Figure 3).



**Figure 3 – site layout plan as presented under Application W/35156**



**Figure 4 – Site layout plan of Representation Site, which includes whole yard site at Maesygwern**

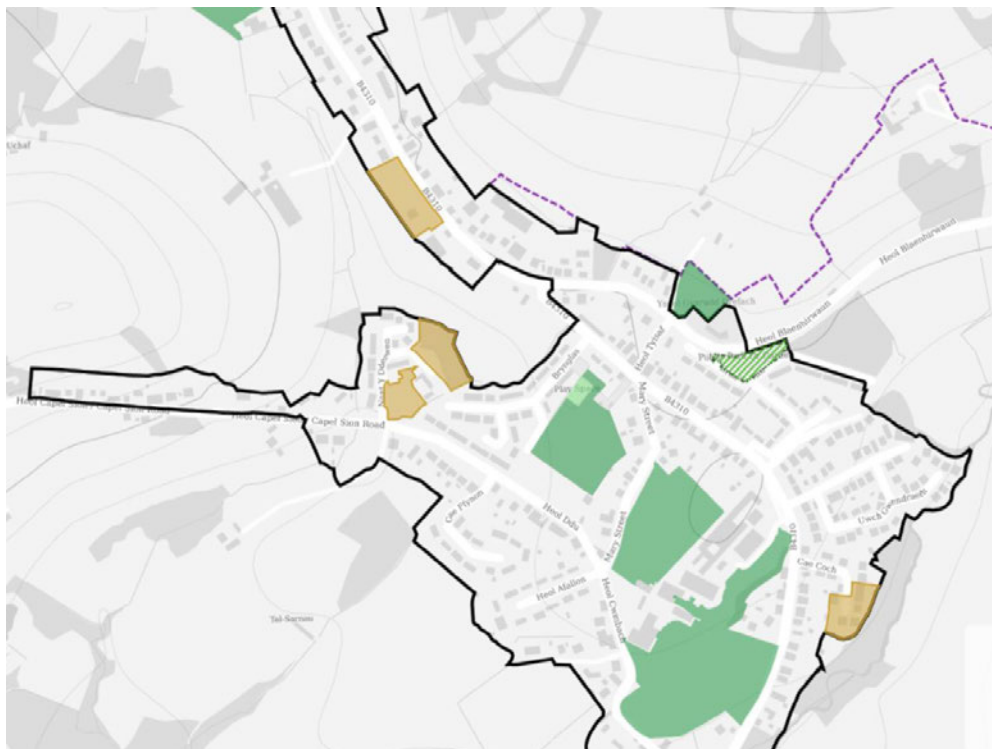
1.10 The above site layout plans illustrate that the warehousing yard could be completed as a whole off a singular access to Heol Caegwyn, and contribute a further 10 dwellinghouse, to bring the site to a combined total of 24 units.

## 2 Overall Housing Supply at Ammanford / Cross Hands with Deposit Draft

2.1 The proposals under this Representation merely seek the addition of circa 10 residential units to the overall housing supply of Ammanford / Cross Hands. Drefach forms part of the principal service centre centring upon the Ammanford / Cross Hands Cluster as defined within the draft LDP.

The Ammanford / Cross Hands Cluster aims to provide an additional **1257** residential units over the Plan period to 2033, and thus the addition of an allocated site of 10 units will not lead to an over-supply of dwellinghouses within the Cluster.

2.2 We have examined and researched sites which have been brought forward as Residential Allocations with the Deposit Draft. Only three sites are allocated for housing in Drefach, but one at Cae Coch **has already been fully completed** by Haywood Homes. Figure 5 below illustrates those three sites at Cae Coch, Nantydderwen and Heol Caegwyn.



**Figure 5 - Extract from Proposals Map indicating the three sites for housing**

Drefach (Tumble)		
PrC3/h14	*Nantydderwen	33
PrC3/h15	Land off Heol Caegwyn	7
PrC3/h16	Uwch Gwendraeth	6

**Figure 6 – HOM1 allocations in Drefach**

- 2.3 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/h14 - Nantydderwen - for 33 Units.**

The Land was allocated Carmarthenshire Unitary Development Plan (2006). No progress was made in bringing the site forward, and yet it was allocated within the Local Development Plan in 2014. Consequently, **twenty 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 Drefach area. More physically challenging sites, such as Cae Coch, Cae Pound at Cross Hands and Heol-y-Parc at Cefneithin have come forward despite topographic issues and previous ground contamination, and yet still the Council is prepared to allocate the site once again in a new Development Plan. The land is relatively level with immediate access onto the local highway network.

The decision to retain Nantydderwen after a period of 20 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.

- 2.4 **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?

- 2.5 We submit that the draft allocations at Nantydderwen and Pantyblodau be omitted from the Plan, and that housing allocations be redistributed to modest Candidate Sites, of up to 24 units such as that proposed at Maesygwern at Heol Caegwyn.

- 2.6 There is clear evidence in Drefach and Cefneithin 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.

- 2.7 In the case of Heol Caegwyn, there are little signs within the immediate locality of properties for 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 Drefach. Consequently, it is a location where housing proposals are **deliverable, assisting to meet housing needs** in this part of Ammanford / Cross Hands.

In conclusion, this Representation to the 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 24 dwellinghouses, wit 10 under this Representation as a second phase to the former commercial yard re-development will not appear at odds to the prevailing spatial pattern of development in Drefach. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, which in turn, advocates that the form of development proposed at Maesygwern is no different, resulting in it being respectful to the character and setting of the locality.

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

Yours sincerely,

A solid black rectangular box used to redact the signature of the sender.

**Richard A. Banks**  
**Director**

Enc.

Cc client