

Our Ref.: 1199.a

Date: 28<sup>th</sup> March 2023

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

Dear Sir/Madam,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft**  
**Objection on Behalf of Mr G Jones**  
**Land off Maesglas Road, Penygroes**

Further to the publication of the above document, we have been asked by our Client to review its contents, policies and proposals and advise them of any aspects we believe would unreasonably affect their aspirations and interests. In doing so, we consider that the proposed provisions of **Policy SD1** are of particular interest to our Client. As a result, we offer the following for the Council's consideration, and Inspector's in due course.

**The Site and Adjoining Area**

This submission relates to the land edged red on Plan A below.



**Plan A**

The land relates to two residential properties and their associated garden areas (circled red in Photograph 1 below), positioned to the north and south respectively of Maesglas Road, Penygroes.



**Photograph 1**

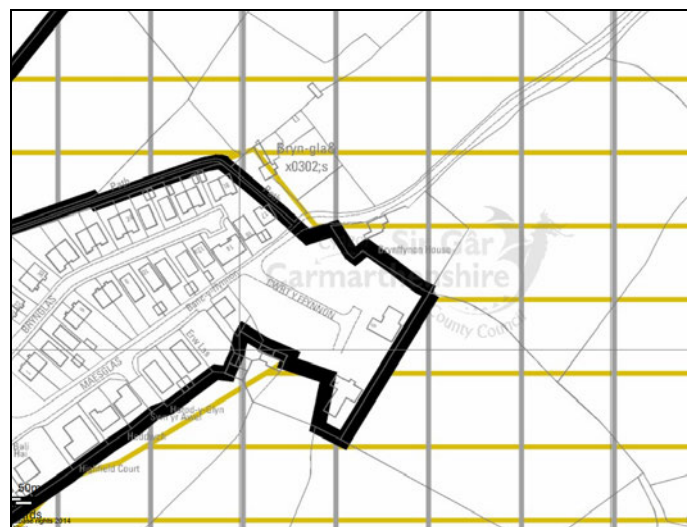
As can be seen from the photograph above, each property contains a series of outbuildings manicured lawns and ornamental plants, presenting therefore a very different appearance to the agricultural enclosures to their north and west. Both properties then gain access directly off Maesglas Road.

Immediately to the west of each property are two existing residential estates (Brynglas and Cwrt y Ffynnon), with their associated domestic curtilages. Again, the site subject of this

submission is therefore clearly more akin to the land use to its west, as opposed to that to its east.

A short distance to the west then is the core of the settlement of Penygroes, with its associated community facilities and local services and bus stops, all of which are within walking distance of the site subject of this submission.

Under the provisions of the current adopted Carmarthenshire Local Development Plan, the site adjoins, but remains outside of the currently defined development limits, as illustrated by Plan B.



**Plan B**

Having reviewed the evidence base for the current adopted LDP, it is not apparent as to why the site edged red in Plan A was excluded from the defined development limits.

### **2<sup>nd</sup> Deposit Local Development Plan**

Although no submission was made by or on behalf of our Client at the Candidate Stage for the inclusion of the land edged red in Plan A within the defined development limits for Penygroes, we understand that the Council undertook a comprehensive review of the development limits of all settlements within the County as part of its preparation of the 2<sup>nd</sup> Deposit LDP. Notwithstanding this assessment, from reviewing the Proposals Map for the 2<sup>nd</sup> Deposit LDP, the situation with regards to the land in question appears to be unchanged, as illustrated in Plan C below.



**Plan C**

As can be seen, despite the 'on-the-ground' factual situation of the land in question, it continues to be excluded from the development limits of the settlement of Penygroes.

*Consistency with Other Policies of the 2<sup>nd</sup> Deposit LDP*

The Council has provided no specific indication or guidance on how it has determined and defined development limits within the Deposit LDP. It has therefore been difficult to ascertain why some sites have been successfully included and others haven't, which is discussed further below. However, Policy HOM3 deals with small extensions to existing rural villages and so provides a useful series of criteria in determining where such extensions would be acceptable, namely the following:

- Minor infill or a small gap between the existing built form; or
- Logical extensions and/or rounding off of the development pattern that fits in with the character of the village form and landscape; or
- Conversion or the sub-division of large dwellings.

It is logical therefore that the same assessment criteria should be utilised in assessing whether or not a candidate site would make an acceptable addition to existing development limits.

Taking the land edged red in Plan A into consideration, together with the actual 'on-the-ground' physical attributes of the two residential properties in question, adjoining and nearby land and its use, it is clear that it would adhere to the second criteria listed above and so should in turn have logically been included within the defined development limits of Penygroes. Its exclusion would be inconsistent with the assessment provisions of Policy

HOM3 and indeed decisions taken by the Authority with regard to other sites within the Plan area in terms of Policy SD1. As a result and on this basis alone, the Plan as it currently stands is unsound.

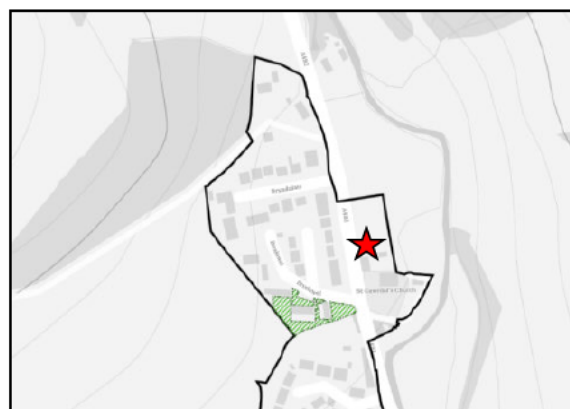
*Consistency with Other Development Limits*

Consistency in approach and application is critical in order for the planning system to be both effective and credible to all its users. Without it, the system itself becomes unsound and in the case of the determination of the development limits for Penygroes and other settlements, the Council has been found to be inconsistent.

The plans below are an extract of the 2<sup>nd</sup> Deposit LDP Proposals Maps for two areas (indicated by the red star) in the settlement of Garnant and Llanwrda.



**Plan C  
(Garnant)**



**Plan D  
(Llanwrda)**

In the case of the Garnant example, the property is a modest residential dwelling in a substantial domestic curtilage, which of course is undeveloped. The property represents the last in a line of properties, beyond to the east of which is agricultural land and so defined as 'open countryside'. The Llanwrda example is then an element of an existing larger agricultural enclosure, with two of its boundaries therefore currently undefined and so extending the existing settlement's limits beyond existing boundaries.

It should be noted that we do not object to the form of alteration to the development limits as referred to above, as it secures a varied form of available housing development opportunities for a community. However, their inclusion is in direct contrast and inconsistency to the Council's decision to exclude the land edged red on Plan A from the development limits, which consists of existing residential properties. The exclusion of it would therefore represent a clear inconsistency in approach taken by the Council, resulting in the Plan as it stands being unsound.

In conclusion, this representation to the 2<sup>nd</sup> Deposit Draft of the Revised LDP has sought to assess the suitability of the inclusion of the land edged red on Plan A, based on the current provisions of the Plan and its decisions taken with respect to similar circumstances elsewhere. In conclusions, it has successfully highlighted that its continued exclusion would represent a dangerous inconsistency.

We therefore respectfully request that this Representation be given careful examination, and consequently the land in question be included within the defined development limits as part of the Carmarthenshire Local Development Plan to ensure that the document passes all the relevant tests of soundness.

Yours sincerely,

A solid black rectangular box used to redact the signature of Jason D Evans.

**Jason D Evans**

**Director**