

Our Ref.: 1077a/RAB

Date: 3rd April 2023

Forward Planning Manager
Place & Sustainability
Sustainability & Infrastructure Department
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. G. Lewis
Land rear of Continental Leisure Vehicles, Heol Parc Mawr, Cross Hands**

We are instructed by Mr. G. Lewis to make a formal representation to the “soundness” of the Deposit Draft of the Carmarthenshire Local Development Plan.

Our clients made a formal Candidate Site Submission in August 2018, which was referenced **SR/031/002**, seeking inclusion of their land for future residential and **employment** development within the defined settlement limits of Cross Hands within the Replacement Local Development Plan.

The Candidate Site comprises an undeveloped field enclosure set off the rear of a newly formed operational yard at the rear of Continental Leisure Vehicles showrooms and service garage at Heol Parc Mawr, upon the Cross Hands Business Park.

The Candidate Site aims to expand off the recently laid surfaced yard and expand the range of employment opportunities in a north-east direction over undulated scrub land which eventually reaches several hundred metres distant at the common rear boundary of residential properties at Black Lion Road in Gorslas.

The 2018 Candidate Site proposed a mixed use of both employment and residential, with both zones of use achieving vehicular access off the adjacent Cross Hands East Strategic Employment Site (CHESSES), via an extension of an estate road currently under formation as part of the Phase 2 development of that neighbouring Council-owned 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 Cross Hands, as contained within the Deposit Draft.

We note that the submission successfully passed through the initial Assessment 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, it did not proceed past Stage 2b (Further Detailed Site Assessment) of the Council's site assessment. The Council have published reasons for non-inclusion, which are reported as follows:

There is sufficient and more suitable land available elsewhere in Cross Hands to meet its housing and employment needs. There may also be issues with the compatibility of both land uses being located in such close proximity and the proposal could impact upon the amenity of residential development.

Our clients have decided to review matters considering the above reasoning and concluded to **remove the element of residential development from the proposed scheme**. Consequently, they only now seek inclusion of land for **employment purposes only** within the Deposit Draft of the LDP.

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 Second draft settlement limits for Cross Hands, 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 Cross Hands as reproduced below in Figure 1. The land should be allocated for Employment under Policy SP6 “Employment & The Economy” and EME3 “Employment Proposals on Allocated Sites.”**

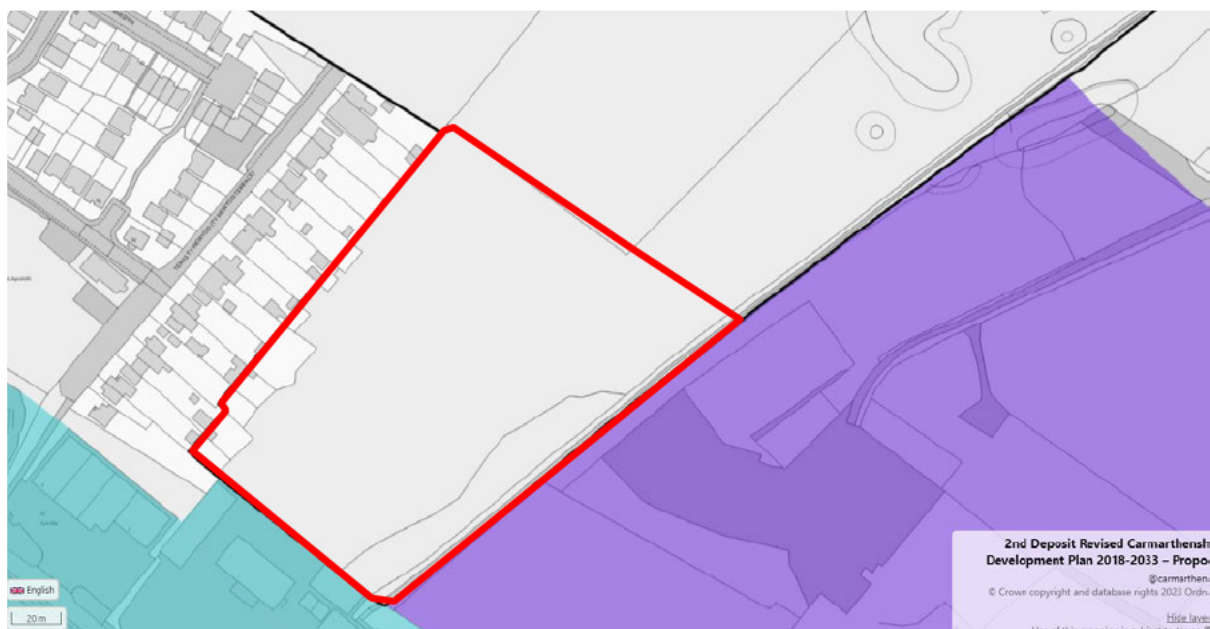


Figure 1 – Extract from Proposals Map with Representation site edged in red

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
- Location and Indicative Site Layout Plan

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

1.0 Availability of Employment Land at Cross Hands

- 1.1 The Council consider that the only reason for the Candidate Site off Heol Parc Mawr not being included within the draft Plan as an Employment Allocation is that they believe that sufficient employment land is already available at Cross Hands to meet future needs.
- 1.2 The proposals under this Representation seek the addition of circa 2.0 hectares (4.8 acres) of employment land to provide starter workshops and modest office space, for which there is a dearth of available opportunities in the settlement. Cross Hands forms a Principal Centre, being part of 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, which as clarified above **now only includes for Employment Provision.**

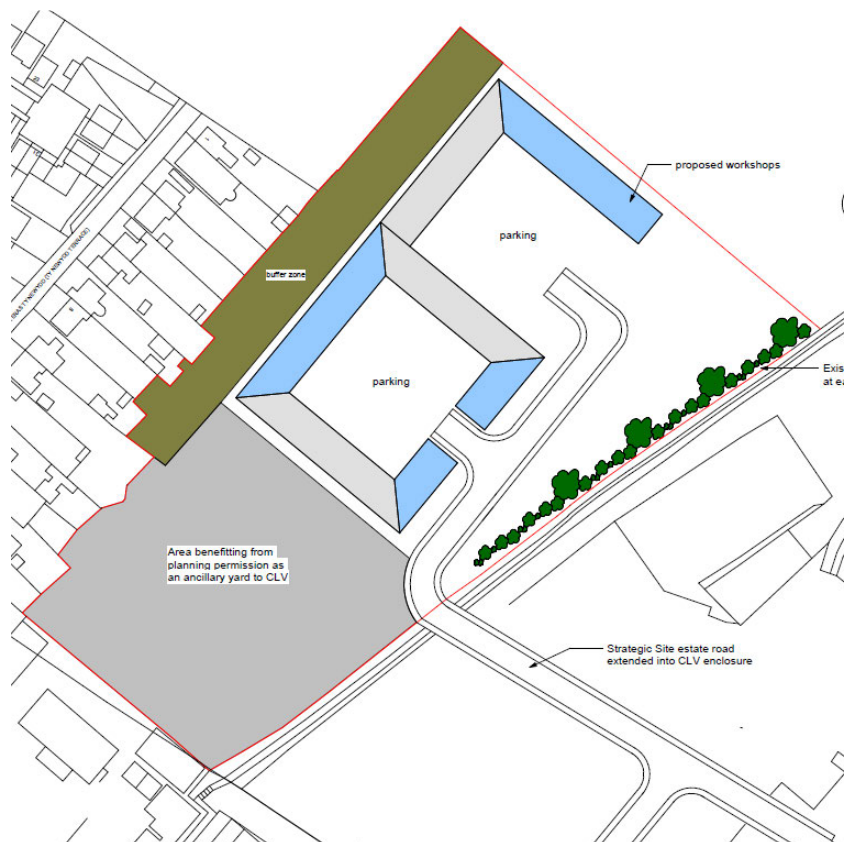


Figure 2 – Indicative Site Layout plan of Representation Site

- 1.3 The Cross Hands Cluster aims to provide Employment Land across a wide area, but principally at Cross Hands East – Sites PrC3/E1 for 8 hectares and Cross Hands West Food Park (PrC3/E2) for 7 hectares. A further 4.7 hectares is said to be available at Cross Hands Business Park (Site PrC3/E3). Policy EME3 is reproduced below in relation to Cross Hands sites:

PrC3/E1	Cross Hands East	Ammanford / Cross Hands	B1,B8	8.31
PrC3/E2	Cross Hands West Food Park	Ammanford / Cross Hands	B1,B2,B8	5.647
PrC3/E2(i)	Land west of Castell Howell			1
PrC3/E2(ii)	Land south of Heol Parc Mawr			2.712
PrC3/E2(iii)	Land north of Dunbia			1.935
PrC3/E3	Cross Hands Business Park	Ammanford / Cross Hands	B1,B2,B8	4.76
PrC3/E3 (i)	Heol Stanllyd (West)			2
PrC3/E3 (ii)	Heol Stanllyd (South)			2.156
PrC3/E3 (iii)	Heol Stanllyd (East)			0.604

Figure 3 – Sites Allocated for Employment under Policy EME3

The Council's reasoning implies that Cross Hands is awash with employment land opportunities. However, we submit that not all employment opportunities require large serviced development plateaus as has been created at Cross Hands West Food Park, and privately off Heol Stanllyd. Those sites are available for large scale new industrial units, geared to a single user. This theme is also being promoted at Cross Hands East, although the Council are being selective as to the type of employment uses permissible upon that half-completed site. The Council seek Research & Development, hi-technology and high specification engineering operations. Those uses have been slow in coming forward at Cross Hands East.

- 1.4 What is immediately apparent at Cross Hands is the lack of opportunities for small to medium sized businesses to secure business premises, be that workshops, office units and modest warehousing units. This is notable at the Cross Hands Business Workshops, which are owned by the Council, but have remained at capacity with no vacancies for the last few years. Acer Court at Heol Parc Mawr is also full of tenants, as is Llys-y-Barced, the modern offices at the south-eastern side of Heol Parc Mawr.

- 1.5 The Business Park has no available ready-to-let serviced workshops or units, which in any event would not appear suitable on the large Strategic Employment Sites located either side of the A48 trunk road.
- 1.6 The Candidate Site is not requesting a large-scale employment designation, as the site is constrained by housing to its western flank at Ty Newydd Terrace, and by mature vegetation along its entire eastern perimeter which is acknowledged must be preserved for ecological connectivity reasons. Nevertheless, it could provide for a modest employment courtyard to serve start-ups and local business partnerships during the Plan period. Access to the workshop courtyard could be easily achieved via the new CHESSES estate road which has completed partial construction as part of Phase 2 of that neighbouring development.
- 1.7 **Alternatively, the site can be accessed directly through the rear service yard of Continental Leisure Vehicles.** That business has implemented planning permissions to expand external yard space to the north of the existing showrooms and workshops off Heol Parc Mawr. The site also has the benefit of planning permission to form an estate road in parallel with the western side perimeter of CLV from a reorganised vehicular access off Heol Parc Mawr, and into the rear yard. Planning permission W/00348 was granted on 30th September 2021 and the approved site layout plan is reproduced below at Figure 4 below. The proposals involve the relocation of a detached workshop from the existing footprint off the western side perimeter to a new location within the existing rear yard.

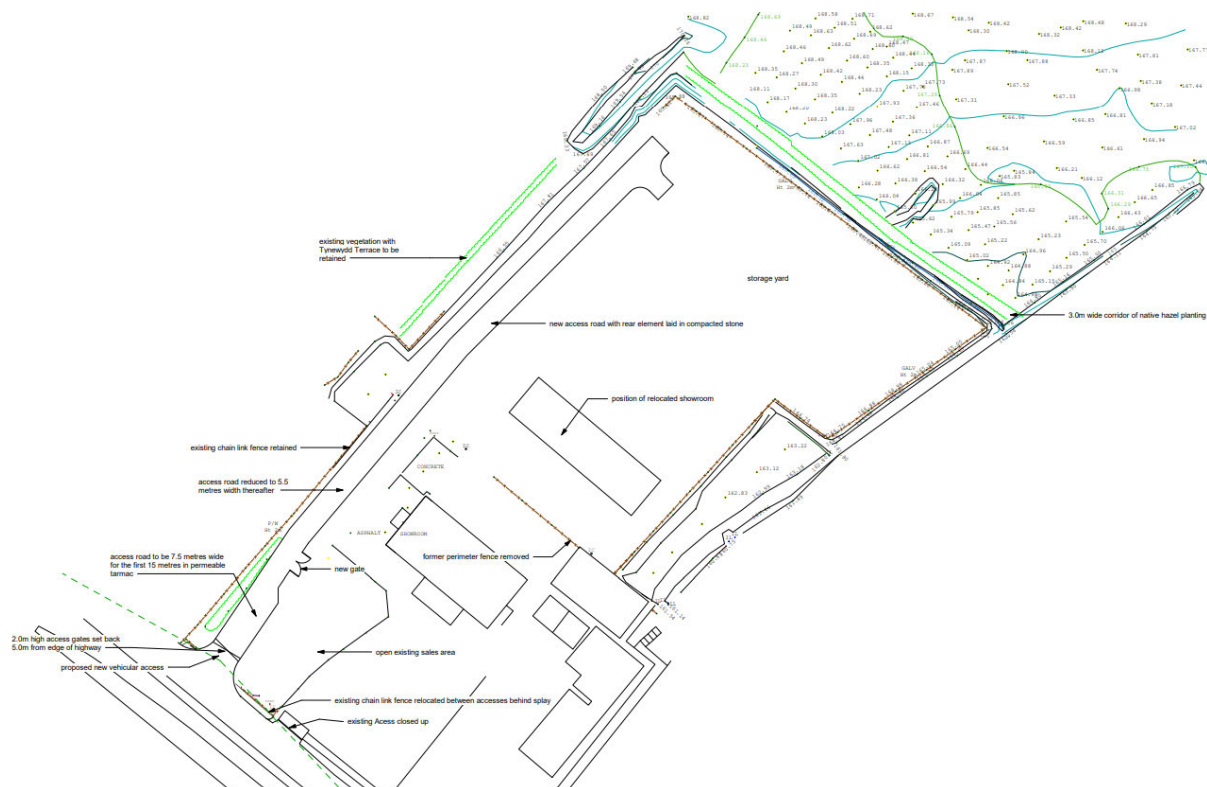


Figure 4 – approved site layout to Planning Permission PL/00348

2.0 Extension of Existing Planning Permission

- 2.1 The south-western part of the Candidate Site to the immediate rear of the Continental Leisure Vehicles showrooms and outbuildings has the benefit of planning permission to form extension yards over generally level ground. The operational yard is geared to park and store leisure vehicles, with the front forecourt to the Heol Parc Mawr road frontage continuing to be used as an external display area.

Figure 5 below illustrates the site layout visible from Google Earth, and the parking of commercial vehicles spread over a large, surfaced area.



Figure 5 – Google Earth – April 2021 – illustrating extent of surfaced works at rear of CLV

- 2.2 Consequently, the area and ground has already been predominately established with new commercial uses, allied to the existing business. This could be expanded to allow for a courtyard of workshops and office units, which remain separated from residential properties at Heol Parc Mawr by a landscaped buffer zone. **Future conditions could be imposed upon users of the units as to hours of operation, and specific uses as not posing any noise, emissions in terms of dust / air quality and environmental safeguards.**
- 2.3 A new modestly-sized employment site providing for start-ups and smaller businesses, but directly linked to existing business parks, is therefore required, and the Candidate Site provides an excellent Alternative example of a desired site.

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 significantly revised their indicative proposals to omit any residential element and **concentrate solely on proposals to construct a courtyard of office and workshops will not appear at odds to the prevailing spatial pattern of development in Cross Hands.** The locality has established examples of workshop units which are all at capacity, and in active use which in turn, advocates that the form of development proposed off Heol Parc Mawr is sought after and in demand, and is accordingly, 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 Cross Hands realigned to include the Representation Site, as an Employment Allocation in the Proposals Map of the adopted Local Development Plan.

Yours sincerely,

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

Richard A. Banks
Director

Enc.

Cc client