

Our Ref.: 1190g/RAB

Date: 31<sup>st</sup> March 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 NBA Developments Limited  
Land part of Tirlan Farm, Off Bethania Road, Upper Tumble**

We are instructed by NBA Developments Limited to make a formal representation to the “soundness” of the Second Deposit Draft of the Carmarthenshire Local Development Plan.

Our clients own an agricultural holding which is set to the rear of residential properties and fronting the southern flank of Bethania Road, on the eastern edge of Upper Tumble. The land comprises low-grade, rough pasture which also borders detached and semi-detached housing which are orientated to front that highway. Our clients are currently redeveloping the Tirlan Farmyard with four dwellinghouses, which are being constructed in place of former agricultural outbuildings which lie off the near side of highway.

Our client's land interests at the eastern edge of Upper Tumble benefit from an edge-of settlement location, immediately adjoining established housing, and set only 200 metres from established semi-detached housing which marks the western edge of Cross Hands. Tirlan Farm includes two open field enclosures which have their highest point fronting the A476 Bethania Road, before falling southwards to other farm properties east of Tumble.

The Tirlan Farm site lies within walking distance of the settlement's community facilities, including convenience shops, primary school, a medical surgery and pharmacy, and regular public bus service between Cross Hands and Llanelli. It can be regarded as **inclusive** within the settlement form.

Our client therefore seeks inclusion of their land as an **Alternative Site** for a future **Residential development** within the defined settlement limits of Upper Tumble within the Replacement Local Development Plan.

The Site comprises a single rectangular-shaped field frontage, and generally level to gently sloping grazing field set off the immediate southern flank of Bethania Road. The field is marked by a roadside hedgerow which extends the field length, but is punctured by an agricultural access gateway, from where an unmade farm track leads off to a recently completed agricultural outbuilding set in the eastern field of Tirlan. The Representation Site is currently being used as a contractors' storage area as the four houses at Tirlan are being constructed. Figure 1 below provides a Google Earth image of the site, whilst Figure 2 provides a detailed Ordnance Survey map extract of the site.



**Figure 1 – Google Earth – April 2021 – of Representation Site**

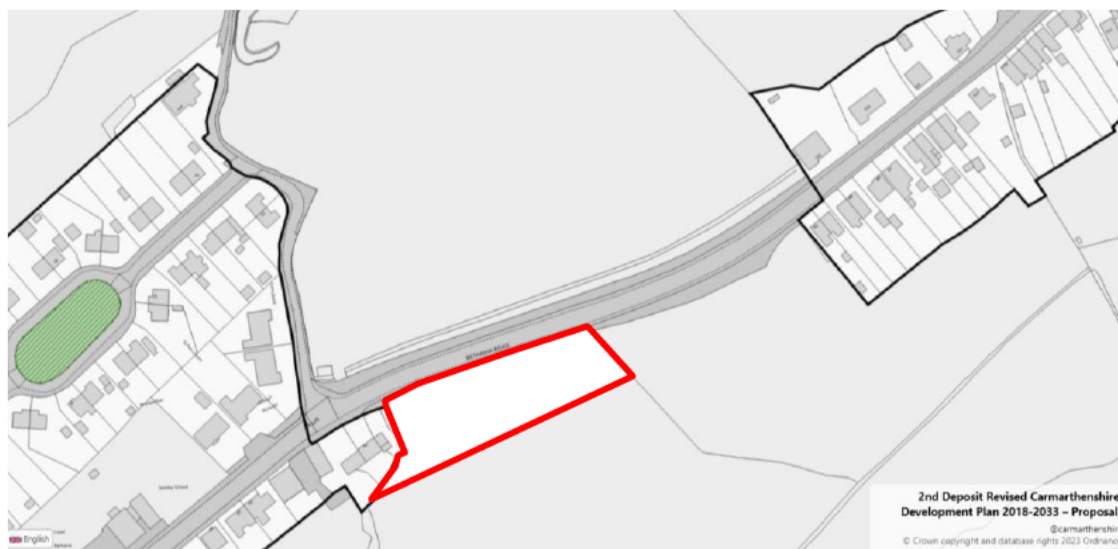


**Figure 2 – Ordnance Survey Map extract of Representation Site**

We have noted that the draft settlement limits have been wrapped around the former Tirlan Farm yard, before crossing to established development off the northern flank of Bethania Road, in the form of Llechyfedach. That estate is predominately local-authority-built in origin, but with a small grouping of three modern bungalows about its junction with Bethania Road.

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 Upper Tumble, 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 Upper Tumble, as reproduced below in Figure 3. The land should be appropriately allocated for Housing under Policy HOM1.**



**Figure 3 – 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 plan and Indicative Masterplan

## **Reasons for Allocation as Residential Development within Settlement Limits**

### **1.0 Position within Residential Setting at Bethania Road**

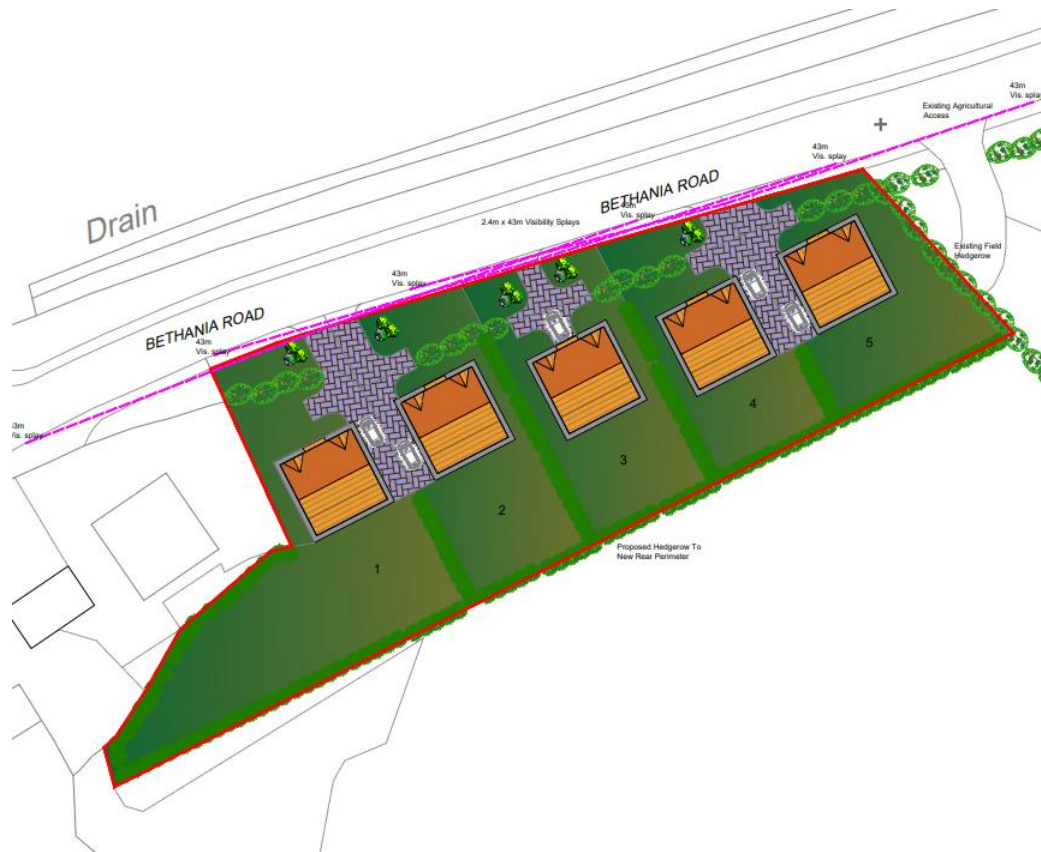
- 1.1 The Council within the Settlement Framework of the LDP, have categorised Upper Tumble as part of the Cross Hands / Ammanford Principal Service Centre, given it lies only one kilometre from Cross hands town centre, and its range of extensive employment, retail and community facilities and has good public transport links to the nearby Principal Service Centres of Ammanford and Llanelli. In such circumstances, the introduction of a modest residential allocation to the edge of Upper Tumble certainly meets the spatial criteria for locating new dwellings as part of the settlement form.
- 1.2 In terms of its physical location, the Representation Site is flanked on one side by residential development being the redevelopment of the Tirlan Farmyard, the site layout plan for which is reproduced below as Figure 4. The adjoining field enclosure extends over a field frontage of some 95 metres and terminates at an established mature field hedgerow which separates it from the eastern field at this part of the farm holding.
- 1.3 Bethania Road itself continues from this point for only a few hundred metres to join Heol Bryngwili and the range of community facilities at nearby Cross Hands including public bus stops. In the context, the site **is directly related to the settlement, with proposed occupants able to easily access facilities and public transport.** Consequently, the proposals would meet the relevant initial criteria of the Policy SP16 where new residential development should seek to be placed in sustainable locations, accessible on foot / cycle to the settlement's range of community and commercial facilities and services.



**Figure 4 – redevelopment of Tirlan Farmyard currently under construction**

## **2.0 Representation Site Proposals**

- 2.1 This submission is accompanied by an Indicative site layout plan which indicates an indicative setting for a frontage of detached, two-storey dwellinghouses to be orientated to front the public highway and thus complementing the newly forming residential properties being formed at Tirlan, and also orientated to front Bethania Road. Figure 5 below provides a reproduction of that Plan which seeks to provide paired accesses onto the A476 road, and dwellings set back to allow for adequate parking and turning facilities. Traditional rear gardens of a minimum of 10 metres depth would be typically arranged, with the rear perimeter of the site denoted with new hedgerow planting.



**Figure 5 – Indicative Site Layout Proposals**

- 2.2 The Representation proposals would ensure that massing of scale was sensitively designed with buildings not rising to more than two storeys. The development of the field frontage will necessitate partial re-modelling of ground levels of the field when forming access driveways. However, the footprints of the proposed dwellings themselves would be sited upon a plateau in the enclosure, so that new development would correspond to the ground levels of adjoining Tirlan Farm properties, as shown in the photographs below.



**Photo 1 – view looking west along Bethania Road with field frontage to left and established agricultural access to the farm holding**



**Photo 2 – view eastwards along public highway with new residential construction evident and immediately adjoining the Representation Site**



**Photo 3 – the site has limited ecological value being semi-improved grassland**

### 3.0 Sustainable Location

3.1 The Site at Bethania Road lies off a public highway which extends as a principal distributor road between Upper tumble and Cross Hands. Public bus stops lie only some 300 metres distant from the site access at Llechyfedach School. Main public bus services call at these bus stops, and in particular:

- Service 128 – Llanelli to Ammanford, via Llannon and Tumble
- Service 129 – Ammanford to Carmarthen via Tumble and Cross Hands

3.2 Strategic Industrial Estates at Cross Hands are a 15 minutes' walk from the Site, or 5 minutes by bus.

3.3 The Alternative Site lies within a 3 minutes' walk of Llechyfedach Primary School which is located further west along Bethania Road. Ysgol Cwm Gwendreath lies a 10 minutes' walk in the opposite direction through Cross Hands.

Tumble contains a post office, range of convenience stores, hot food take-aways, medical surgery, pharmacy, play facilities, community hall, public houses and cafés.

3.4 Cross Hands centre provides a whole range of large food supermarkets, comparison shops, public houses / cafes, offices, industrial estates and leisure / recreation facilities.

Figure 6 below provides an indication of the proximity of the Alternative site to Tumble village centre at Heol-y-Bryn, and nearby Cross Hands town centre and Business Park and strategic road network.

The red star denotes the position of the Representation Site.



**Figure 6 – proximity of Site to Tumble village centre, Cross Hands town centre and major road network**



## 4.0 INFRASTRUCTURE CONSIDERATIONS

- 4.1 Development of the Alternative Site for residential units would be served by mains water, gas, public sewer and electricity connections, which lie within the adjoining stretch of Bethania Road.
- 4.2 The public highway itself is equipped with roadside gullies and drainage which aid to discharge run-off from the extended carriageway. The Site comprises of former agricultural pasture. There are no areas of water-logging evident, and therefore at first inspection, it appears that the site benefits from good ground percolation of rainwater and discharge to existing perimeter drainage ditches. Soakaways would be the most sustainable means of disposing of surface water from individual buildings. If required, attenuation measures can be deployed on site to control surface water run-off during extreme storm events, which could also allow for additional capacity, making allowances for climate change. The field enclosures are served by a series of drainage ditches along the field's boundaries, which eventually combine and inter-connect discharging surface water to minor watercourses flowing eventually to discharge into the River Gwili. It is considered that as a result of on-site features, there would be several options available to a future development of the site in terms of surface water disposal.
- 4.3 We have also referred to The Coal Authority Map detailing "Development High Risk Areas" and the location of historic mine entries. Figure 7 below is an extract from that map, and which confirms that the site lies close to two seams of coal, however, the road frontage appears **free from any mining legacy**.

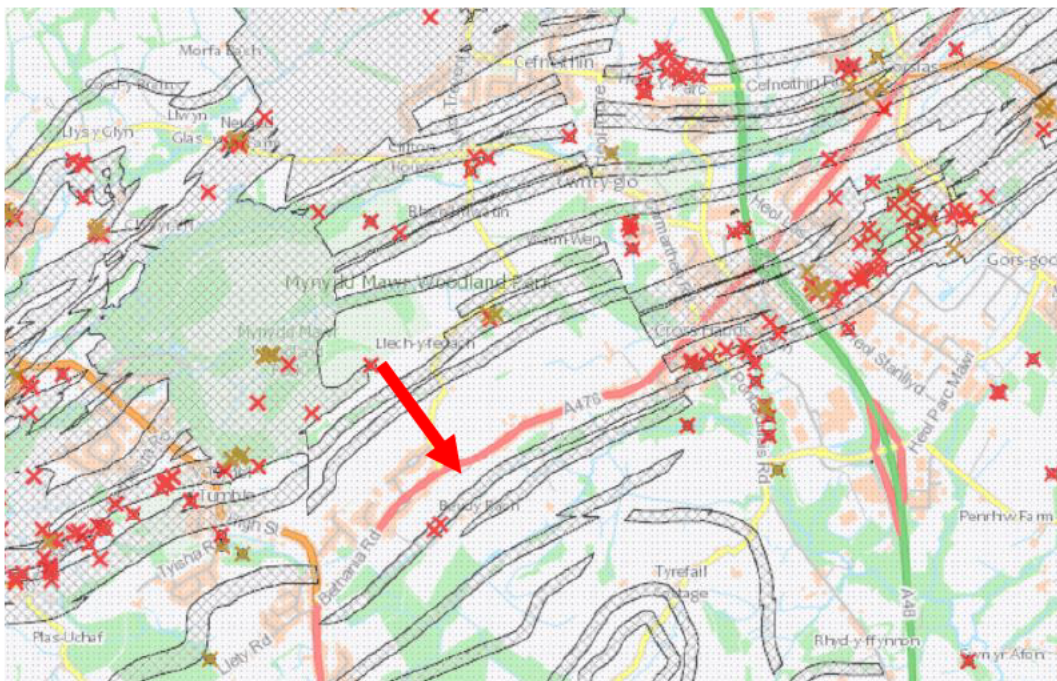


Figure 7 – extract from Coal Authority interactive map with site highlighted

## 5.0 Housing Land Availability in Tumble

5.1 Despite being part of the Cross Hands Principal Service Centre Cluster, Policy HOM1 indicates only two sites allocated for housing in the whole of Tumble. An extract from that HOM1 schedule is reproduced below.

Tumble		
PrC3/h28	Land at Factory site between No. 22 & 28 Bethesda Road	30
PrC3/h29	Central Garage	24

**Figure 7 – Housing Allocations at Tumble**

5.2 The re-development at the former central Garage **have already been completed by NBA Developments**, whilst the site at Bethesda Road has lain undeveloped since demolition of the commercial unit was completed several years ago. Therefore, for a settlement with several thousand residents, there are no modestly sized residential development opportunities. The development of the Alternative Site for only five additional dwellings will not place any burden whatsoever, or indeed compromise housing land supply.

## 6.0 Conclusion

6.1 This Representation to the Second Deposit Draft of the Revised LDP has sought to promote the inclusion of an **Alternative Housing allocation** on land off Bethania Road in Upper Tumble.

6.2 Our client has illustrated that their indicative proposals to develop a small site of frontage dwellings to complement that currently in existence adjoining at the farmyard redevelopment on the adjoining section of road frontage. Accordingly, the development of the field frontage with five detached dwellinghouses will not appear at odds to the prevailing spatial pattern of development in Tumble. The locality has numerous examples of modern frontage development being completed at edge of settlement locations, which in turn, advocates that the form of development proposed for modest housing numbers is no different, resulting in it being respectful to the character and setting of the locality.

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

Yours sincerely,



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

Enc.

Cc client