



REPRESENTATION STATEMENT

2nd DEPOSIT CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN
2018-2033

**OBJECTION TO THE LACK OF
DEVELOPMENT LIMITS/EXCLUSION OF LAND
AT
LLANDDAROG ROAD, LLANDDAROG, SA32 8AJ**

on behalf of

Mr. R. Moses

Our Ref: 0406.b/CLJ/23

Date: March 2023

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OBJECTION STATEMENT: OVERVIEW

This statement is submitted as an objection to the 2nd Deposit Carmarthenshire Local Development Plan (LDP) and has been prepared in respect of an area of land at Llanddarog Road, Llanddarog, be identified for residential development and that this long-established cluster of dwellings be afforded development limits and recognised as an outlier to the Tier 3 Sustainable Village of Llanddarog.

The inclusion of this land within the development limits for Llanddarog would contribute to the overall strategic aims and objectives of the LDP, as well as contributing to the sustainable housing resource for the benefit of the local community. The economy of the proposed outlier is underpinned by an expanding and successful equine breeding business which will provide employment opportunities.

This submission requests that the plan be revised to include this outlying residential cluster as part of Llanddarog's development limits and thus provide for the future housing needs of the local area.

1.0 INTRODUCTION

- 1.0.1 JCR Planning Ltd. has been instructed by Mr. R. Moses (the landowner) to prepare an objection representation in respect of an area of land at Llanddarog Road, Llanddarog. The purpose of the submission is to seek the designation of development limits for this long-established cluster of dwellings and that it be recognised as an outlier to the Tier 3 Sustainable Village of Llanddarog in the forthcoming replacement Carmarthenshire Local Development Plan (2018 – 2033).
- 1.0.2 This submission has been prepared in accordance with the Local Authority's Revised Carmarthenshire Local Development Plan published guidance documents. The contents of this submission therefore address the relevant criteria within these documents, thus allowing a considered determination and evaluation.
- 1.0.3 Recognition has also been given to ensuring that this formal submission complies with the guidance and requirements of Planning Policy Wales and associated Technical Advice Notes, and other advisory guidelines issued by the Welsh Government.
- 1.0.4 This submission provides a comprehensive case for the allocation of the objection site for residential development purposes and outlying development limits and should be considered in conjunction with the accompanying submitted illustrative site plan.
- 1.0.5 In order to assist the Local Planning Authority in its deliberations, JCR Planning is prepared to supply any additional information that may be required and to arrange for a site inspection if deemed necessary.
- 1.0.6 A red line identifies the spatial extent of the objection outlier site in *Figure 1*.



Fig. 1 – Objection site boundary

2.0 SITE CONTEXT

2.1 THE OBJECTION SITE

2.1.1 The location of the objection site ('Llanddarog Road') is indicated in the 'Ordnance Survey' extract at *Figure 2*.



Fig. 2 – General location of objection outlier site

2.1.2 The objection outlier site is located immediately to the north of the A48 dual carriageway linking Carmarthen with Pont Abraham

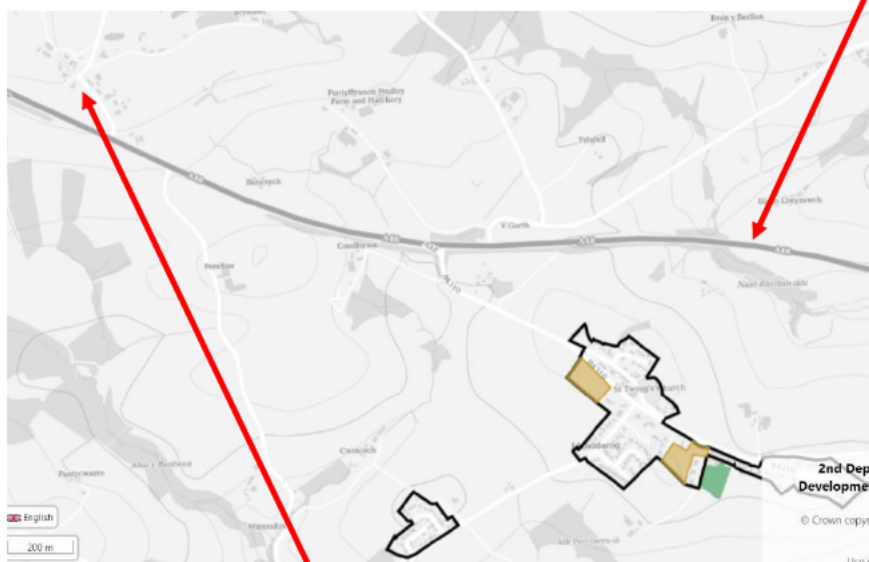


Fig. 3 – Relationship of objection site to proposed development limits for Llanddarog

2.1.3 As is evident in *Figure 3*, the precedent has already been set in respect of affording outlying clusters of dwellings development limits. The Is-y-Llan residential development, to the south-west of Llanddarog, has its own development limits.

2.1.4 Furthermore, as shown in *Figure 4*, the Pontfaen residential development, situated along the B4310 to the east of Llanddarog, also has its own development limits.



Fig. 4 – Relationship between Llanddarog and the outliers of Is-y-Llan and Pontfaen

2.1.5 Both of these outliers basically comprise a number of dwellings that have been constructed in the form of a single estate road scheme. They do not take the form of a more traditional small village type cluster and yet they have been recognised as being worthy of being afforded development limits.

2.1.6 in fact, Llanddarog Road and Pontfaen are a similar distance from the village centre. Llanddarog Road appears to be more detached purely because the old Llanddarog Road has been bisected by the A48 dual carriageway. The residents of Llanddarog Road still utilise the services and facilities of Llanddarog village, including the Church, Chapel, primary school, post office/shop and public houses/restaurants.

2.1.7 *Figure 5* provides an aerial image of the objection outlier site and its general surroundings from which Llanddarog Road's established village form is clearly evident.



Fig. 5 – Aerial view of Llanddarog Road cluster in relation to A48 junction to Llanddarog village

2.1.8 The cluster itself is characterised by a mix of residential dwelling styles including large detached single storey and large two storey detached dwellings, as shown in *Figures 6 to 9*.



Fig. 6 – General view of main section of cluster



Fig. 7 – General view of approach to cluster from the south-east and A48



Fig. 8 – General view towards a number of single storey dwellings



Fig. 9 – General view of large single storey dwelling and two storey dwelling

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- 2.1.9 Development at Llanddarog Road reflects the legacy of the incremental development that has occurred over the years. The designation of development limits would provide a degree of development certainty and would also serve to control the limited growth Llanddarog Road can accommodate rather than continued incremental ribbon development.
- 2.1.10 An important consideration in support of this submission is the existence of a flourishing equine breeding enterprise which brings investment into the county. Future opportunities for staff accommodation associated with the equine business will be severely handicapped without the designation of this outlying settlement.
- 2.1.11 In summary therefore, a clear precedent has already been set by the designation of development limits for two outliers near Llanddarog, namely, Is-y-Llan and Pontfaen. There are multiple instances of other outliers being afforded development limits elsewhere within the 2nd Deposit LDP, in which the circumstances are no different to Llandddarog Road. There is therefore no overriding reason not to designate development limits in this particular instance.

2.2 SETTLEMENT SUSTAINABILITY AND SITE SETTING WITHIN THE 2ND DEPOSIT LOCAL DEVELOPMENT PLAN

- 2.2.1 Within the 2nd Deposit LDP, the settlement of Llanddarog is categorised as a Tier 3 Sustainable Village under strategic policy SP3 'Sustainable Distribution – Settlement Framework'.
- 2.2.2 More specifically, in terms of accessibility, Llanddarog has a regular bus service (166) and is conveniently situated only approximately 5 miles from the main market town of Carmarthen and its wide range of facilities and services, including retail, secondary and tertiary education, healthcare, library, cinema, sport and recreation, and employment opportunities. Carmarthen is also a main transport hub for both bus and mainline rail services.
- 2.2.3 Llanddarog itself offers a range of services and facilities, including Church, Chapel, primary school, post office/shop and public houses/restaurants. The objection outlier is also in close proximity (0.8 miles) to the facilities at Nantycaws, namely, a restaurant/café, petrol station/shop and environmental management/recycling centre.

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- 2.2.4 The outlier at Llanddarog Road enjoys ease of access direct to the strategic highway network, joining the A48 which links with Carmarthen and Cross Hands.
- 2.2.5 The sustainable development credentials of this outlier should therefore be given full recognition and consideration in the forthcoming 2nd Deposit LDP.

3.0 NATIONAL PLANNING POLICY CONSIDERATIONS

- 3.0.1 In the preparation of a development plan, consideration must be given to national planning policy and guidance. At present, this takes the form of *Planning Policy Wales* (PPW) and a series of *Technical Advice Notes* (TANs) that deal with a range of topic areas.
- 3.0.2 With regards to residential development, the overarching requirement and principal guidance set by national policy is to provide sufficient quality housing to meet the anticipated needs of the community, including affordable dwellings. It is expected that sites should be free from planning, physical and ownership constraints, whilst also being economically feasible for development, in order to create sustainable communities. Sufficient sites need to be available for the appropriate development of a full range of dwelling types.
- 3.0.3 This formal Carmarthenshire Local Development Plan review should be aiming to assist in addressing Carmarthenshire County Council's anticipated housing need which hitherto fell significantly below the previously required 5 year supply level. Securing correct levels of sustainable housing growth can only be achieved if truly deliverable allocations are identified. Such allocations should replace many of the failing and undeliverable sites that currently form part of the Authority's housing and growth strategy for the county.
- 3.0.4 Dealing specifically with the objection outlier site, national planning policy provides authorities with more specific guidance in selecting sites for allocation for residential development and in terms of the objection site, it is considered that all relevant criteria are satisfied, including:-
- its location is sustainable in terms of proximity to a range of community facilities, local services, public transport services and employment opportunities
 - the physical and social infrastructure of the settlement is capable of accommodating appropriate development at the site without detriment to any interest
 - it is not subject to any physical constraint that would prevent its delivery
 - its development for residential purposes would be compatible with existing adjoining land uses.
- 3.0.5 PPW promotes the notion of sustainable development as being central to all planning decisions in Wales. Sustainable development is defined as development that meets

the needs of the present without compromising the ability of future generations to meet their own needs.

- 3.0.6 Similarly, in terms of providing a framework for the provision of housing, a key policy objective is to provide greater choice in the type of housing available. This fundamental ambition manifests itself through the regulatory role of the planning system, which aims to ensure that new homes are provided in the right place and at the right time.
- 3.0.7 Similarly, it has long been established that new housing developments are expected to be well-integrated with, and connected to, the existing pattern of settlements and should avoid creating a fragmented development pattern. By affording Llanddarog Road its own development limits, the incremental development that has occurred to date will be controlled.
- 3.0.8 Essentially, directing appropriate levels of new development to those locations that have ready access to a range of facilities and services, has the effect of minimising the distances between trip origin and destination, thus reducing the propensity for additional private car travel. The objection site is such a location, being situated close to public transport corridors and the strategic highway network, and being within a convenient distance of a wide range of services and facilities.
- 3.0.9 The inclusion of the objection site within outlier development limits would contain the hitherto ribbon development that has occurred and would help secure the development plan's strategic residential land supply.
- 3.0.10 In summary therefore, the designation of the objection site would adhere to and support the objectives, principles and requirements of national planning policy.

4.0 THE PROPOSAL

- 4.0.1 In order to demonstrate the suitability of the objection site for outlier residential development limits, this submission is accompanied by a location plan which incorporates suggested limits around this long-established cluster at Llanddarog Road. It should be emphasised that the accompanying plan is for illustrative purposes and other alternative development limits could also be readily produced.
- 4.0.2 Notwithstanding this, the suggested limits have taken into account all normal and relevant development control criteria and also potential, but appropriately limited, development opportunities to within the community. The following information therefore expands upon these principles.

4.1 DEVELOPMENT OVERVIEW

- 4.1.1 It is proposed that the objection outlier site be designated with development limits in the forthcoming replacement Carmarthenshire Local Development Plan. The accompanying location plan demonstrates that the Llanddarog Road outlier's designation is wholly appropriate.
- 4.1.2 The outlier is also capable of accommodating limited residential development that would reflect the existing form and density of dwellings within the cluster.
- 4.1.3 It is also acknowledged that any appropriate development could comprise affordable dwellings or an element thereof, or indeed that appropriate contributions could be made to support affordable housing provision elsewhere within the county.
- 4.1.4 The suggested limits show opportunity for an appropriate limited residential proposal to be readily accommodated within Llanddarog Road, without any environmental impact or causing harm to any third party interests.
- 4.1.5 The existence of a flourishing equine breeding enterprise that brings investment into the county is an important consideration in support of this submission. The business is expected to expand and will potentially require opportunities for staff accommodation. Unless development limits are delineated, the future prospects for this equine business will be severely hampered.

5.0 ENVIRONMENTAL CONSIDERATIONS

5.1 ECOLOGICAL ATTRIBUTES

- 5.1.1 The objection site has been assessed against a catalogue of available environmental data. DataMapWales details statutory and non-statutory national and local sites of ecological importance.
- 5.1.2 The objection outlier site does not contain any national or local nature conservation designation, with no areas of woodland in proximity.
- 5.1.3 Any biodiversity assets that may be present at or adjoining the objection outlier site will be given full consideration, including the proposed retention and management of existing boundary trees, woodland and hedgerow features, for further biodiversity gain.
- 5.1.4 The objection site is largely actively used and managed for the purposes of domestic curtilage and agriculture and therefore is subject to normal nutrient management practices.
- 5.1.5 It is considered that the designation of the objection site will not be impeded by any statutory and non-statutory environmental designations.

5.2 HISTORIC ASSETS

- 5.2.1 The objection site has been assessed for any proximity to known and designated historic assets, using DataMapWales.
- 5.2.2 The objection outlier site does not contain any listed buildings or scheduled monuments and neither is it in proximity to any historic assets.
- 5.2.3 As a result, the objection site's designation would not have any detrimental impact on the setting or interest of any nearby historical asset.

5.3 ENVIRONMENTAL CONSTRAINTS

Potential for Risk from Flooding

- 5.3.1 The objection site has been assessed against DataMapWales and the Development Advice Maps (DAM), prepared by Natural Resources Wales (NRW).



Fig. 11 – NRW DAM extract in relation to objection site

5.3.2 The above extract shows that no part of the objection outlier site is situated within any designated flood zone, and thus the potential development of the site is not compromised by either fluvial or tidal flooding.

5.3.3 An examination has also been made of DataMapWales and NRW records relating to potential surface water flooding. *Figure 12* shows an extract depicting areas of land in the locality of the objection site which are susceptible to surface water flooding. The small area of surface water flooding identified at Llanddarog Road does not compromise the outlier's designation with development limits.



Fig. 12 – DataMapWales surface water flooding extract in relation to objection site

Potential for Ground Contamination and Coal Mining Activity

- 5.3.4 Significant areas of Carmarthenshire have historically been the subject of coal mining activity. The Coal Authority records have been examined to ascertain the presence of mine entries, adits or seams of shallow coal and mine workings.
- 5.3.5 The Coal Authority's records reveal that the objection site lies outside the South Wales Coalfield area and is not affected by any past or present coal mining activity.
- 5.3.6 The objection site has no known ground stability related constraints.
- 5.3.7 The objection site has no known ground contamination related constraints.

6.0 APPRAISAL

- 6.0.1 The justification for the inclusion of the objection outlier site within designated development limits is derived from national planning policy, as well as the physical attributes and character of the site itself. The designation of Llanddarog Road would satisfy sustainability objectives and provide considerable socio-economic advantages for this long-established cluster of dwellings, not least in terms of providing development certainty for the benefit of the local community. The benefits will also accrue to the expanding equine breeding business at this location.
- 6.0.2 The objection site is historically linked with the nearby settlement of Llanddarog - categorised as a Tier 3 Sustainable Village under strategic policy SP3 'Sustainable Distribution – Settlement Framework'.
- 6.0.3 As stated, precedent has already been set in respect of affording outlying clusters of dwellings development limits. Both the Is-y-Llan and Pontfaen residential developments have their own tightly delineated development limits. Pontfaen is a comparable distance from Llanddarog village.
- 6.0.4 However, both of these outliers basically comprise single estate road schemes. They do not take the form of a more traditional small village type cluster, as is the case with Llanddarog Road, and yet they have been recognised as being worthy of being afforded development limits.
- 6.0.5 The residents of Llanddarog Road still utilise the various services and facilities of Llanddarog village, including the Church, Chapel, primary school, post office/shop and public houses/restaurants.
- 6.0.6 Llanddarog Road's incremental development has occurred over the years. Designating development limits would provide a degree of development certainty and would also serve to control the limited growth Llanddarog Road can accommodate rather than allowing continued incremental ribbon development.
- 6.0.7 In summary therefore, a clear precedent has already been set by the designation of development limits for two outliers near Llanddarog, namely, Is-y-Llan and Pontfaen. There are multiple instances of other outliers being afforded development limits elsewhere within the 2nd Deposit LDP, in which the circumstances are no different to Llandddarog Road. There is therefore no overriding reason not to designate development limits in this particular instance.

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- 6.0.8 Llanddarog Road is conveniently situated approximately 5 miles from Carmarthen, with its wide range of facilities and services, and key transport hub status.
- 6.0.9 Llanddarog Road is also conveniently located in terms of the various services and facilities available in Llanddarog village and at Nantycaws. Direct access to the strategic highway network is also a key consideration.
- 6.0.10 The sustainable development credentials of this objection outlier site should therefore be given full recognition and consideration in the forthcoming 2nd Deposit LDP.
- 6.0.11 By way of summary, the designation of development limits for the objection site at Llanddarog Road is entirely appropriate for the following reasons:-

Compatibility with adjacent land uses

Development limits will provide certainty and thereby maintain compatibility with adjacent land uses.

Potential community benefits including affordable housing

An element of limited affordable housing will be a beneficial option in terms of providing much needed accommodation at a subsidised rent.

Site availability and deliverability during the Local Development Plan period

There are no constraints preventing minor appropriate development at this location.

Infrastructure capacity (water supply, foul and surface water capacity)

There is adequate infrastructure capacity within the cluster.

Accessibility to public transport

The objection site is located in close proximity to main public transport corridors.

Flood risk (Zones A, B, C1 & C2)

There are no flood risk issues.

Impact upon biodiversity, protected sites and species

No significant bio-diversity interest could be established.

Landscape impact

There will be no landscape impact from the objection site's designation.

Contaminated land

There are no known land contamination issues.

*Impact upon listed buildings, scheduled monuments, registered historic parks or
landscape parks*

There are no historic assets in the locality.

Impact upon conservation areas

There are no conservation areas within the locality.

Impact upon other environmental designations

The site does not form part of any other environmental designation.

6.3.12 By way of emphasis, the designation of development limits at Llanddarog Road will help sustain this small community by reinforcing the established settlement pattern.

7.0 CONCLUSION

- 7.0.1 This submission has been prepared in order to demonstrate that the designation of development limits at Llanddarog Road has the potential to contribute to the strategic aims and objectives of the replacement Carmarthenshire Local Development Plan (2018 – 2033).
- 7.0.2 The inclusion of the objection site within the development limits would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a limited, appropriate choice of housing type.
- 7.0.3 The designation of the objection site would be provide development certainty and would be in keeping and in character with the existing pattern of development. Incremental ribbon development along the highway would be controlled.
- 7.0.4 The designation of development limits at Llanddarog Road would:-
- be acceptable to both the form and character of the locality;
 - not be detrimental to the amenity of adjacent properties;
 - satisfy recognised housing and sustainability objectives;
 - not have a detrimental impact on the landscape or nature conservation interests.
- 7.0.5 For the reasons set out above, it is respectfully requested that favourable consideration be given to the inclusion of this objection outlier site within development limits in the forthcoming replacement Carmarthenshire LDP.