

Our Ref.: 1073a/RAB

Date: 13<sup>th</sup> 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. W. D. & Mrs G. I. Owens  
Land opposite Erw Non, off Heol-y-Plas, Llannon**

We are instructed by Mr. W. D. & Mrs G. I. Owens 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/100/007**, seeking inclusion of their land for future residential development within the defined settlement limits of Llannon within the Replacement Local Development Plan. The Candidate Site comprised of the road frontage portion of a modest, undulating field enclosure set off the eastern flank of Heol-y-Plas (A476 road).

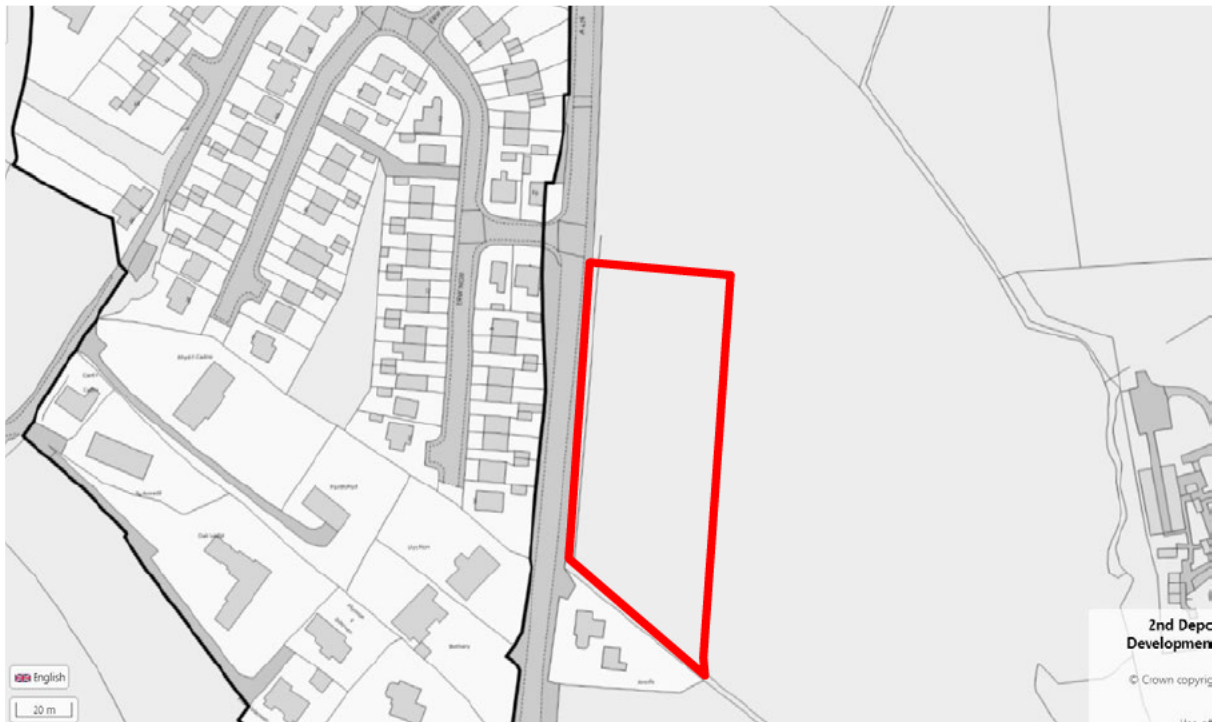
The Council have published a “Site Assessment Table” (January 2023) which provides details of the Council’s analysis of each received Candidate Site submission, and in the case of our clients’ submission, reasons why the site was not selected for inclusion within the draft settlement limits of Llannon, 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: *“Development of the site would result in a ribbon pattern of development contrary to general planning principles.”*

Our clients have considered this response and decided to **revise their proposals to seek inclusion of half the road frontage along Heol-y-Plas from that which was originally submitted as a Candidate Site back in 2018.**

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 Llannon, 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 Llannon, as reproduced below in Figure 1.**



**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 Deposit Draft Consultation stage:

- Completed Deposit LDP Representation Form
- Completed Sustainability Appraisal form
- Location plan and indicative site layout plan

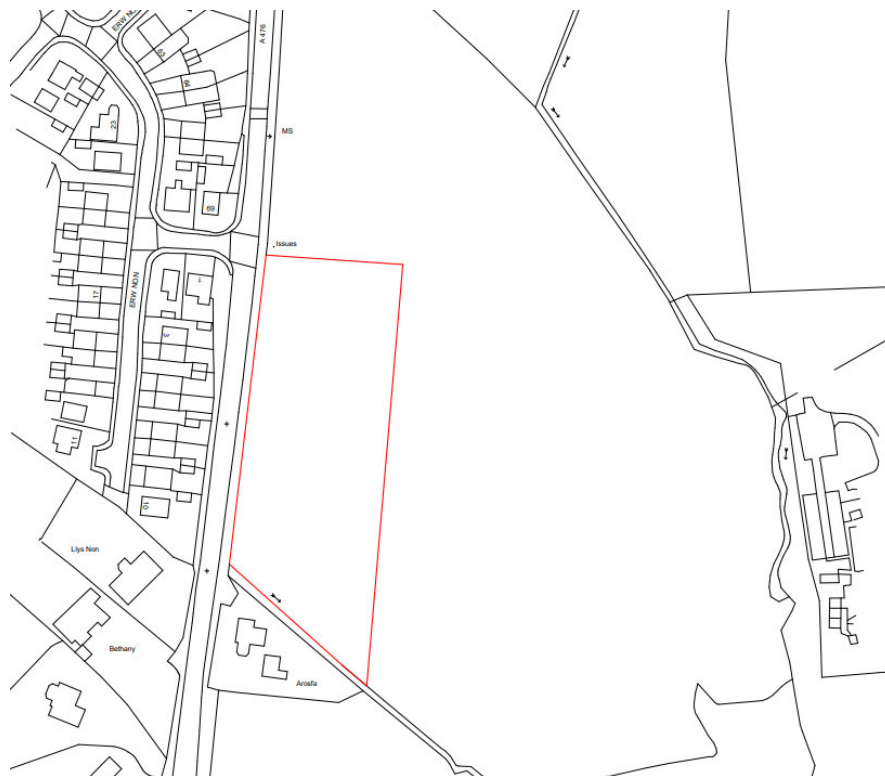
### **Response to Council’s Reasons for Non-Inclusion of Site within Settlement Limits**

#### **1.0 Perception of “Ribbon Pattern of Development”**

- 1.1 The Council consider that the inclusion of the site within defined settlement limits would represent a “*ribbon pattern of development, contrary to general planning principles.*” However, no detailed justification is made for that statement. In response, our clients would point to the form at which established development takes within Llannon. The **western flank of Heol-y-Plas (A476) consisting of a continuous frontage of residential properties** stretching for several hundred

metres in a south to north alignment. Motorists travelling along this highway have already entered a built-up locality, and encountered speed humps on this section of highway, providing an indication that the settlement is immediately upon them.

- 1.2 The field frontage in question lies alongside a residential property, known as “Arosfa”, which forms the southern boundary of the field enclosure. Erw Non lies directly opposite, being a residential estate of several dozen properties. The proposals under this Representation have been **revised from those submitted back in 2018**.
- 1.3 Only the southern half of this field frontage is now put forward as proposed residential development, being a roadside frontage of some 118 metres, and extending back to an equivalent depth as Arosfa, namely to a depth of 40 metres. Such a depth will allow for detached and semi-detached houses or bungalows to be formed fronting the main highway and set back to allow for adequate vehicle turning areas to be formed, allowing residents and visitors to turn within each developed plot and exit the plots in forward gear. Such a depth will also allow for traditional rear gardens of a minimum of 10 metres depth. **Only four detached dwellinghouses are proposed**.
- 1.4 The setting of roadside frontage properties along Heol-y-Plas is provided below as Figures 2 & 3, being an extract from Ordnance Survey Map and Google Earth respectively, and which graphically depict the setting of the revised Representation Site, directly opposite Erw Non.



**Figure 2 – OS Map of site edged in red**



**Figure 3 – Extract from Google Earth illustrating established road frontage development at Heol-y-Plas**

- 1.5 We therefore consider that the Council has adopted a rather inconsistent approach in the spatial pattern of allocating and subsequently granting planning permission of residential development within the settlement of Llannon. The allocated residential site in Llannon lies immediately north of Clos Rebecca, and it can be seen extending north, almost “ribboning” away from established properties, as shown in Figure 4.



**Figure 4 – illustration of Allocation at Clos Rebecca extending out into open countryside to the northern side of village**

- 1.6 We submit that our clients' land opposite Erw Non is no different in form from the allocated field north of Clos Rebecca. Our clients' field portion in question lies at a highly sustainable position along the A road, which would allow new residents to continue to access the excellent community facilities in the locality, such as the nearby Primary School and main bus route along Heol-y-Plas providing passengers non-car access between Cross Hands and Llanelli.
- 1.7 The Representation Site indicative site layout plan is reproduced below as Figure 5. It illustrates for only four detached dwellinghouses set fronting the eastern flank of Heol-y-Plas. The proposed site would be complementary in form to adjacent established forms of residential development along this highway, particularly at Erw Non as evidenced by the Proposal Map at Figure 1.



Figure 5 – Indicative site layout plan of proposed Representation Site

## 2.0 Overall Housing Supply at Llannon with Deposit Draft

2.1 The proposals under this Representation merely seek the addition of four residential units to the overall housing supply of Llannon. The village forms part of the Ammanford / Cross Hands Cluster (Cluster 3) as defined within the Second Draft LDP.

The Ammanford / Cross Hands Cluster aims to provide an additional 1267 residential units over the Plan period to 2033, and thus the addition of a site of 4 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 one allocation remains at Llannon as described above at land adjoining Clos Rebecca. Apart from that site, upon which development has commenced, there does **not appear to be any other opportunities in Llannon for a small residential opportunity. Research of the draft settlement limits reveals no “white land” readily apparent upon which a handful of residential plots could be formed.**

- 2.3 There is clear evidence in popular and “sought-after” villages such as Llannon, Foelgastell and Five Roads, which act as subordinate settlements to Llanelli and Cross Hands, that such minor sites are far more likely to be brought forward and developed in full by 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.
- 2.4 In the case of Llannon, there are little signs within the immediate locality of properties for second 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 Llannon. Consequently, it is a location where housing proposals are **deliverable, assisting to meet housing needs** in this part of Ammanford / Cross Hands Cluster.

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 revised their indicative proposals to just 4 dwellinghouses, situated directly opposite Erw Non, and which will not appear at odds to the prevailing spatial pattern of development in Llannon, 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 Llannon 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