

Our Ref.: 1079a

Date: 12th 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
Representation on Behalf of Mr. B. O. Beynon
Land part of Holloway Farm, Kidwelly

We are instructed by Mr B. O. Beynon to make a formal representation with regards to the above land and 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/074/011**, seeking the inclusion of their land within the development limits of Kidwelly as part of the Replacement Local Development Plan.

The Candidate Site comprises a potential second phase of Housing Allocation SeC3/h4 “Dinas Yard”, being a series of immediately adjoining grazing fields, which shares a common boundary with that future housing site, also located to the rear of Holloway Farm, and extends near the rear of established properties fronting Stockwell Lane. Its extents are illustrated by the site edged in red, being a site location plan, at Figure 1 below.

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 Kidwelly, as contained within the Second Deposit Draft.

We note that the submission successfully passed through all three 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). It however did not proceed further than 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: *“It is considered that there would be deliverability issues with this site, particularly with the permission on the adjacent site which would cater for the needs of the settlement in the long term.”*

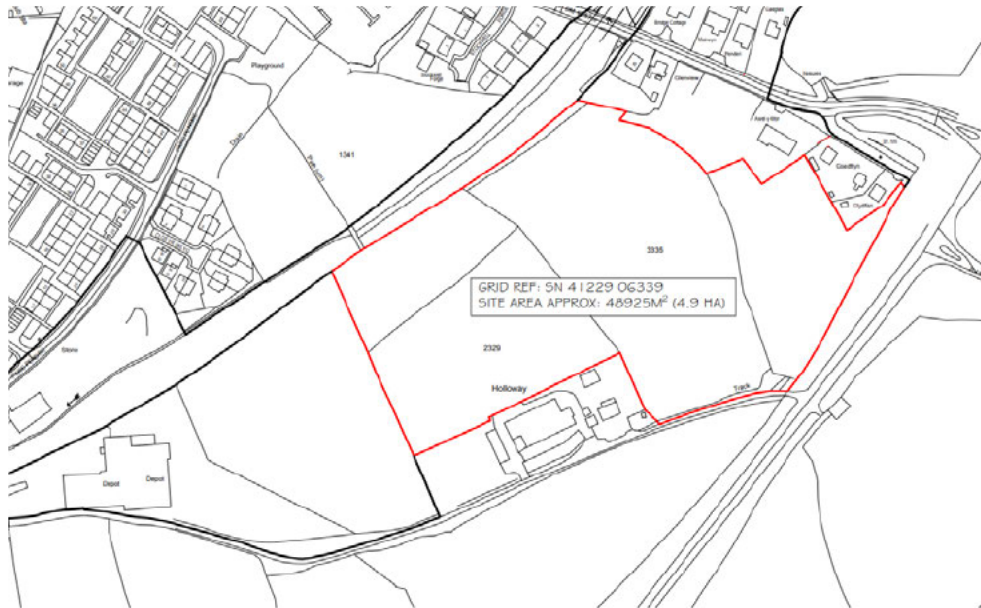


Figure 1 – Location plan of Candidate Site at Kidwelly

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 Kidwelly, 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 Kidwelly, as reproduced below in Figure 2. The land should be appropriately allocated for housing under Policy HOM1 “Housing Allocations.”**



Figure 4 – Extent of 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 plans

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

1.0 Overall Housing Supply at Kidwelly within Deposit Draft

- 1.1 The Council consider that there are **sufficient residential sites allocated elsewhere in the settlement**, and they believe there would be deliverability issues, with the first phase of the former Dinas Yard site being sufficient to cater for future housing growth at Kidwelly. The Candidate Site borders Site Allocation SeC3/h4 which has the benefit of Approval of Reserved Matters, granted in June 2022, for a total of 71 dwellinghouses. The Candidate Site is seen as a logical second phase of that allocated site, with the proposed access estate road extending east from that development, which initially junctions off Pembrey Road.
- 1.2 The Council's Assessment conclusions, suggest that they accept that the form of the Candidate Site set between the Kidwelly By-Pass and former railway line to Stockwell Lane is in accord with the spatial form and character of the settlement.
- 1.3 The proposals under this Representation seek the addition of circa 80 residential units to the overall housing supply of Kidwelly, which forms a Tier 2 Service Centre, being part of the Llanelli Cluster as defined within the draft LDP. Figure 3 below provides an extract of the indicative site layout plan for this Representation site.



Figure 3 – Indicative Site Layout plan of Representation Site

- 1.4 The Llanelli Cluster (Cluster 2) aims to provide an additional **3039** residential units over the Plan period to 2033, with Kidwelly (Settlement SeC3) providing three allocated sites at expected to provide a combined total of 115 units to that overall Cluster total (reproduced at Figure 4 below). We would submit in the first instance that the addition of an additional allocated site of 80 units will not lead to an over-supply of dwellinghouses within the wider Llanelli Cluster settlement supply.

Kidwelly				
SeC3/h2	Land off Priory Street	20	2.4	Year 11 - 15
SeC3/h3	Llys Felin	24	1.5 + Commuted Sum Contribution	Year 1 -5 Year 6 - 10
SeC3/h4	Land at Former Dinas Yard	71	5	Year 6 - 10

Figure 4 – Extract from Policy HOM1 for Kidwelly

- 1.5 We have examined and researched sites which have been brought forward as Residential Allocations with the Deposit Draft. In Kidwelly, we consider reference should be made to the current adopted (2014) Local Development Plan to enable a comparison to be made as to the Council's aspirations for the future growth of housing in that settlement. Within the Draft Plan, we note the continued allocation of

Dinas Yard and land part of Holloway Farm, which was allocated from the 2008-21 Local Development Plan. The above table indicates that the Council expect that site to be delivered to the market between LDP Years 6-10, being 2024 to 2028. Indeed, construction works **will be commencing in Summer 2023** following the granting of Approval of Reserved Matters for 71 dwellings.

- 1.6 However, we note that in the case of the other proposed allocation at “*Llys Felin*,” work is complete upon a first phase of 9 bungalows, with a further 15 units currently subject of a planning application. Site Allocation SeC3/h2 at “*Land off Priory Street*” is a new allocation for 20 units, having appeared as outside settlement limits in the 2014-adopted LDP, as reproduced at Figure 5 below.

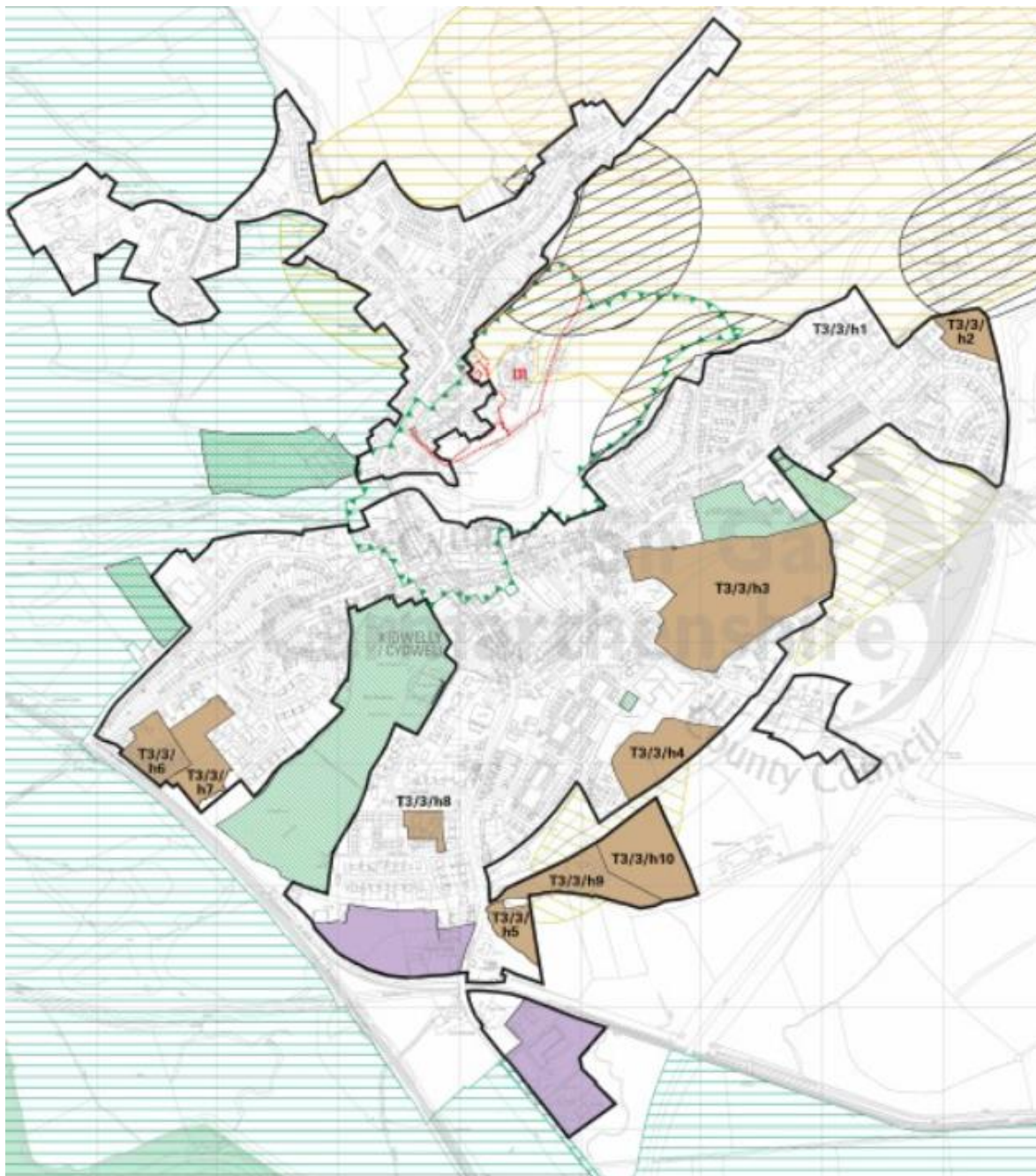


Figure 5 - Extract of 2014-adopted LDP Proposal Map for Kidwelly

- 1.7 The current Development Plan Map for Kidwelly reveals the success of residential allocations in the town. Sites T3/3/h2, h6, h7 and h8 have all been completed or nearing completion, and site T3/3/h9 and h10 has Approval of Reserved Matters with a commencement imminent. Sites T3/3/h3, h4 and h5 do not have the benefit of planning permission, and it is noted **have been omitted from the new Second Deposit Draft accordingly.**

2.0 Llanelli, Burry Port, Hendy and remainder of Cluster 2

- 2.1 We have examined and researched sites which have been brought forward as Residential Allocations with the Deposit Draft. Kidwelly falls under the Llanelli Cluster which extends along the Burry Estuary coast from Kidwelly in the west to Bynea in the east, and north to Llangennech and Hendy about the M4 corridor.

Great emphasis within the Draft Plan has been placed upon the continued allocation of proposed housing sites still left allocated from the 2014-21 Local Development Plan. Figure 6 below provides an extract of such sites.

PrC2/h1	Beech Grove, Pwll	10
PrC2/h3	Parc y Strade	?
PrC2/h4	North Dock	210
PrC2/h22	Cwm y Nant, Dafen	202
PrC2/h23	Dafen East Gateway	150
PrC2/h24	Clos Ffordd Fach	13
SeC4/h2	Burry Port Harbourside	364
SeC6/h2	Land between Clayton Road and Bronallt Road, Hendy	20
SeC7/h1	Box Farm	7
SeC7/h3	Golwg Yr Afon, Llangennech	50
SeC8/h1	Ffos Las (numbers)	45
SeC8/h3	Golwg Gwendraeth	141
SuV22/h2	Land adj. to Ty Newydd, meinciau Rd, Mynyddygarreg	8
SuV23/h2	Adjacent Little Croft, Five Roads	25

Figure 6 – Selection of Deposit Draft Housing Schedule in Llanelli Cluster

- 2.2 We note that within the Proposals Map for Burry Port, it included for three sites, **two of which have been completed** at Goodig and Glanmor Terrace leaving just one proposed site, which being the Harbourside site for 364 dwellings. The site has been marketed by the County Council for many years, and despite its coastal position, has failed to receive firm interest and any form of detailed planning application. Ground conditions require extensive remediation of former historic uses.
- 2.3 The Llanelli suburbs of Llwynhendy / Cefncaeau and Dafen, where four of the above allocations are identified, has not altered since the 2014 adopted LDP and remain undeveloped but re-allocated in the Deposit Draft. **Cwm-y-Nant** (PrC2/h22) and **Dafen East Gateway** (h/23) were both sites allocated within the Carmarthenshire Unitary Development Plan (2006) and as mentioned

above, within the Local Development Plan (2014) as sites GA2/h27 and h/30 & h/31. They have a combined total of **352 dwellings**, although neither site has been the subject of any detailed planning application, let alone market interest.

The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across all Dafen sites. Any residential development upon either site will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites.

- 2.4 **Beech Grove at Pwll** (PrC2/h1) has remained allocated for 10 units for the last 10 years in Development Plans. No application for planning permission has even been lodged at the site.
- 2.5 **Cae Linda** in Trimsaran (SeC8/h2) for 45 units has been in Development Plans stretching back to the Llanelli Borough Local Plan in 1995. It has only been developed with 5 houses, and thus its continued allocation for forty more units in the draft LDP must surely come under question?
- 2.6 Consequently, at least twenty years of Development Plan allocations have elapsed without any signs of wholesale delivery of these sites. There is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use.

We submit that the above draft allocations be omitted from the Plan, and that housing allocation be redistributed to Alternative Sites, of circa 80 units such as that proposed at Holloway Farm in Kidwelly. There is clear evidence that such moderately sized sites are far more likely to be brought forward and developed in full by regional and local 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.

3.0 CONCLUSION

- 3.1 In conclusion, this Representation to the Second Deposit Draft of the Revised LDP has sought to examine the Council's reasons for non-inclusion of a Candidate Site. Our clients have illustrated that their indicative proposals to construct circa 80 dwellinghouses will not appear at odds to the prevailing spatial pattern of development in Kidwelly. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, which in turn, advocates that the form of development proposed at Holloway Farm is no different, resulting in it being respectful to the character and setting of the locality.
- 3.2 The Council must acknowledge that the costs in preparing, submitting and negotiating through to a positive decision for Approval Of Reserved Matters

demonstrates our client's commitment to deliver housing allocations. The site will shortly be under construction with a regional housebuilder with a view to completion within two years, and thus the proposed Phase 2 will enable house building to continue into the latter years of the Replacement LDP Plan Period.

We respectfully request that this Representation be given careful examination, and consequently the defined settlement limits of this part of Kidwelly realigned to include the Representation Site, as a Residential 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 clients