

*Paul Davies*

*42 Byrd Crescent  
Penarth  
Vale of Glamorgan  
CF64 3QW*

*Tel* [REDACTED]

*Email :* [REDACTED]

6<sup>th</sup> April 2023

Dear Sir/Madam,

**Carmarthenshire Revised Local Development Plan 2018-2033**

I refer to the above matter and I enclose a completed Representation Form together with attachments, comprising 3 pages of supporting text and a Land Registry plan.

I would be grateful if you would forward my representation to the Inspector for his consideration in due course.

If in the meantime you have any queries I shall be pleased to hear from you.

Yours faithfully,

[REDACTED]

The Forward Planning Manager, Place and Sustainability,  
Department of Sustainability and Infrastructure  
3 Spilman Street  
Carmarthen SA31 1LE

**RHAN A: Manylion cysylltu****PART A: Contact details****Eich manylion/manylion eich cleient**  
**Your details / your client's details****Manylion yr asiant**  
*(os ydynt yn berthnasol)*  
**Agent's details (if relevant)****Enw**  
**Name**

Paul Davies

None

**Teitl swydd (lle y bo'n berthnasol)**  
**Job title (where relevant)**

Retired

**Sefydliad (lle y bo'n berthnasol)**  
**Organisation (where relevant)**

None

**Cyfeiriad**  
**Address**42 Byrd Crescent Penarth  
Vale of Glamorgan  
CF64 3QW**Rhif ffôn**  
**Telephone no**

[REDACTED]

**E-bost**  
**Email address**

[REDACTED]

**Llofnodwyd**  
**Signed**

[REDACTED]

**Dyddiad**  
**Date**6<sup>th</sup> April 2023.**RHAN B: Eich sylw****PART B: Your representation****Eich enw / sefydliad**  
**Your name / organisation**Paul Davies  
—**1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?****1. Which part(s) of the Plan (or supporting documents) are you commenting on?**

<p><i>Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle</i> LDP policy or site allocation number(s)</p>	<p>The LDP land previously identified as PrC2/h19 and shown coloured blue on the attached Land Registry plan</p>
<p><i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i> LDP paragraph or section number(s)</p>	<p>N/A</p>
<p><i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i> LDP Proposals Map reference(s)</p>	<p>The land is situated to the west of Pendderi Road, Bynea, Llanelli</p>
<p><i>Os yw eich sylw yn perthyn i ddogfen ategol (e. e. y Gwerthusiad o Gynaliadwyedd), rhowch yr enw(au) a'r cyfeiriad(au) i mewn yma.</i> If your representation relates to a supporting document' including the: Sustainability Appraisal), and/or Habitat Regulations Assessment insert the name of the document and section reference(s) and/or paragraph number here.</p>	<p>N/A</p>
<p><b>2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol.</b> <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> <b>2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.</b> <i>For more information on soundness and procedural requirements, see the guidance notes.</i></p>	
<p><i>Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.</i> I think the LDP is sound and meets procedural requirements.</p>	<p>No. Not in respect of the removal of the Pendderi Rd land.</p>
<p><i>Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.</i> I think the LDP is unsound and should be changed.</p>	<p>Yes</p>

<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i> I think that the procedural requirements have not been met.</p>		Yes
<p><b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b> <i>Ticiwch <u>bob un</u> sy'n berthnasol.</i></p> <p><b>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</b> Tick <u>all</u> that apply.</p>		
<p><i>Dyraniad safle newydd</i> New site allocation</p>		Yes
<p><i>Polisi newydd</i> New policy</p>		N/A
<p><i>Paragraff neu destun ategol newydd</i> New paragraph or supporting text</p>		Yes
<p><b>4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel safle cais? Os felly, a fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).</b> <b>4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).</b></p>		
<p><i>Enw'r safle</i> Site name</p>	<p>Land to the west of Pendderi Road, as shown on the attached Land Registry plan.</p>	
<p><i>Cyfeiriad y cais</i> Site reference</p>	<p>Previously included in the county's LDP as land allocated for residential development and numbered PrC2/h19</p>	
<p><i>Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.</i></p> <p>If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a</p>		

development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

### **5. Rhestrwch eich sylwadau isod.**

*Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/proffion cademid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.*

### **5. Please set out your comments below.**

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

I should be grateful if the Inspector would consider reinstating the Pendderi Road land, shown coloured blue on the attached plan, into the County's Revised Development Plan 2018-2033. My request is based on the fact that a number of opportunities to dispose of this land to developers for residential development have failed for reasons entirely beyond our control. I attach three pages (Document 1) which provide an explanation of what has happened in each case. We are currently in contact with two developers who have expressed interest and it is felt that reinstatement of our land into the LDP will provide assurance ~~may~~ help progress matters with these developers. *Land*

*Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.*

Tick here if you are submitting additional material to support your representation.



**6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?**

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer hefyd y bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol ar gyfer darparu ar gyfer y rhain sydd eisiau rhoi tystiolaeth lafar.

**6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?**

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

*Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.*

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.



*Rwyf am siarad mewn sesiwn gwrandawriad.*

I want to speak at a public hearing.

No.

*Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').*

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

N/A

**7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.**

**7. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.**

*Rwy'n dymuno cael fy nghlywed yn Gymraeg.*

I wish to be heard in Welsh.

N/A

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

N/A

There have been 3 approaches from house builders, Redrow, Barratt and Jehu Construction Plc, all of which failed for reasons beyond our control.

One company, Persimmon has provided an offer that is considered far too low.

At present, there are two companies Willis Construction Limited and Castell Group Limited with whom we are in contact and who, at this stage, appear to offer a realistic opportunity for progress.

The details of our interaction with these companies are as follows :

**2005** – Soon after the inclusion of the Pendderi Road field in Carmarthenshire County Council's (CCC) Local Development Plan (LDP) we received several expressions of interest. The national house builder **Redrow** emerged as the preferred developer. Their purchase offer was accepted and a sale agreement signed. Sale of our land was dependent simply upon Redrow obtaining outline planning permission from CCC.

However, before Redrow were able to obtain this permission, CCC placed an embargo upon new housing developments in this part of the county as it had become apparent that Welsh Water (WW) did not have sufficient capacity to process additional domestic waste water. WW began work to increase the processing capacity at their local coastal processing plants and this work was expected to take 18 months.

We entered into a supplemental agreement with Redrow, extending their time for obtaining outline permission, but WW's work continued beyond the 18 months. Consequently, the supplemental agreement expired.

Although Redrow would not offer to further extend the agreement, we were prepared to return to them once WW's work was eventually completed. However, the financial crash intervened. In 2007 Redrow would then only offer us a 5 year Option Agreement on the land. This specified a considerably reduced purchase price and various new terms which were unacceptable to us. But most importantly, as an option agreement, it contained no firm commitment to purchase. We declined the offer of the Option Agreement and in either Dec 2007 or Jan 2008 Redrow formally withdrew their interest in our land.

**2012/2013** - The house builder **Barratt** expressed an interest. They had recently completed a housing development nearby (Heol y Mynydd) and at that time all the adjacent Genwen fields were available for purchase. However, negotiations with them did not progress. Local residents who opposed the scheme citing creeping urbanisation, flooding risks and potential detrimental effect on the Welsh language locally, enlisted the support of the local MP, Dame Nia Griffith, and began pressurising the Welsh Assembly to 'call-in' the scheme. Barratt, mindful that they had already satisfied CCC's requirements, feared that they might well have to repeat that work for the Assembly's benefit. In view of the additional time and admin costs that would involve, and with no absolute guarantee of success at the end of the process, Barratt decided to withdraw their interest and concentrate instead on other, less troublesome projects. It seemed to us unfair that the protesters, who had failed to have their objections upheld at a public inquiry, had opted to step outside the statutory procedures and discourage a developer from proceeding with a legitimate project.

**2015** - An approach from **Persimmon**. Protracted communications have only resulted in a very low offer. Their offer remains on the table but the majority of the joint owners have no enthusiasm for its acceptance.

**2021** - An approach from **Castell Group Limited**. We were unimpressed by the fact that their written communications repeatedly failed to include their full limited company name, company number and registered office address. As this was a failure to comply with Companies Act requirements I felt I could not recommend their approach to the other joint owners and it was agreed that we should not engage with them.

**2021**– We received an approach from a Bridgend based developer **Jehu Group Plc**. During 2021/22 discussions with them progressed and they submitted a gross conditional offer which we considered attractive. Discussions continued with a view to reaching a net figure, but toward the end of 2022 matters abruptly ground to a halt when it was announced that Jehu had ceased trading due to severe financial difficulties.

**2023** - In February 2023 I contacted a Cardiff based company, **Willis**



**Construction Limited**, to ascertain whether they might be interested in acquiring our Pendderi Road land for development. This company had come to my attention when I noted that they had taken over a halted Jehu development site at Llandough in the Vale of Glamorgan. Willis's managing director has expressed interest in our land. They are currently making some enquiries and I believe, consulting with a housing association. I await hearing from them further.

**2023** - I received an expression of interest from **Castell Group Limited**, the company that had contacted us previously, in 2021. Their correspondence now showed that they were fully complying with the legislation in terms of displaying registered name and number and registered office address. Matters are at an early stage and initially their Land Manager is to write to all joint owners individually for confirmation that they agree to engage with the company.



6/4/2023 .

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