



REPRESENTATION STATEMENT
TO
REPLACEMENT CARMARTHENSHIRE LOCAL
DEVELOPMENT PLAN 2018-2033

FORMAL OBJECTION TO POLICY HOM1
SITE PrC1/MU2 - PIBWRLWYD

Our Ref: LDP-HOM1-PrC1/MU2

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1.0 INTRODUCTION

- 1.1 Evans Banks Planning Limited act for a number of landowners and have made formal representations in respect of those clients' land interests in relation to the Carmarthenshire Replacement Local Development Plan (2018-21): Second Deposit Draft. Within those Representations, we have referred to previous Candidate Site submissions made in August 2018. The Council in response to those Candidate Site submissions have published a Site Assessment Table (January 2023). We have noted in rejecting Candidate Sites, the Council has on multiple occasions concluded that a Candidate Site should not progress and be allocated as *"there is sufficient land allocated for housing growth elsewhere in the Plan."*
- 1.2 Policy HOM1 "Residential Allocations" refers to the schedule of sites put forward as draft residential allocations to meet housing growth over the Plan Period.
- 1.3 This Statement will focus upon a significant allocated site with the Carmarthen Cluster (Cluster 1) that being Site PrC1/MU2 at Pibwrlwyd. The Schedule of Residential Allocations at Policy HOM1 indicates that 247 residential units are proposed and anticipated to be brought forward over only one "Delivery Timescales", namely over **Years 11-15 (2029-33), therefore being very late in the Plan Period.**
- 1.4 On behalf of our clients, we herewith lodge a formal representation in objection of the Mixed-Use Allocation. We submit that the Council's expectations for the delivery of this site are unachievable based upon its lack of progress since allocation within the adopted Carmarthenshire Unitary Development Plan 2001-16, and Carmarthenshire Local Development Plan 2008-21. This Statement will focus upon the slow progress of the site evidenced by not only lack of applications for full planning permission, but also the **"sea-change" in local planning policy** from adopted Supplementary Planning Guidance dated 2014. In that SPG, the Council expressly stated that any form of residential development upon the site would be resisted.
- A noticeable lack of active site marketing further compounds the argument that the level of mixed-use allocation is unrealistic.

2.0 SITE CONTEXT IN SECOND DEPOSIT DRAFT

- 2.1 The Pibwrlwyd Strategic Residential Site (PrC1/MU2) is part of a Mixed-Use Allocation, made under the provisions of Policy SG1 “*Regeneration and Mixed-Use Sites*” which in the case of Pibwrlwyd states that the site is provided for “*Includes a mix of uses reflecting its strategic location and contribution to Carmarthen. Uses include employment, commercial leisure, education associated with Coleg Sir Gâr and residential (an allowance is made for 247 new homes)*”.
- 2.2 The site extends over several hectares of open, undulated, former pasture, set off the eastern flank of the A484 Carmarthen to Kidwelly Road, extending east by several hundred metres to the eastern boundary with the A48 trunk road. Coleg Sir Gar is to be found in the southern extremity of the allocation, and Parc Pensarn Retail and Employment Park in the northern portion.

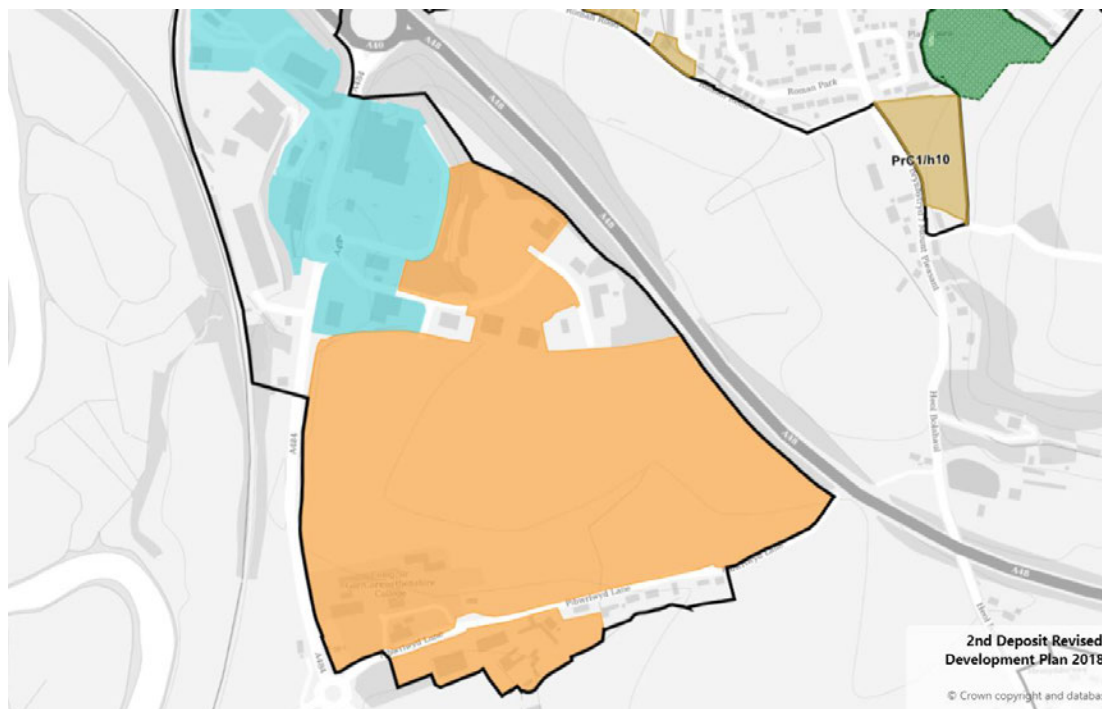


Figure 1 – Extract from Proposals Map showing extent of Site PrC1/MU2

- 2.3 The southern extent of the allocation shows it also includes educational uses off the southern flank of Pibwrlwyd Lane, which lies off the roundabout interchange with the

A484, and where a handful of established houses are to be found extending eastwards to where that minor road terminates near the A48 embankment.

- 2.4 Figure 2 below provides a Google Earth image of the retail, employment and educational uses as of April 2021, whilst Figure 3 shows the state of development progress back in **June 2018, which coincides with the start of the Replacement LDP Plan Period.**



Figure 2 – Google Earth – April 2021 – illustrating extent of development about Pibwrlwyd at that time



Figure 3 – Google Earth – June 2018 – illustrating extent development about the start of Replacement LDP Period

- 2.4 The above Google Earth images reveal that extent of new commercial office units constructed at Cabna Court off Heol Glyndwr that has taken place since June 2018. It is notable that the wide, open expanses of undulating fields stretching south for a distance of some 360 metres **have remained in their agricultural state for generations, with no signs of any form of built development.** It is also notable in that time, that the extent of educational buildings at the Pibwrlwyd Campus have remained unchanged, with little progress in terms of expansion and / or redevelopment. **In other words, the majority of the Strategic Site has lain dormant for many years.**

3.0 Progress since Adoption of Local Development Plan in 2014

3.1 The Carmarthenshire Local Development Plan was adopted in December 2014. The Plan is scheduled to run over a Plan Period from 2008 to end of 2021. The Site at Pibwrlwyd was allocated for Mixed Use in that Plan and referenced GA1/MU2. Figure 4 below illustrates the extent of the allocation for the current adopted Plan.

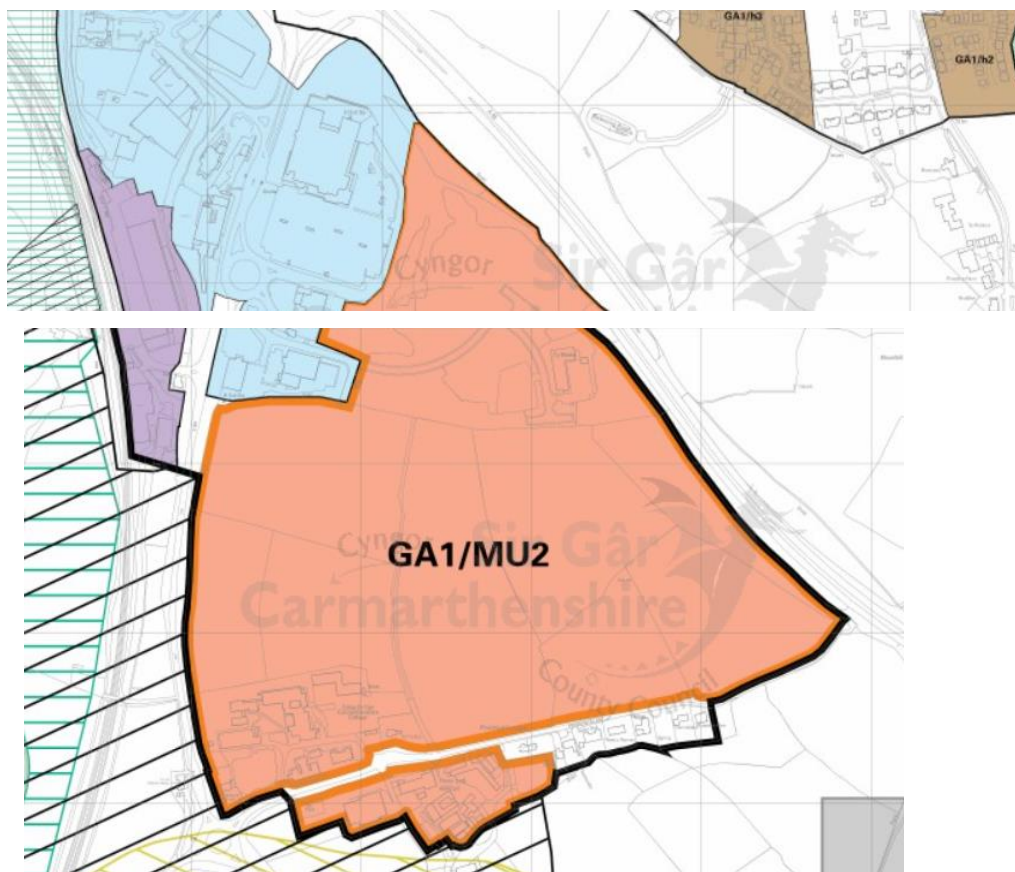


Figure 4 – 2014-adopted Local Development Plan for Allocation GA1/MU2

3.3 Since adoption of the 2014 LDP, applications for full planning permission have been granted for a “swim centre”, dental surgery and two office suite units in the northern part of the allocation at Cabna Court. Whilst off the Pibwrlwyd Lane part, a single-storey animals testing unit has been formed. All those developments have been completed and implemented. A planning application for a manufacturing unit with warehouse was granted off Heol Glasdwr, adjoining Cabna Court in September 2021, but has yet to commence any on-site works.

3.4 PIBWRLWYD SUPPLEMENTARY PLANNING GUIDANCE

3.4.1 The Pibwrlwyd Supplementary Planning Guidance was adopted alongside the LDP in December 2014. It describes the vision and policy provision for Pibwrlwyd to include for “*The proposed use for the site is for a business park centred around employment uses (Use Classes B1, B2 and B8), with uses associated with, and ancillary to the existing Coleg Sir Gâr. A development brief in the form of SPG has been prepared and adopted. This in setting out appropriate uses under Use Classes B1, B2 and B8 for the employment element of the site also explores other compatible uses. **Residential use on this site is not considered appropriate**”.*

3.4.2 The SPG outlines proposed uses for the site, as follows:

“Due to the strategic location and the prominence of the site, any development on the site must be of high quality. Acceptable uses on the site include:

B1 Business: Offices not within A2.

Research and Development, studios, laboratories, high tech, light industry.

B2 General Industrial: Appropriate uses that don't have an adverse impact on neighbouring uses.

B8 Storage or Distribution: Wholesale warehouse, distribution centres, repositories.

D1 Non-residential Institutions: non-residential education and training centres – relating to the extension of the Coleg Sir Gâr campus.

Other suitable uses may include, subject to amenity considerations:

- *Car showrooms and sales (sui generis);*
- *Hotel (C1);*

Use Classes B1, B2 and B8 will be restricted to 15.5ha of the overall site.”

3.4.3 It is therefore abundantly clear that the focus throughout the entire SPG is to encourage B1, B2 & B8 uses from Parc Pensarn to the north, and Educational uses from the Coleg Sir Campus from the south. Due to the obvious potential for environmental conflicts with those industrial and commercial uses, any form of residential development was **strongly resisted**.

4.0 CARMARTHENSHIRE UNITARY DEVELOPMENT PLAN 2001-16

4.1 The Carmarthenshire Unitary Development Plan was adopted in June 2006. The land at Pibwrlwyd was allocated as a Strategic Site under Policy E15, referenced as Site PDB19. Figure 5 below provides an illustration of the Proposals Map from the UDP.

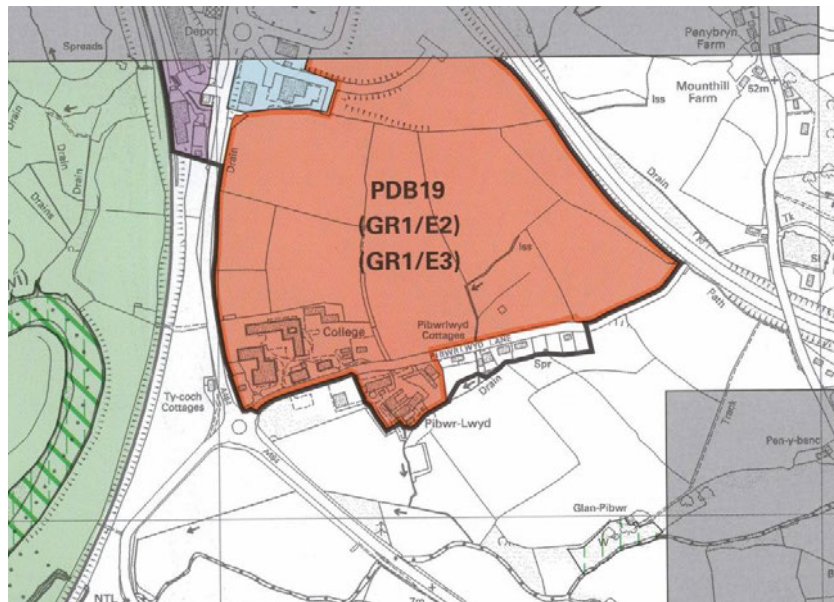


Figure 5 – Unitary Development Plan Extract of Pibwrlwyd

4.2 The site was also allocated in the Carmarthenshire Unitary Development Plan as a Planning and Development Brief Site, which sets out the vision of the site “as a *Business Park centred on B1, B2 and B8 uses and will allow for the consolidation and redevelopment of the existing Carmarthen elements of Coleg Sir Gâr within the site. The Brief will evaluate the feasibility of other compatible uses, including car showrooms and some limited retail use...Residential uses are not considered appropriate for this site”.*

5.0 OBJECTION TO RESIDENTIAL ALLOCATION IN SECOND DEPOSIT DRAFT LOCAL DEVELOPMENT PLAN

- 5.1 The Replacement LDP seeks to delivery “an allowance of 247 units” over a Plan Period from 2018 to 2033 at Pibwrlwyd, **in complete disregard for the 2014 Supplementary Planning Guidance.**
- 5.2 The bulk of the land at Pibwrlwyd lies under the freehold ownership of Coleg Sir Gar. The College have owned the site throughout the above UDP and LDP Plan Periods. During that Period, they not undertaken any marketing of the site to seek out commercial, leisure or industrial uses in line with the Local Planning Policy framework, particularly the Supplementary Planning Guidance. In contrast, the owners of Cabna Court to the north, namely Welsh Government, have embarked upon a marketing campaign (principally through appointed Land Agents Cushman & Wakefield) and successfully attracted several office and commercial interests to the commercial estate off Heol Glasdwr.
- 5.3 The Council have indicated that they expect the delivery of the Pibwrlwyd site to taken place in LDP Years 11-15, that being 2029-2033, and thus remains a further 5-10 years before the development potential is realised. That timescale equates **to a period of over 25 years of allocations** in the UDP and two LDPs without any prospect of even part of the allocation being fulfilled, and not even the subject of a planning application.
- 5.4 **National Planning Policy** in terms of the allocation of residential land in Local Development Plans is to be found in Planning Policy Wales (Edition 11) (February 2022). PPW has a long-standing policy provision that industrial and residential development **should be segregated** in order to avoid any potential for future conflicts between the ability of those existing businesses to properly function and trade, versus the rights and needs of occupiers of residential properties to be afforded a reasonable level of amenity. By siting new residential development near to commercial development, difficulties can arise in terms of complaints of excessive, vibration, dust and disturbance from the use of loud and heavy machinery and the movement of

heavy goods vehicles. Hours of operation of those commercial operations can be questioned, particularly of between the hours of 19:00 to 07:00 hours on week nights and at weekends when adjoining occupiers of residential properties tend to be more home based. Many modern businesses now require operating over longer shift patterns and accordingly the traditional hours of working strictly during the weekday have long been cast aside. HGV deliveries, for example, may be necessary during early morning and / or evening hours. Siting new residential development in close proximity to existing and proposed industrial development will undoubtedly create potential for conflict and disturbance to those new Pibwrlwyd residents upon the Pibwrlwyd Strategic Site.

- 5.5 We have noted at Pibwrlwyd that Heol Glasdwr has two access spurs leading off its west-east axis. The eastern-most access leads onto Cabna Court as shown at Photo 1 below, taken in March 2023. The extent of new build offices at Cabna Court is shown off both flanks of the estate road which terminates at the Coleg Sir Gar land.



Photo 1 – Cabna Court north of Pibwrlwyd

- 5.6 Photo 2 illustrates the other access spur off the western side of Heol Glasdwr, where industrial units are positioned off that carriageway. It graphically illustrates how new residents would have to negotiate past commercial vehicles to access their new homes and give rise to potential conflicts.



Photo 2 – access off Heol Glasdwr amongst commercial units

5.7 We note that the open fields at Pibwrlwyd comprise some 22 hectares below / south of the Cabna Court and Heol Glasdwr commercial uses. Assuming the LDP capacity expectation of 35 units per hectare is achievable, a total “allowance of 247 units” would require 7 hectares of land take, and thus equating to one-third of the site.

5.8 Given that no firm proposals have yet to materialise on this majority part of the Strategic Site, and also over the last 20 years, and yet it remains allocated in the Second Draft. It is likely that any residential development would appear “stand-alone” and remote from any integrated mixed-use development at Pibwrlwyd. The obvious and longstanding uncertainty and lack of progress in bringing this part of the allocated site to fruition will undoubtedly also reflect upon a residential element within that scheme. By the Council’s own admission, it only likely to come forward in the latter years of the new LDP, and thus such a prediction is hardly an endorsement of its potential creditability and deliverability.

5.9 Locational Remoteness

5.9.1 The site is completely and physically divorced from established housing at Pensarn and Llangunor. It is physically separated by foot from local schools, community facilities and play facilities by the A40 / A48 trunk road network, with only a **dark and insecure** pedestrian underpass linking it to the Pensarn Commercial Area. Parents and their children would have to walk some two kilometres and up Rhiw Babell hill to access the nearest Primary School at Llangunor. This is unlikely to occur and

instead, parents will resort to travelling to school by private car, which defeats sustainability principles and objectives inherent in development plan policy making.

New housing at this location would accordingly be quite alien in form to the long-established business and education uses at Pibwrlwyd. Figure 6 below illustrates the distances to the nearest local primary school and green space in the locality.

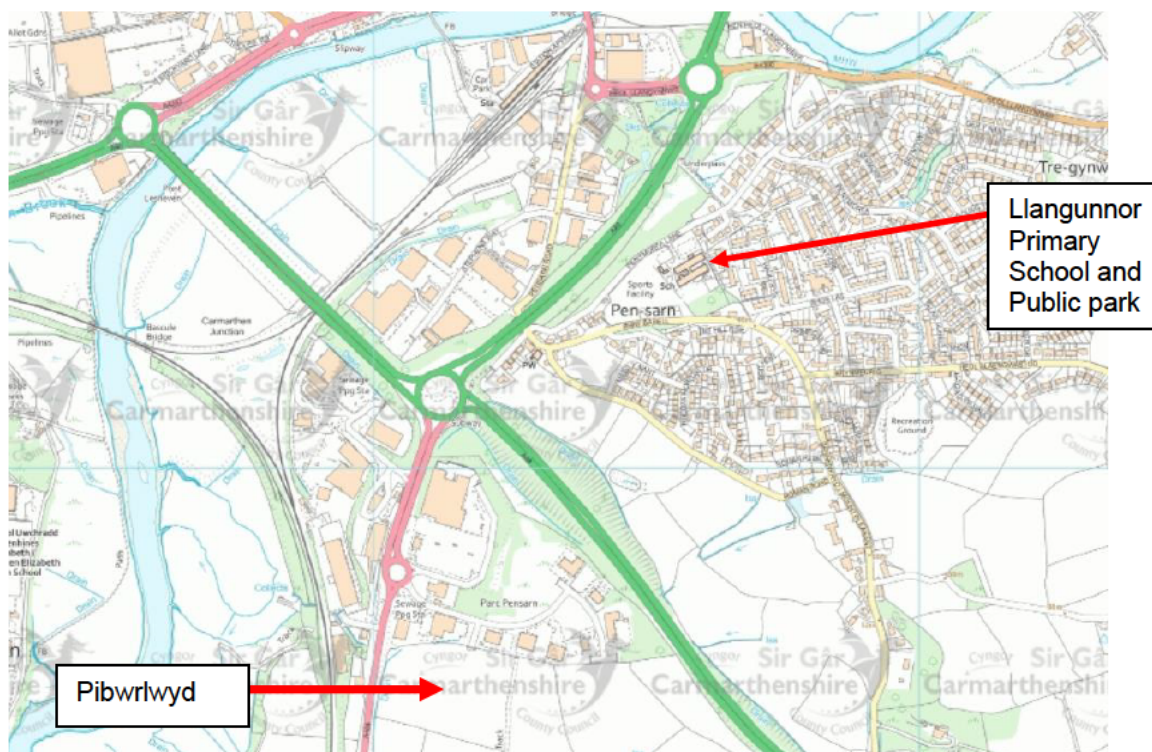


Figure 6 – Remote distance of Pibwrlwyd Site from nearest Primary School

6.0 CONCLUSION

- 6.1 The Allocated Site at Pibwrlwyd is substantial in overall size. The Carmarthen Cluster is expected to deliver 1690 units over the Plan Period, and thus the residential element of the Mixed-Use site (247 units) contributes **14.6%** towards that overall total. That equates to **one new house in every seven** in the Carmarthen Cluster is being promoted at an “out-of-town” location, divorced from community facilities.
- 6.2 After over 20 years of UDP and LDP Plan Periods, only Welsh Government have enacted upon the Mixed-Use allocation, as evidenced at Cabna Court. Coleg Sir Gar in contrast over this time have not even undertaken any known marketing campaign to realise the asset bestowed upon by the above two Development Plans.
- 6.3 **We submit that the Allocated Site be dramatically reduced in scale to only include the area about Cabna Court and Heol Glasdwr for employment purposes (B1, B2 & B8). The area about Coleg Sir Gar at Pibwrlwyd Lane could benefit from perhaps one sole modest field enclosure to allow for educational expansion. The remaining field enclosures, being the bulk of central 20 hectares, should be omitted from the allocation.** The proposed housing allowance should be re-allocated elsewhere in Carmarthen to more sustainable Candidate Sites.
- 6.4 Clearly, there is no historic demand for a Mixed-Use site of this scale in this part of Carmarthen. New commercial development is attracted to Cross Hands East and Parc Dafen in Llanelli, being located further east along the A48 / M4 corridor, and thus locationally superior. The Cillefwr Industrial Estate and area about the Carmarthen Livestock Mart are able to satisfy future employment growth for the town of Carmarthen.
- 6.5 The overwhelming majority of the allocation has underdelivered. We would refer and advocate to the Inspector to heed Welsh Government’s Guidance provided in Development Plans Manual (Edition 3) (March 2020). Page 120 states: **“Rolling forward allocations** - *Allocations rolled forward from a previous plan will require*

careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered. The sites should be subject to the same candidate site process requirements as new sites i.e., they must be demonstrated to be sustainable and deliverable. If an LPA wishes to retain such sites but cannot evidence, they will be delivered, i.e., for aspirational or regeneration purposes, they can still be allocated in the plan but not relied upon as contributing to the provision. It will not be appropriate to include such sites in the windfall allowance. They should be treated as 'bonus sites'."