

Our Ref.: 1613a/RAB

Date: 13<sup>th</sup> April 2023

Forward Planning Manager  
Place & Sustainability  
Department of Sustainability & Infrastructure  
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. Lawrence  
Land part of Llwyn yr Aderyn, Brechfa**

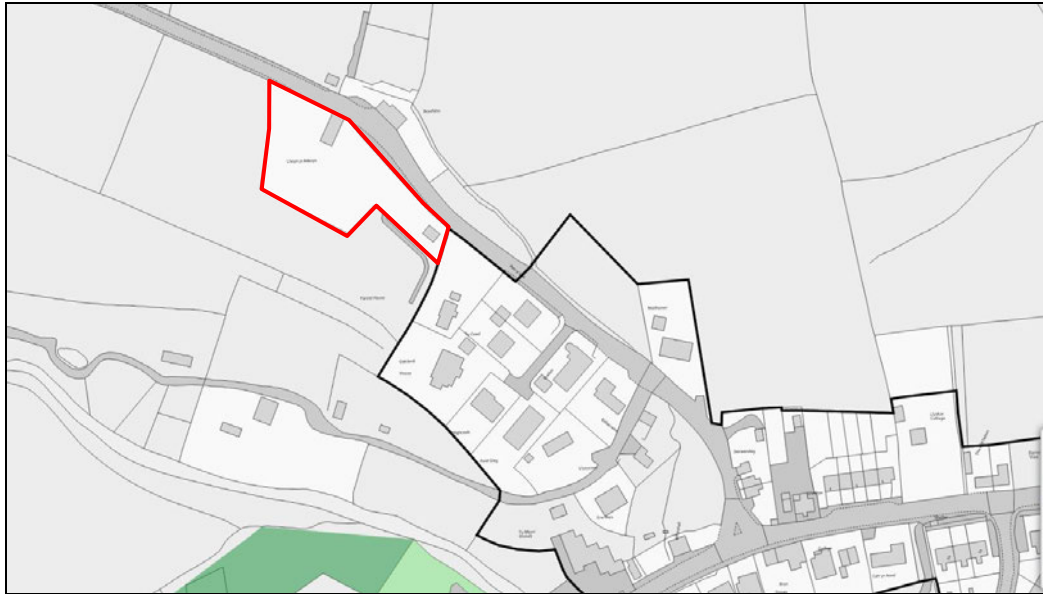
We are instructed by Mr. W. Lawrence to make a formal representation to the “soundness” of the Second Deposit Draft of the Carmarthenshire Local Development Plan.

Our client owns a residential property with accompanying small enclosure of land set at the north-western approaches to the village of Brechfa. The land falls to a roadside boundary with the C2104 Brechfa to Llanllwni Road. It is marked by the presence of a pair of a residential dwelling, together with a garden shed set alongside with its own independent vehicular access onto the C road. Our Client is seeking inclusion of a very modest parcel of land for future residential development within the defined settlement limits of Brechfa within the Replacement Local Development Plan.

This formal Representation relates solely to the non-inclusion of ALL of this established land within the draft settlement limits.

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



**Figure 1 – Extract from Second Draft of 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:

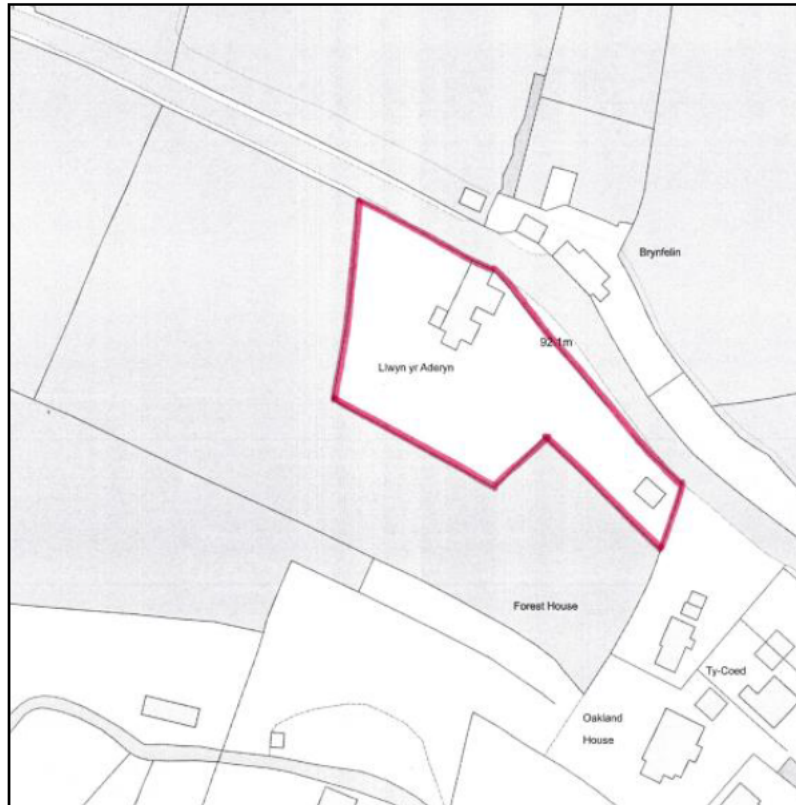
- Completed Deposit LDP Representation Form
- Location plan

## **Response to Council's Setting of Brechfa Draft Settlement Limits**

### **1.0 Integration of Site with Character and Setting of Locality**

- 1.1 The Representation Site consists of a generally level section of land, equipped with a residential dwelling as well as a garden shed. The Second Draft of the Replacement LDP has repeated the settlement limits currently adopted in 2014 and imposed settlement limits **carving adjacent to this section of land**, so the consequence is that the dwelling and adjoining land is set outside the settlement limits. There appears to be no logic or rationale reasoning for the segregation of the property in this manner, and the Representation merely seeks that part of our client's land to be included within defined settlement limits.

Figure 2 below illustrates the boundaries of the site in red of the Representation site, whilst Figure 3 provides a Google Earth reproduction of the aerial view of the site where the above features are graphically evident.



**Figure 2 – Location plan of site with boundaries edged in red**



**Figure 3 – Google Earth image of site compacted about the site vehicular access**

- 1.2 The Representation Site is shown in the following photographs where the distinction of the location of the settlement limits is shown.



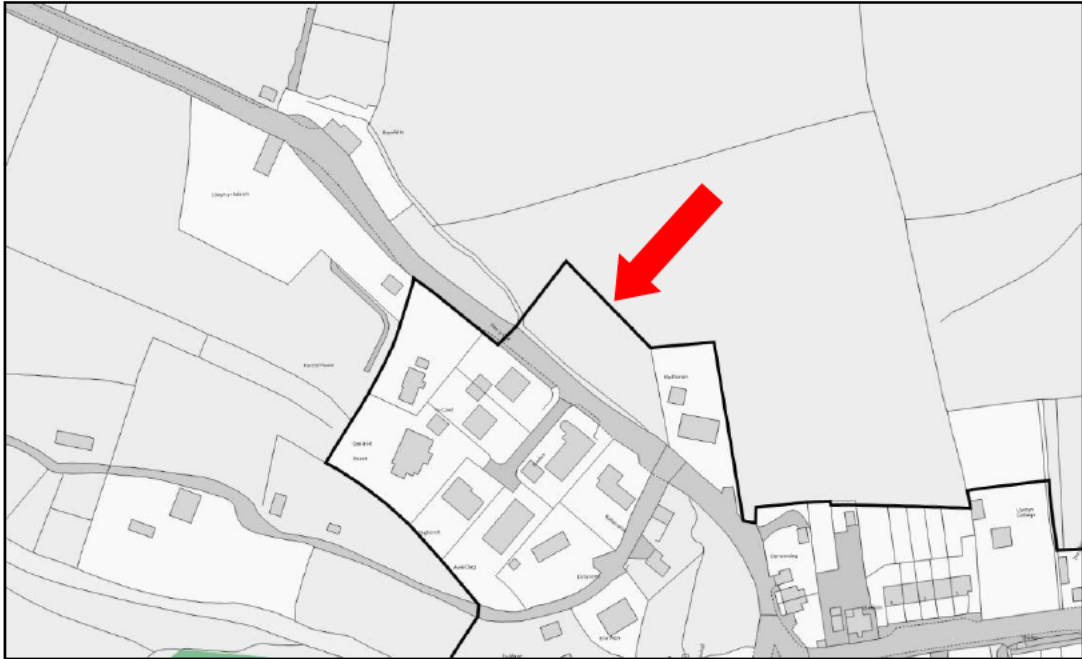
**Photo 1 – Representation Site entrance off C2104**



**Photo 2 – Site entrance along with current Settlement Limits**

### **Consistency within Settlement Limits**

- 1.3 Consistency in approach and application is critical in order for the planning system to be both effective and credible to all its users. Without it, the system itself becomes unsound and in the case of the determination of the development limits for Brechfa, the Authority has been found to be inconsistent.
- 1.4 Figure 4 below is an extract of the Deposit LDP Proposals Maps for an area just to the southeast of the Candidate Site at the northern edge of Brechfa.



**Figure 4 – Extract of Deposit LDP Proposals Map for Brechfa**

1.5 As can be seen, an undeveloped parcel of land has been included within the development limits of Brechfa at this location as part of the Deposit LDP, almost directly opposite the Representation Site.

1.6 It should be noted that we do not object to this form of alteration to the development limits, as it secures a varied form of available housing development opportunities for a community. However, its inclusion is a direct contrast and inconsistency to the Authority's decision to exclude our Client's land from the development limits. Combined with our Client's land representing a logical rounding-off of the respective area of the settlement, the exclusion of it would represent a clear inconsistency in approach taken by the Authority, resulting in the Plan as it stands being unsound.

## **2.0 Conclusion**

2.1 In conclusion, the Brechfa locality has numerous examples of minor additions to the extremities of defined settlement limits, where opportunities for new sensitive infilling development can be achieved such as the already developed curtilage of Llwyn yr Aderyn. This example is no different, resulting in it 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 Brechfa be 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