

Our Ref.: 1593a/RAB

Date: 26th March 2023

Forward Planning Manager
Place and Sustainability
Department of Sustainability and 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 Ms M. Davies
Land part of 115 Heol-y-Parc, Cefneithin**

We are instructed by Mrs M. Davies 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/026/002**, seeking inclusion of their land for future residential development within the defined settlement limits of Cefneithin within the Replacement Local Development Plan. The Candidate Site comprises an undeveloped field enclosure set primarily to the rear of residential properties which front the northern flank of Heol-y-Parc in Cefneithin. The site can be accessed off a surfaced driveway track which leads off Heol-y-Parc, and accordingly northwards to our client’s property, associated domestic outbuildings and garden space.

We have noted that the frontage proportion of the rear enclosure (within our clients’ ownership) is included within the Second Deposit draft settlement limits, **as part of Allocated Site PrC3/h8**. The client now wishes to seek inclusion of the remainder of the rear enclosure **as an extension of draft Allocated Site**.

This formal Representation proposes an Alternative Site to that already accepted as a Candidate Site in 2018, as shown edged in red at Figure 1 overleaf

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



Figure 1 – extent of Representation site edged in red

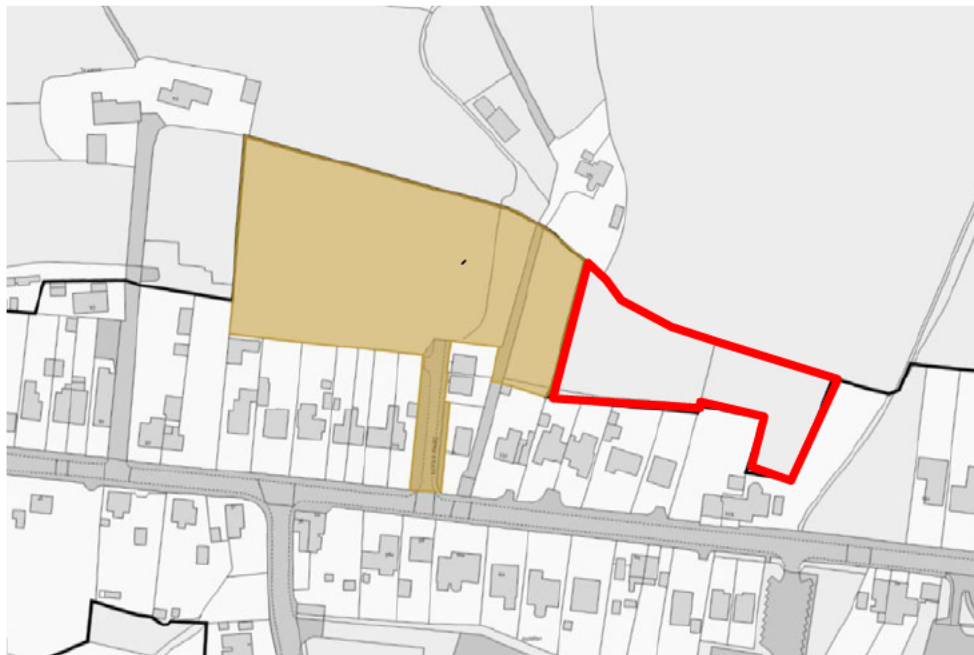


Figure 2 – Extract from Draft Proposals Map with Representation site edged in red

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

Justification for Inclusion of Enlarged Site within Settlement Limits

1. The proposals under this Representation merely seek the addition of circa 6 residential units to the overall housing supply of Cefneithin, which forms part of the principal service centre of Cross Hands, and within the Ammanford / Cross Hands Cluster as defined within the draft LDP. Figure 2 below provides an extract of the indicative site layout plan for this Representation site.



Figure 2 – Indicative Site Layout Plan of Representation Site

2. The Ammanford / Cross Hands Cluster aims to provide an additional **1267** residential units over the Plan period to 2033, and thus the addition of an allocated site of **only 6** units will not lead to an over-supply of dwellinghouses within the Cluster.
3. Only one site is allocated within the draft settlement limits of Cefneithin, that being Site PrC3/h8 "Heol-y-Parc". That site is expected to provide for 18 units, **part of which is included in land owned by our client**. This Representation seeks to extend that allocated site east to encompass the entire rear enclosure and add a further 6 units about a cul-de-sac arrangement.
4. It is considered that the settlement of the scale of Cefneithin is highly sustainable given its close proximity to Cross Hands and its wealth of retail, employment and community facilities. The addition of only one modest site in the village will not bring enough housing for the remainder of the new Plan Period. The addition of an

expanded site with only 6 further units will not place a burden on facilities, not the semi-rural backdrop to the settlement.

5. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, especially opposite, off the southern flank of Heol-y-Parc, which in turn, advocates that the form of development proposed off the northern flank of Heol-y-Parc is no different, resulting in it being respectful to the character and setting of the locality. The indicative site layout plan illustrates that new dwellings can be positioned to remain at a healthy and commensurate habitable distance from existing neighbouring properties backing on to the site from Heol-y-Parc.

We respectfully request that this Representation be given careful examination, and consequently the defined settlement limits of this part of Cefneithin realigned to include the Representation Site, as an expanded part of a Residential Allocation in the Proposals Map of the adopted Local Development Plan.

Yours sincerely,

A black rectangular box used to redact the signature of Richard A. Banks.

Richard A. Banks
Director

Enc.

Cc client