

Our Ref.: 1039a/RAB

Date: 27th March 2023

Forward Planning Manager
Place & 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 Mrs D. Davies
Land at Oaklands, Bronallt Road, Fforest**

We are instructed by Mrs D. 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/069/014**, seeking inclusion of their land for future residential development within the defined settlement limits of Hendy & Fforest within the Replacement Local Development Plan. The Candidate Site comprises the rear garden area of “Oaklands”, a substantial detached dwellinghouse which has two independent vehicular accesses onto Heol-y-Felin, and Bronallt Road respectively.

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 Hendy & Fforest, as contained within the 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), Stage 2A (Initial Detailed Site Assessment), Stage 2b (Further Detailed Site Assessment) and Stage 3 (Sustainability Appraisal and Habitat Regulation Assessment) of the Council’s site assessment.

It therefore crucially was **adjudged acceptable in all technical aspects** of formal assessment, but was only rejected at the final selection stage, with reasons for non-inclusion reported as follows:

“There is sufficient residential elsewhere allocated in the settlement. The site will remain outside of the development limits.

It is immediately apparent that the Council have **repeated the same conclusion** from when they published the First Draft of the Replacement LDP in January 2020.

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 Hendy & Fforest, 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 Hendy & Fforest, as reproduced below in Figure 1. The land should be appropriately allocated for housing under Policy HOM1 “Housing Allocations.”**

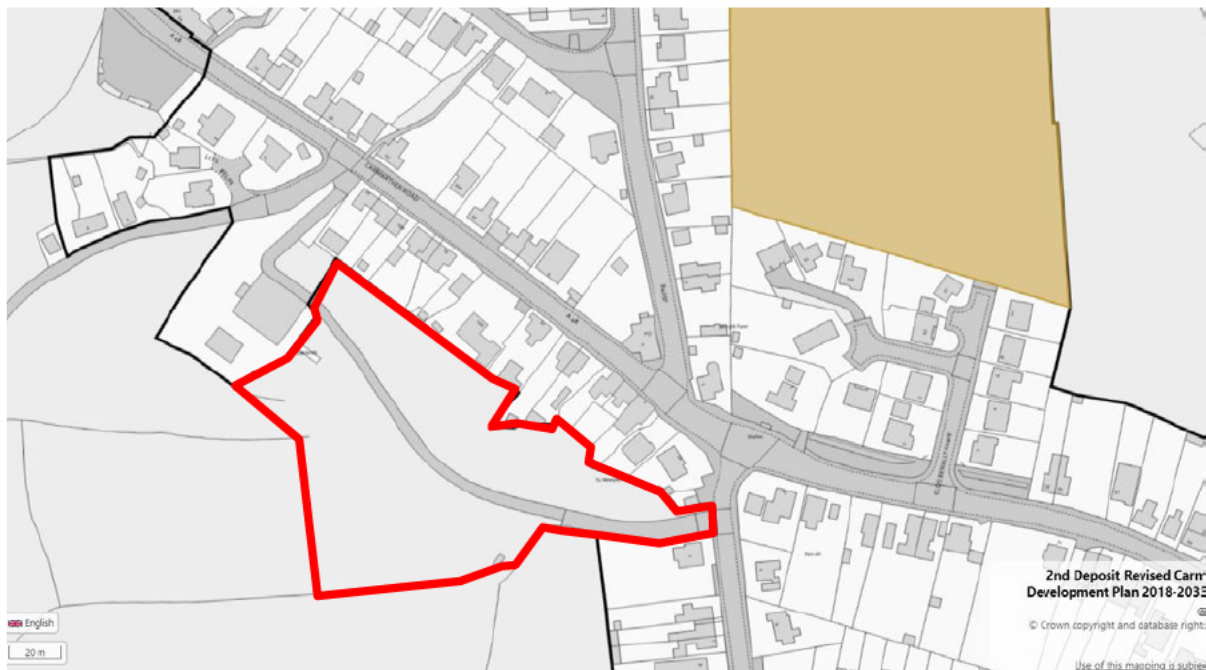


Figure 1 – Extract from Second Draft Proposals Map with site edged in red

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

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

1.0 Overall Housing Supply at Hendy & Fforest within Deposit Draft

1.1 The Council consider that the only reason for the Candidate Site at Oaklands not being included within the draft Plan as a Residential Allocation is that they believe that there are sufficient residential sites allocated elsewhere in the settlement. On this basis, it must be accepted that the form of the Candidate Site set to the rear of established properties which front Carmarthen Road (A48), together with the

proposals to utilise the existing vehicular access onto Bronallt Road (subject to appropriate widening and junction alignment) is deemed acceptable, and in accord with the spatial form and character of the settlement.

- 1.2 The proposals under this Representation merely seek the addition of circa 7 residential units to the overall housing supply of Hendy & Fforest, which forms part of the principal service centre centred upon the Llanelli 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

- 1.3 The Llanelli Cluster aims to provide an additional 2840 residential units over the Plan period to 2033, with Hendy & Fforest (Settlement SeC6) providing sites totalling 81 units to that overall Cluster total. We would submit in the first instance that the addition of an allocated site of 7 units will not lead to an over-supply of dwellinghouses within the Cluster, nor the defined Hendy & Fforest settlement supply.
- 1.4 We have examined and researched sites which have been brought forward as Residential Allocations with the Deposit Draft. In Hendy & Fforest, 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 3 below provides an extract from the Second Deposit Draft Schedule of Housing Sites from Policy HOM1.

Hendy / Fforest				
SeC6/h1	Llwyngwern	20	5	Year 1 - 5
SeC6/h2	Land between Clayton Road and East of Bronallt Road	20	2.2	Year 1 - 5 Year 6 - 10
SeC6/h3	Coed y Bronallt	6	Commuted Sum Contribution	Year 1 - 5 Year 6 - 10
SeC6/h4	Adjacent to Clos Benallt Fawr, Fforest	35	4	Year 1 - 5

Figure 3 - Schedule of Allocated Sites for Hendy & Fforest from Second Deposit Draft

This Schedule needs to be contrasted with the January 2020 Schedule as reproduced below at Figure 4, and it is noted that only Fforest Garage has been omitted. That site was indicated as capable of accommodating a total of **17 units**. Also SeC6/h2 at “Land between Clayton Road and East Of Bronallt Road” has been reduced in capacity **from 39 units in 2020 to 20 units in 2023**.

Hendy / Fforest		
SeC6/h1	Adjacent Clos Ty Gwyn	20
SeC6/h2	Land between Clayton Road and East of Bronallt Road	39
SeC6/h3	Coed y Bronallt	8
SeC6/h4	Adjacent to Clos Benallt Fawr, Fforest	35
SeC6/h5	Fforest Garage	17

Figure 4 – Deposit Draft Housing Schedule

- 1.5 In relation to land adjacent to Clos Benallt Fawr (SeC6/h4), we note all 35 houses at the site have since been completed. Site SeC6/h1 at Clos-Ty-Gwyn (Llwyngwern) has also been completed during the last LDP period of 2014-21.
- 1.6 However, we note that the Proposals Map in relation to “Fforest Garage” (SeC6/h5) and “Land between Clayton Road and East of Bronallt Road” (h2) has not altered. Both undeveloped sites remain allocated. In the case of the latter site off **Bronallt Road**, it has the benefit of planning permission for 8 detached houses, of which only two have been constructed. The 8 dwellings form a phase immediately off an estate road junction with Bronallt Road, and the phase is restricted to the north-western part of the entire allocation of 39 units, which stretches south over steeply sloping and

heavily undulating fields to the rear of Clayton Road. No planning permission has ever been sought for the majority of the site, despite the site being included in the Llanelli Borough Local Plan (1996), Carmarthenshire Unitary Development Plan (2003), and latterly the Local Development Plan (2014).

- 1.7 Consequently, twenty-five years of Development Plan allocations have elapsed without any signs of wholesale delivery of this site, apart from two units directly off the Bronallt Road frontage. Clearly, there is no historic demand for a site of this scale in this part of the Hendy area. It is almost certainly a physically challenging site, due to steep topography and the inability to adequately dispose of surface water, given there is no obvious watercourse receptor to deal with run-off from new development. Yet still the Council is prepared to allocate the site once again in a new Development Plan?

The allocation fails the test of soundness as the site is clearly unable to deliver any new housing. The Development Plans Manual (Edition 3) is quite clear with regard to rolling forward allocations and states that 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.*”. no evidence has been presented to demonstrate a change in circumstances to indicate the allocation will now be delivered.

- 1.8 The Council **has agreed with our client’s objection to the First Deposit Draft** and not allocated “**Fforest Garage**” with the Second Draft of the LDP. Nevertheless, it has **not sought to compensate** our client by re-allocating part of those proposed 17 units to our client’s site at Bronallt Road, where only 7 units are proposed. The substitution of sites, and particularly for one with a lower density and capacity, is unjust, and does not aim to deliver a sound plan as it relates to the Hendy & Forest sustainable settlement.
- 1.9 We submit that there is clear evidence in Llangennech, Hendy, Fforest and Llanedi that such modest sites are far more likely to be brought forward and developed in full by regional and small 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.
- 1.10 In the case of Oaklands at Bronallt Road, there are little signs within the immediate locality of properties for second sale, and no evidence of undeveloped land available within this part of the settlement limits, which is a strong indicator of a healthy property market at Hendy. Consequently, it is a location where housing proposals are **deliverable, assisting to meet housing needs** in this part of the Llanelli Cluster.

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 7-10 dwellinghouses will not appear at odds to the prevailing spatial pattern of development in Hendy and Fforest. 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 Oaklands 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 Fforest 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 the sender.

Richard A. Banks
Director

Enc.

Cc client