

Our Ref.: 1036a/RAB

Date: 6th April 2023

Forward Planning Manager
Place & Sustainability
Sustainability & Infrastructure Department
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 J.T.J. & Mrs C.W. Davies
Land at Parc-y-Ffynnon, Ferryside**

We are instructed by Mr J.T.J. & Mrs C.W. Davies to make a formal representation to the “soundness” of the Deposit Draft of the Carmarthenshire Local Development Plan.

Our clients made a formal Candidate Site Submission in August 2018, which was referenced SR/058/003, seeking inclusion of their land for future residential development within the defined settlement limits of Ferryside within the Replacement Local Development Plan.

The Candidate Site comprises a rectangular-shaped former grazing field set to the immediate rear of the Parc-y-Ffynnon residential estate, which was completed in 2019. Provision for future access into the rear field has been left over in two points.

We have noted that approximately half of the Candidate Site is included within the Second draft settlement limits as Residential Allocation Sec2/h2 capable of accommodating 12 residential units according to the housing schedule listed under Policy HOM1 of the Plan. However, the eastern half of the field has not been included.

This formal Representation relates solely to the unsuccessful part of the Candidate Site.

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 all the site was not selected for inclusion within the Second draft settlement limits of Ferryside, as contained within the Second 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 partially rejected at the final selection stage, with reasons for non-inclusion reported as follows: *"Part of the site is to be allocated with reference SeC2/h2."*

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 Second Deposit draft settlement limits for Ferryside, 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 Ferryside, 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 Allocation of only Half of Candidate Site

- 1.1 The Council have not provided any reasoning whatsoever for the draft allocation of only half the Candidate Site. The new settlement limit, as shown by Google Earth in Figure 2 below, **does not follow any defensible boundary**, such as a hedgerow, treeline or even dividing fence across the enclosure. Its positioning is therefore physically illogical in the context of adding new housing to this part of Ferryside.



Figure 2 – Google Earth (April 2021) – illustrating the cultivated form of the Candidate Site

- 1.2 We therefore consider that the Council has adopted this rather inconsistent approach on the basis that it only considers that Ferryside should grow by very minor proportions over the Plan Period to 2033. However, the village is significant in scale, containing several hundred dwellinghouses, primary school, convenience shops, public houses, education centre and railway station. It also possesses good public bus service connections to Carmarthen and Llanelli, with the X11 service calling en-route to Swansea City Centre. In other words, it is highly sustainable as a place to live, work and also continue to accommodate holidaymakers. The village contains several guest houses, caravan and chalet parks serving the tourist sector.

- 1.3 The Representation Site indicative site layout plan is reproduced below as Figure 3. It illustrates for cul-de-sac form of development with a total of 23 detached and semi-detached dwellinghouses set fronting an internal estate road, which can access the site via two independent access points from the Parc-y-Ffynnon estate. Thus the proposed form of layout and development is complementary in form to adjacent established form of residential layout at Parc-y-Ffynnon, with frontage parking, and traditional rear garden space.
- 1.4 The draft Allocation for only 12 units indicates that one access would be used, being the western access, and thus it would require amendments to the site layout to ensure all vehicles access and egress through that single access.
- 1.5 We submit that the Candidate Site encompasses the entire rear, south-eastern boundary of Parc-y-Ffynnon properties and thus complemented that entire development in width and form. The proposed draft allocation in only proposing half that area fails to respect that character, and in committing to allocate land beyond the previous LDP settlement limits, our clients cannot understand the physical logic in not extending the draft allocation over the entire field. The Candidate Site field exhibits a consistent gradient and form across its entire length, and therefore the excluded eastern half bears no difference in profile and physical form to the western draft allocated half.
- 1.6 Google Earth provides such graphic evidence that the allocation of the whole field will not pose any detriment to the visual amenities of the locality. The eastern perimeter stands as a tall and proud hedgerow, with mature, tall trees to the rear extent. Coupled with the lower ground being dominated by adjoining modern houses, any viewer from public viewpoints on ground east, west and north of Parc-y-Ffynnon will have no ready appreciation that the Candidate Site is wholly developed as opposed to only half developed as suggested by the Council. There is no public access to land to the south given it is significantly higher in contour level, steep and impassable with dense woodland vegetation. It nevertheless presents a “green blanket” or backdrop to the modest expansion southwards of Parc-y-Ffynnon.



Figure 3 – Indicative site layout plan of proposed Representation Site

2.0 Overall Housing Supply at Ferryside & Carmarthen Cluster

2.1 The proposals under this Representation merely seek the addition of a further 11 residential units to the overall housing supply of Ferryside, to add to the 12 units already allocated within the draft Plan. Ferryside is defined as a **Tier 2 Service Centre**, and lends to the principal service centre centring upon the Carmarthen Cluster as defined within the draft LDP.

The Carmarthen Cluster aims to provide an additional 1646 residential units over the Plan period to 2033, and thus the addition of a larger allocated site at Ferryside of 23, rather than the current draft of 12 units will not lead to an over-supply of dwellinghouses within the Cluster. The LDP village classification as a **Tier 2 Service Centre implies that it possesses far more community facilities and public transport links than a typical Carmarthenshire village**. Accordingly, it should be afforded a reasonable level of future housing growth for the next 10 years.

2.2 Ferryside is quite unique in terms of its positioning and setting being part of the Carmarthen Cluster. It is placed at the south-eastern extremity of the defined area, bordering the Llanelli Cluster, and its extremity settlements such as Kidwelly. Ferryside serves a rural hinterland and is the **principal settlement off the eastern**

banks of the Towy Estuary, and consequently, there are few other defined settlements in this part of the County which contain specific residential allocations.

2.3 Policy HOM1 provides details of the two allocations in Ferryside as shown below.

Ferryside				
Sec2/h1	Caradog Court	12	Commuted Sum Contribution	Year 1 - 5 Year 6 - 10
Sec2/h2	Land to the rear of Parc y Ffynnon	12	1.2	Year 6 - 10 Year 11 - 15

Figure 4 – Policy HOM1 Residential Allocations at Ferryside

Only one other site is allocated in Ferryside that relates to 12 residential units at “*Caradog Court*”. It benefits from an extant planning permission dating from 2011, and has been mostly completed, albeit a range of modest, two-bedroomed linked units form the bulk of the remaining allocation of 12 units as defined in the draft Allocation. That site is “carried over” in allocation from the previous 2008-21 LDP.

2.4 We have therefore examined and researched sites which have been brought forward as Residential Allocations with the Second Deposit Draft in the Carmarthen Cluster. The Cluster extends in geographic area to Bronwydd, Cynwyl Elfed, Peniel, Rhydargaeau, Alltwalis and Llanpumsaint to the north of the town. It stretches south-west to Llansteffan and Llangain, and east along the River Towy to include Nantgaredig, Pontargothi, Llanarthney and Capel Dewi. It extends along the A48 road as far as Llanddarog and Porthyrhyd. Finally, it stretches south-east along the Towy Estuary to include Cwmffrwd and Ferryside and partly along the Gwendraeth Valley to Pontyates. The following allocations are noted for their inactivity and undeliverability over the last 8-9 years.

2.5 **West Carmarthen (PrC1/MU1) – 700 UNITS**

In Carmarthen, great emphasis within the Draft Plan has been placed upon the continued allocation of a large, proposed housing site at **West Carmarthen. The site is allocated for 700 residential units as Site PrC1/MU1.**

This allocation forms the bulk of a Residential Allocation carried over from the current LDP (2014-21) where the allocation was for 1100 units.

We have calculated that of that 1100 units only a total of 141 were constructed between the Plan Adoption date of December 2014 and start of this Replacement LDP Plan Period of 2018. Since 2018, a further 90 units have been constructed, and we note from Land Registry records that the last completed unit was sold at Maes Macsen in September 2021 (18 months ago).

Therefore, since adoption of the 2014 LDP, only a total of 231 units have been completed, equating to a build rate over that 7-year period of **only 33 units per annum**. This build rate is considerably lower than the anticipated and much promised

delivery of 1100 units in the Plan Period of 2014 to 2021, **which would have expected an annual build rate of 157 units.** An actual return of 33 units per annum equates **to only a 21% build rate return** on that anticipated for delivery in the 2014-21 Plan.

Only 39 of those units were built in 2017-18 accordingly to the Joint Housing Land Availability Study 2018. The 2019 Study reveals that only a further 5 units were constructed in 2018-19. The August 2019 Study reports that **none were under-construction at that time.** During 2020 and 2021 when Covid-19 restrictions were at their peak, more units were constructed than at any other time in that LDP plan period, and therefore we would submit at this point in our formal objection that **low build rates cannot be held to be reduced as a consequence of Covid-19 restrictions.**

It is equally noteworthy that at a time when the housing market was at its most buoyant in 2022, that the only housebuilder with a track record on the site had ceased construction and sold their last completion (September 2021). We submit that this is testament to the weak marketability of the West Carmarthen Site.

Only 231 units out of 1100 units of the Strategic Site have therefore been completed in the 2014-21 LDP period, which equates to **only 21%** of that allocated total.

The Replacement LDP seeks to delivery 700 units over a Plan Period from 2018 to 2033. The extract from the Proposals Map for Carmarthen reveals that the figure includes for 90 units constructed between 2018 and 2021, leaving a balance of **610 units envisaged in the remainder of the Plan Period to 2033.** That would equate to a build rate of **61 units per annum over a 10-year period.** Based upon previous build rates at this site, such a predicted build rate can be described as overly optimistic, being nearly double that actually achieved on the site to date.

The West Carmarthen draft allocation includes parcels of residential allocations off the flanks of the A40 that were previously allocated within the Carmarthen District Local Plan (1997), and subsequent Carmarthenshire Unitary Development Plan (2003). No progress was made in bringing the sites at Llysonnen Road and Old St. Clears Road forward, and yet it was allocated within the Local Development Plan in 2014. Consequently, twenty-seven years of Development Plan allocations have elapsed without any signs of delivery of the majority of this site.

Clearly, there is no historic demand for a site of this scale in this part of Carmarthen. More physically challenging sites, such as the Roman Park site in Llangunnor by Redrow Homes, and the Mount Pleasant site, also in Llangunnor, by Lovell Homes have come forward, and been fully completed, long before West Carmarthen. Yet still the Council is prepared to allocate the site once again for hundreds of residential units in a new Development Plan.

2.6 Pibwrlwyd (Site PrC1/MU2) – ALLOCATION OF 247 UNITS

We would also question the allocation of land at **Pibwrlwyd** in Carmarthen, being partly for a residential development of 247 units on the Parc Pibwrlwyd development. The Council published and subsequently adopted Supplementary Planning Guidance on “Pibwrlwyd” in 2014.

Paragraph 3.2 was quite specific in that “*The LDP describes the acceptable uses on the site as follows: “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.” (self-emphasis)

The Council has seen fit to re-examine the Development Plan status of this Mixed-Use Site and concluded that residential uses should now be brought forward, with a residential capacity of 247 units. No explanation has been provided within the supporting text to LDP policies to warrant a dramatic departure from the adopted SPG.

The site is completely and physically divorced from established housing at Pensarn and Llangunnor. 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.

New housing at this location would accordingly be quite alien in form to the long-established business and education uses at Pibwrlwyd.

2.7 Land off Parc-y-Delyn (PrC1/h4) – ALLOCATED FOR 17 UNITS

This new allocation suffers from including Tree Preservation Orders imposed upon specimens at the proposed vehicle access onto Parc-y-Delyn. The site also appears covered in rich flora and fauna and could harbour biodiversity interests.

- 2.8 As referenced at the outset of this Section, there are several **satellite settlements about Carmarthen** contributing housing allocations to the Cluster Total of 1690 dwellings. However, we have discovered that many allocations have simply and conveniently been “rolled over” from the 2014 adopted LDP, or in some cases even earlier from the 2008 Unitary Development Plan. No explanation, evidence or demonstration of viability or deliverability has been provided within the Site Assessment Table (January 2023) to demonstrate such a widespread practice.

The following sites are examples of such dormant sites:

Cae Camfas, Heol Llanelli, Pontyates (SeC1/h4) – ALLOCATED FOR 8 UNITS

This site in Pontyates was allocated in 2014 in the Local Development Plan, and yet no applications for planning permission have been submitted in the entire 8 years of the Plan Period.

2.9 **Gwyn Villa, Llanpumsaint (SuV12/h1) – ALLOCATED FOR 20 UNITS**

This site in Llanpumsaint was allocated in 2014 in the Local Development Plan, and yet no applications for planning permission have been submitted in the entire 8 years of the Plan Period.

2.10 **Fronheulog, Cynwyl Elfed (SuV1/h1) – ALLOCATED FOR 8 UNITS**

This site in Cynwyl Elfed was allocated in 2014 in the Local Development Plan, and also the 2008 UDP, and applications for planning permission have been submitted for only two individual houses in the entire 15 years of the above combined Plan Periods have been commenced.

2.11 We submit that the above draft allocations at West Carmarthen be significantly reduced in scale, and in the case of Pibwrlwyd and above-named satellite allocations be omitted from the Plan and that housing allocation be redistributed to modest Candidate Sites, of up to 20-30 units such as that proposed at Parc-y-Ffynnon. There is clear evidence in the rapid completion of the adjoining Parc-y-Ffynnon development 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.

2.13 In the case of Parc-y-Ffynnon, 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 Ferryside. Consequently, it is a location where housing proposals are **deliverable, assisting to meet housing needs** in this part of the Carmarthen Cluster.

CONCLUSION

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 all the Candidate Site.

Our clients have illustrated that their indicative proposals to construct a total of 23 dwellinghouses will not appear at odds to the prevailing spatial pattern of development in Ferryside. The locality has numerous examples of modern cul-de-sac development being completed at backland / edge of settlement locations, which in turn, advocates that the form of development proposed at Parc-y-Ffynnon is no different, resulting in it being respectful to the character and setting of the locality. **The Council have already acknowledged that a backland site is suitable at this location in Ferryside**, our clients merely suggest that it be enlarged to encompass **all** the level field to a parallel position with the constructed Parc-y-Ffynnon development.

We respectfully request that this Representation be given careful examination, and consequently the defined settlement limits of this part of Ferryside realigned to include the whole 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 Richard A. Banks.

Richard A. Banks
Director

Enc.

Cc client