

Our Ref.: 1097a/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 O. Evans
Land part of Penllwynio Farm, and rear of Haulfan, Llanddarog**

We are instructed by Mr O. Evans 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/078/004**, seeking inclusion of their land for future residential development within the defined settlement limits of Llanddarog within the Replacement Local Development Plan. The Candidate Site comprises an irregular-shaped former grazing field set to the immediate rear of a detached property, known as Haulfan and its side garden fronting the principal highway in Llanddarog. The residential estate of Brynhyfryd forms a common perimeter with the entire western boundary of the Candidate Site. Three detached bungalows which front the unclassified road to Penllwynio Farm have rear gardens which form the continuous eastern perimeter with the Site.

We have noted that **approximately half** of the Candidate Site is included within the draft settlement limits as Residential Allocation SuV19/h2, apparently capable of accommodating 10 residential units according to the housing schedule listed under Policy HOM1 of the Plan. However, the southern 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 the site was not selected for inclusion within the draft settlement limits of Llanddarog, 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 partially rejected at the final selection stage, with reasons for non-inclusion reported as follows:

Part of the site will be allocated for residential development. Site to be allocated with reference SuV19/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 Llanddarog, 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 Llanddarog, as reproduced below in Figure 1. The land should be appropriately allocated for housing under Policy HOM1 "Housing Allocations."**

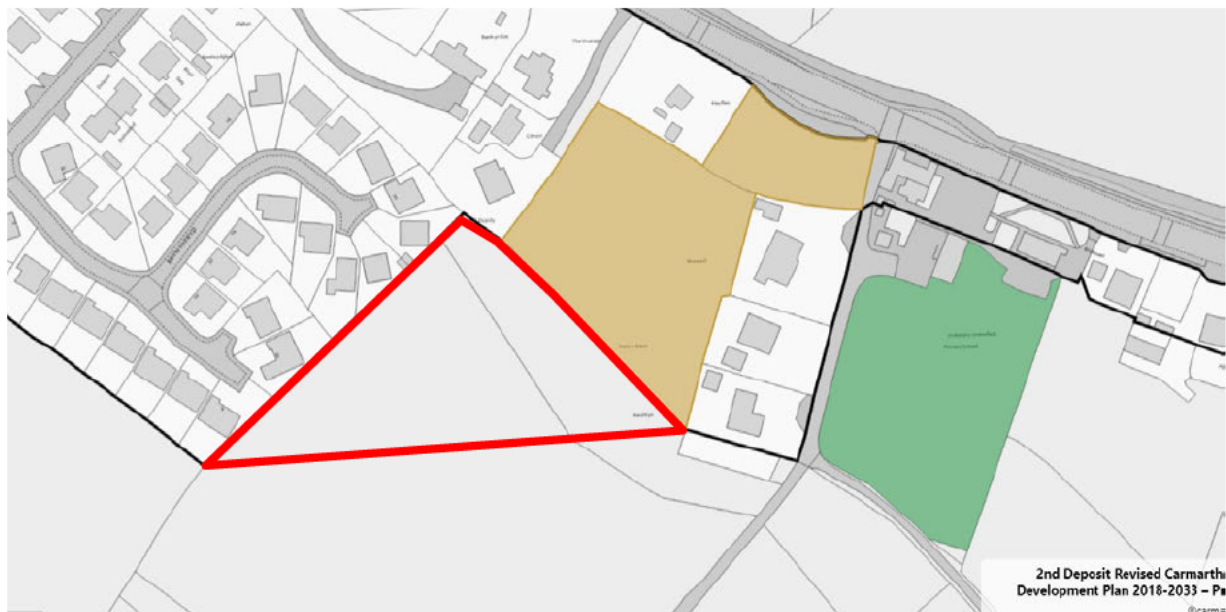


Figure 1 – Extract from Proposals Map with Representation site edged in red

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

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

1.0 Allocation of only Half Candidate Site

- 1.1 The Council have **not provided** any reasoning for the allocation of only half the Candidate Site. The new settlement limit, as shown in Figure 1 above, **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 Llanddarog. Google Earth provides an illustration of the physical features of this part of Llanddarog and is reproduced in Figure 2 below.

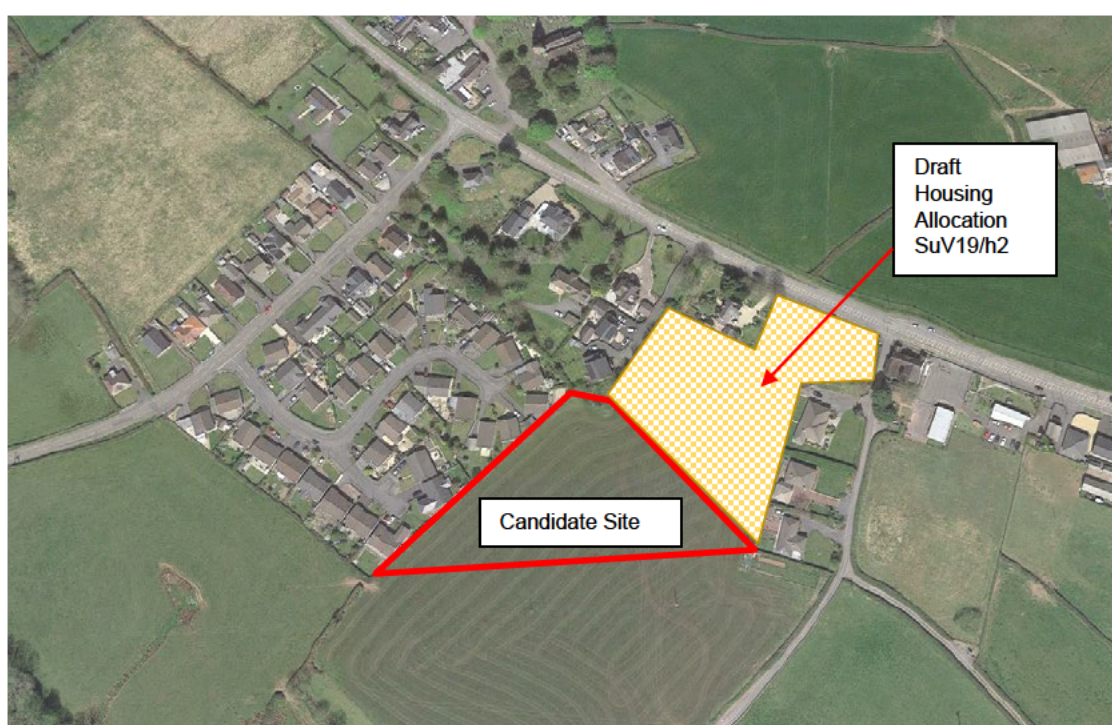


Figure 2 – Google Earth (April 2021) – illustrating the cultivated form of the Candidate Site

- 1.2 We therefore consider that the Council has adopted this rather inconsistent approach on the basis that it only considers that Llanddarog should grow by very minor proportions over the Plan Period to 2033. However, the village is significant in scale, containing over one hundred dwellinghouses, primary school, two public houses, post office and village hall. It also possesses good public bus service connections to Carmarthen and Llanelli. **In other words, it is highly sustainable as a place to live and work.**
- 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 29 detached and semi-detached dwellinghouses and bungalows set fronting an internal estate road, which can access the site via an access through the side garden area of Haulfan, where

three detached properties can be formed fronting the main Llanddarog highway. The the proposed form of layout and development is complementary in form to adjacent established form of residential layout at Brynhyfryd.

- 1.4 The draft Allocation for only 10 units indicates that the same single access would be used, and still allow for three detached dwellings to the road frontage, and thus only 7 units to the rear field. However, contour levels within this rear field are fairly consistent, meaning that any short or long distance views from the south at this field would gain an appreciation of new housing falling against a backdrop of established properties at Brynhyfryd and Penllwynio Road, regardless of the number and extent of the site in land area. **The proposals do not encroach the proposed site so far south into open countryside that it extends beyond the physical confines of the two flanks of residential development set off either side.**
- 1.5 We submit that the Candidate Site encompasses the entire rear, eastern boundary of Brynhyfryd properties and thus complemented that entire development in depth 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.

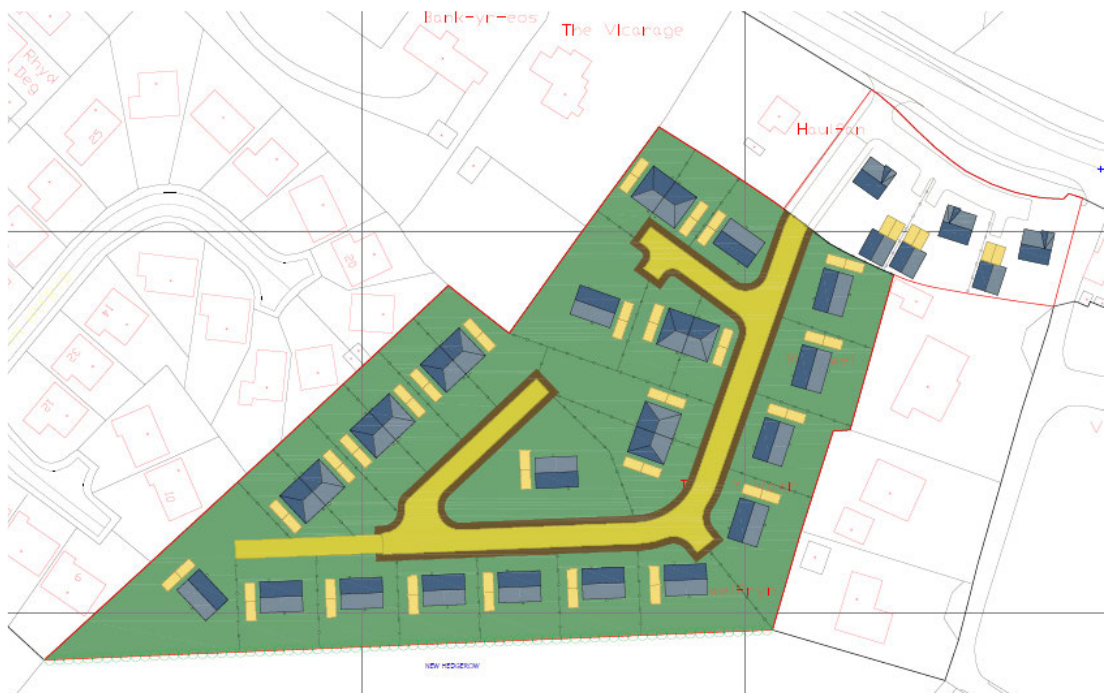


Figure 3 – Indicative site layout plan of proposed Representation Site

2.0 Overall Housing Supply at Llanddarog & Carmarthen Cluster

- 2.1 The proposals under this Representation merely seek the addition of a further 19 residential units to the overall housing supply of Llanddarog, to add to the 10 units already allocated within the Second draft Plan. Llanddarog is defined as sustainable settlement, (SuV19), and lends to the principal service centre centring upon the Carmarthen Cluster as defined within the Second draft LDP.
- 2.2 The Carmarthen Cluster aims to provide an additional 1690 residential units over the Plan period 2018- 2033, and thus the addition of an additional 19 units to an already allocated site at Llanddarog to reach a combined total of 29, units will not lead to an over-supply of dwellinghouses within the Cluster.
- 2.3 Llanddarog 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 Cross Hands / Ammanford Cluster. Llanddarog together with Porthyrhyd serves a rural hinterland and are the **principal settlements off the A48 Trunk Road between Carmarthen and Cross Hands**. Consequently, there are few other defined settlements in this part of the County which contain specific residential allocations. Policy HOM1 provides details of the two allocations in Llanddarog and only one at Porthyrhyd, as shown below.

Llanddarog				
SuV19/h1	Land Opp. Village Hall	16	3.2	Year 6 - 10
SuV19/h2	Land adj. and the r/o Haulfan	10	1	Year 6 - 10 Year 11 - 15
Porthyrhyd				
SuV20/h1	Land adjacent to Llwynhenry Farm	6	Commuted Sum Contribution	Year 6 - 10 Year 11 - 15

Figure 4 – Policy HOM1 Residential Allocations at Llanddarog & Porthyrhyd

- 2.4 Only one other site is allocated in Llanddarog that relates to 16 residential units (SuV19/h1) at “*Land opposite the Village Hall*” It benefits from Approval of Reserved Matters for a mix of three and four bed two-storey houses about a cul-de-sac layout. We note the Applicant is currently seeking relaxation to the extant Section 106 Agreement imposed upon the permission to reduce the number of Affordable Houses on the site from 3 to 2 in number.
- 2.5 Porthyrhyd is rather broadly equal in village scale to Llanddarog, and yet in the Second Draft Plan only one small site for 6 units is allocated at Llwynhenry Farm (SuV20/h1).

2.6 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, Pontarogthi, 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.

2.7 **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.

2.7 **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.

2.8 **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.

- 2.9 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.

2.10 **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.

2.11 **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 the entire 15 years of the above combined Plan Periods have been commenced.

- 2.12 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 Penllwynio Farm. There is clear evidence in Llanddarog, such as the progress to a detailed scheme at the Village Hall site, 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 Penllwynio Farm, 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 Llanddarog. 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 29 dwellinghouses will not appear at odds to the prevailing spatial pattern of development in Llanddarog. 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 Penllwynio Farm 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 Llanddarog**, our clients merely suggest that it be enlarged to encompass all the level field to a parallel position with the Brynhyfryd estate.

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

Yours sincerely,



Richard A. Banks
Director

Enc.

Cc client