

Our Ref.: 1123a/RAB

Date: 31<sup>st</sup> March 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. Lewis & Mr. S. Price  
Land off Pontardulais Road, Tycroes, Ammanford**

We are instructed by Mr. J. Lewis & Mr S. Price 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/159/011**, seeking inclusion of their land for future residential development within the defined settlement limits of Tycroes within the Replacement Local Development Plan. The Candidate Site comprises the frontage of a field enclosure set off the southern flank of Pontardulais Road (A483 road) and lying immediately adjoining the Tycroes Business Park, with its associated individual dwellinghouses fronting its access road.

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 Tycroes, as contained within the Second Deposit Draft.

We note that the submission successfully passed through all two Assessment Stages, being Stage 1 (site compatible against the location of future growth presented in the Preferred Strategy), and Stage 2A (Initial Detailed Site Assessment). It did not advance to Stage 2b (Further Detailed Site Assessment) and Stage 3 (Sustainability Appraisal and Habitat Regulation Assessment) of the Council’s site assessment.

The Site Assessment Table reports the reasons for non-inclusion as follows:

*“There is sufficient and more suitable land available in Tycroes to meet its housing needs which is better related and in closer proximity to the services and facilities in the village, the site in question does not relate as well to these facilities.”*

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 Tycores, 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 Tycores, as reproduced below in Figure 1. The settlement limits should also include the adjoining Brynteg Garage cluster of buildings and yard, and thus resemble the limits about Coopers to the west.**



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

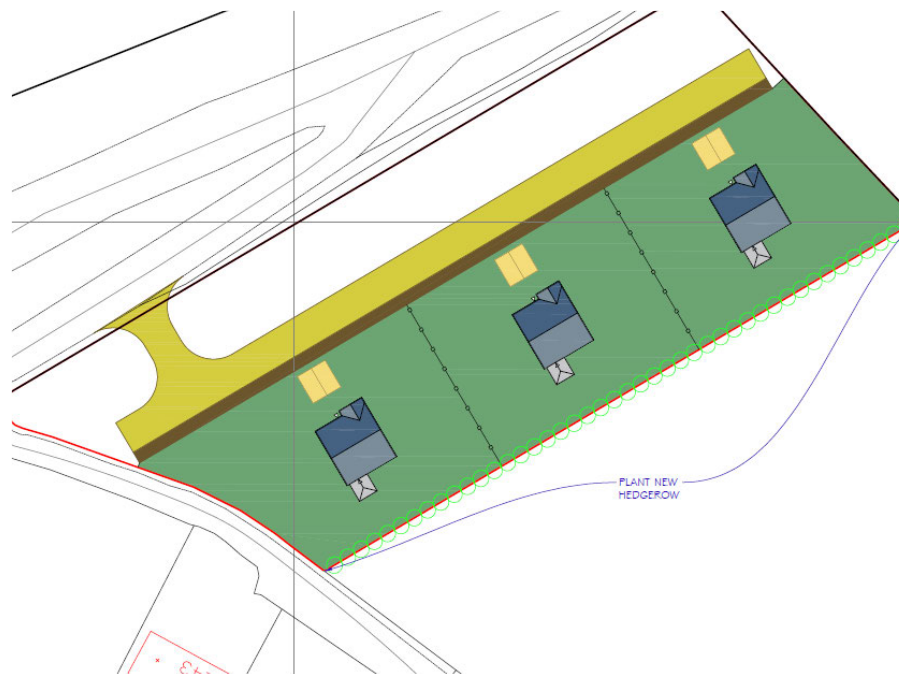
This formal representation letter supplements the following documents which comprise a complete submission to the Second Deposit Draft Consultation stage:

- Completed Deposit LDP Representation Form
- Copy of Candidate Site Submission Report (August 2018)

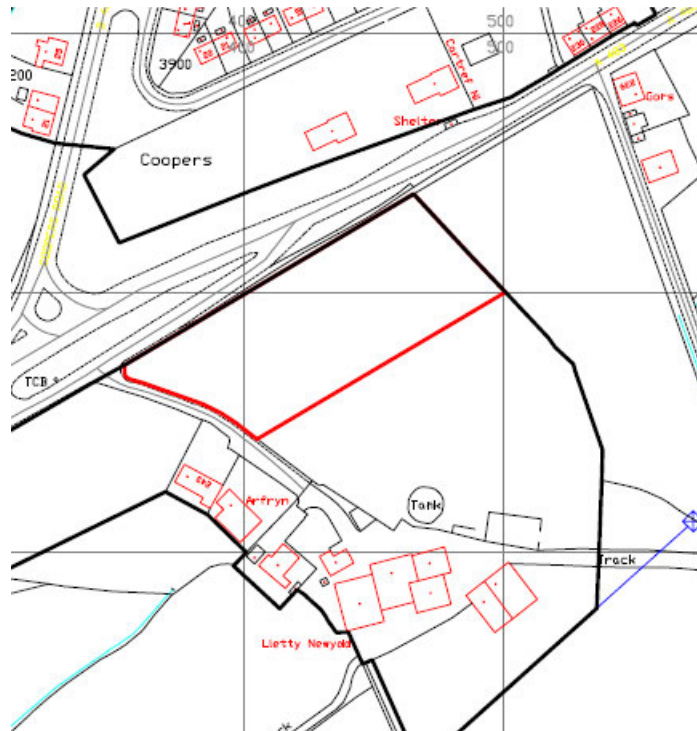
## **Response to Council's Reasons for Non-Inclusion of Site within Settlement Limits**

### **1.0 Overall Housing Supply in Tycroes**

- 1.1 The Council consider that the only reason for the Candidate Site at Pontardulais Road not being included within the Second draft Plan as a Residential Allocation is that they believe that there are sufficient residential sites allocated elsewhere in the settlement. They also comment that this site is not well related to settlement facilities.
- 1.2 The proposals under this Representation merely seek the addition THREE residential units to the overall housing supply of Tycroes, which forms part of the principal service centre centred upon the Ammanford Cluster as defined within the draft LDP. Figures 2 & 3 below provides an extract of the indicative site layout plan and location plan for this Representation site.



**Figure 2 – Indicative site layout plan of Representation Site**



**Figure 3 – location plan of site, edged in red for identification**

1.3 The field frontage in question lies at a highly sustainable position along the trunk road, which would allow new residents to continue to access the excellent community facilities in the locality, such as the nearby Capel Hendre Industrial Estate, Tycroes Business Park, Tycroes and Saron Primary Schools, convenience shops at Tycroes Square and main bus route that includes Pontardulais Road, **with X13 services calling every 20 minutes between Ammanford and Swansea.**

## **2.0 Consistency with Other Policies of the Deposit LDP**

2.1 The Authority has provided no specific indication or guidance on how it has determined and defined development limits within the Deposit LDP. It has therefore been difficult to ascertain why some sites have been successfully included and others have not, which is discussed further below. However, Policy HOM3 deals with small extensions to existing rural villages and so provides a useful series of criteria in determining where such extensions would be acceptable, namely the following:

- Minor infill or a small gap between the existing built form; or
- Logical extensions and/or rounding off of the development pattern that fits in with the character of the village form and landscape; or

2.2 It is logical therefore that the same assessment criteria should be utilised in assessing whether or not a candidate site would make an acceptable addition to existing development limits. Taking our client's land into consideration, together with the actual 'on-the-ground' physical attributes of adjoining and nearby land and its use, it is clear that it would adhere to the second criteria listed above and so should in turn have been included within the defined development limits of Tycroes. The land

in question if developed is set within a small number of dwellings would appear as a recognised grouping of established development immediately alongside the remainder of the settlement. Its exclusion would be inconsistent with the provisions of Policy HOM3 and indeed decisions taken by the Authority with regard to other sites within the Plan area. As a result, and on this basis alone, the Plan as it currently stands is unsound.

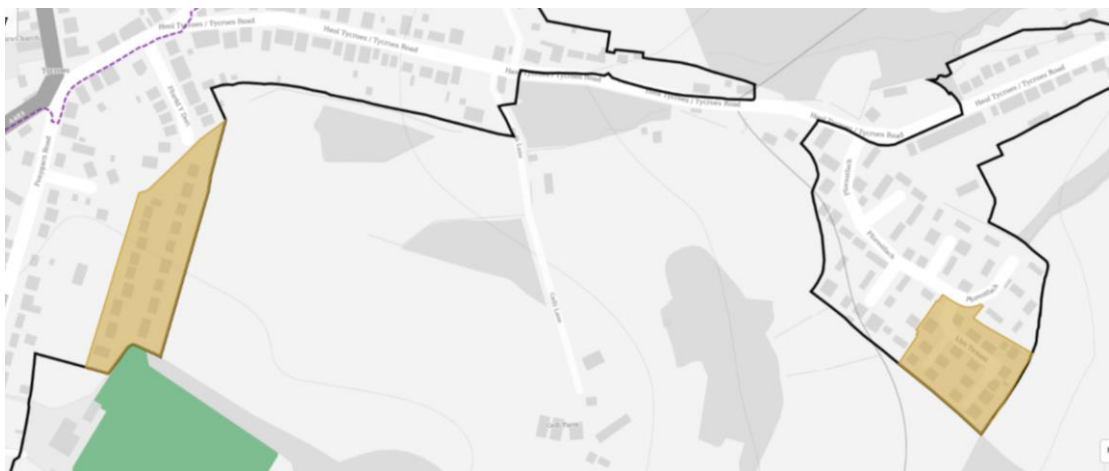
### 3.0 **Housing Land Availability in Second LDP Draft**

3.1 The Ammanford / Cross Hands Cluster aims to provide an additional **1257** residential units over the Plan period to 2033, and thus the adjustment of the settlement limits to provide an additional 3 units will not lead to an over-supply of dwellinghouses within the Cluster. **The Council consider there to better sites allocated for future development within the Second LDP Draft.**

3.2 We have therefore examined and researched sites which have been brought forward as Residential Allocations with the Deposit Draft. Only two sites are allocated for housing in Tycroes, but in both cases those allocations **have already been fully completed.** Figure 4 below illustrates those two sites at Fforestfach, off Heol Tycroes, and land off Ffordd y Deri by Pobl Group, adjoining the Rugby Club.

Tycroes		
PrC3/h31	Land at Fforestfach	17
PrC3/h32	*Land south of Tycroes Road	37

**Extract from Policy HOM1 indicating only two sites for housing in Tycroes**



**Figure 4 – Both allocations in Tycroes are now fully completed before the Replacement LDP is even adopted**

- 3.3 We have examined and researched sites which have been brought forward as Residential Allocations with the Second Deposit Draft. On behalf of clients in this LDP Cluster, we have made formal Representations seeking the omission of the following draft Allocations:

**Site PrC3/h4 - Tirychen Farm, Dyffryn Road, Penybank - for 150 units.**

Planning permission was last granted in 2014 for 289 dwellings, under Application E/21633. However, that permission was **only granted in outline form**. It subsequently lapsed, and the landowners sought to vary conditions upon that permission to extend the validity of the outline permission. That Variation of Condition application was finally approved in October 2019, under Application E/38686.

The recently approved Variation of Condition permission does little to display any real progress in the deliverability of the site. It merely amounts to the landowners seeking to continue to benefit from an outline planning permission at the site. Full planning permission was granted as far back as 1992 (D6/19332), which subsequently lapsed. The Land continued to be allocated within the Dinefwr Local Plan (1996), and subsequent Carmarthenshire Unitary Development Plan (2003). No progress was made in bringing the site forward, and yet it was allocated within the Local Development Plan in 2014. Consequently, **thirty years of Development Plan allocations** have elapsed without any signs of delivery of this site. Clearly, there is no historic demand for a site of this scale in this part of the Ammanford area. More physically challenging sites, such as the re-development of the Betws Colliery site at Betws and Cae Pound at Cross Hands West Tip have come forward long before Tirychen, and yet still the Council is prepared to allocate the site once again in a new Development Plan.

The decision to retain Tirychen Farm after a period of 30 years within the LDP is shown to be inconsistent, as does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability.

- 3.4 **Site PrC3/h22 Land at Pant-y-Blodau in Penygroes for 79 units.**

The site was allocated as GA3/h35 in the Adopted 2014 LDP for 90 units. Planning Permission was granted in April 2015, and yet some 8 years later, no work has been undertaken on the site, and the land remains undeveloped. No indication is provided within the Site Assessment Report (January 2023) as to why the Council consider this long-standing allocation to remain in the Plan?

- 3.5 We submit that the draft allocations at Tirychen and Pantyblodau be omitted from the Plan, and that housing allocations be redistributed to modest Candidate Sites, such as the additional 3 units proposed off Pontardulais Road.

- 3.6 There is clear evidence in Tycroes, Capel Hendre and Saron 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.

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 three dwellinghouses at a prominent junction of Pontardulais Road and the Tycroes Business Park, and which will not appear at odds to the prevailing spatial pattern of development in Tycroes and Coopers. The locality has numerous examples of modern clustered development being completed at road frontages along the trunk road, which in turn, advocates that the form of development proposed at Pontardulais 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 Tycroes realigned to include the Representation Site 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 clients