

Our Ref.: 1053a/RAB

Date: 27th March 2023

Forward Planning Manager
Place & Sustainability
Department of Sustainability & 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 Mr P. & Mrs J. Knight
Land at Hendre Road, Tycroes, Ammanford**

We are instructed by Mr P. & Mrs J. Knight 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/159/008**, 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 comprised two parts, being a former commercial yard, which fronts the northern flank of Hendre Road, set between established residential properties. The second part of the Candidate Site was the immediately adjoining former grazing field to the rear of the frontage yard, with access derived to that field through the frontage yard.

Planning permission has subsequently been granted to construct detached dwellinghouses across the site frontage with a gap retained to allow for an adoptable access estate road to reach land at the rear.

We have noted that the former commercial yard of the Candidate Site is included within the draft settlement limits, however the adjoining, northern 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 Tycroes, as contained within the Second Deposit Draft. We note that the submission successfully passed through Stage 1 (site compatible against the location of

future growth presented in the Preferred Strategy) and Stage 2A (Initial Detailed Site Assessment) of the Council's site assessment.

However, it was rejected at Stage 2B (further detailed site assessment), with reasons for non-inclusion reported as follows:

"Inclusion of the site would result in an illogical extension of the settlement. However, part of the site will be included within the development limits to allow for a smaller development opportunity along the site's frontage."

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 land should be appropriately allocated for housing under Policy HOM1 "Housing Allocations."**

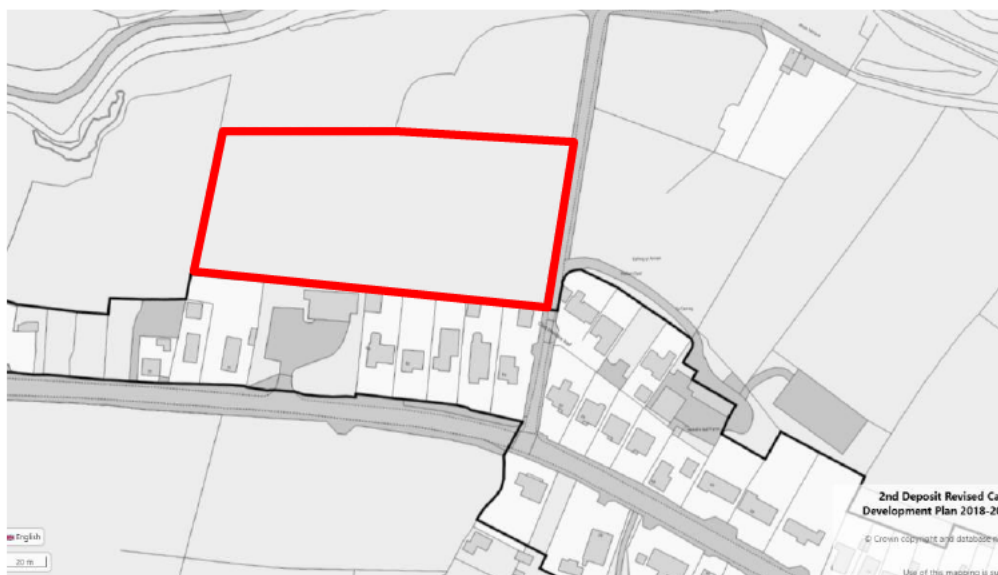


Figure 1 – Extract from Second Draft Proposals Map with site edged in red

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

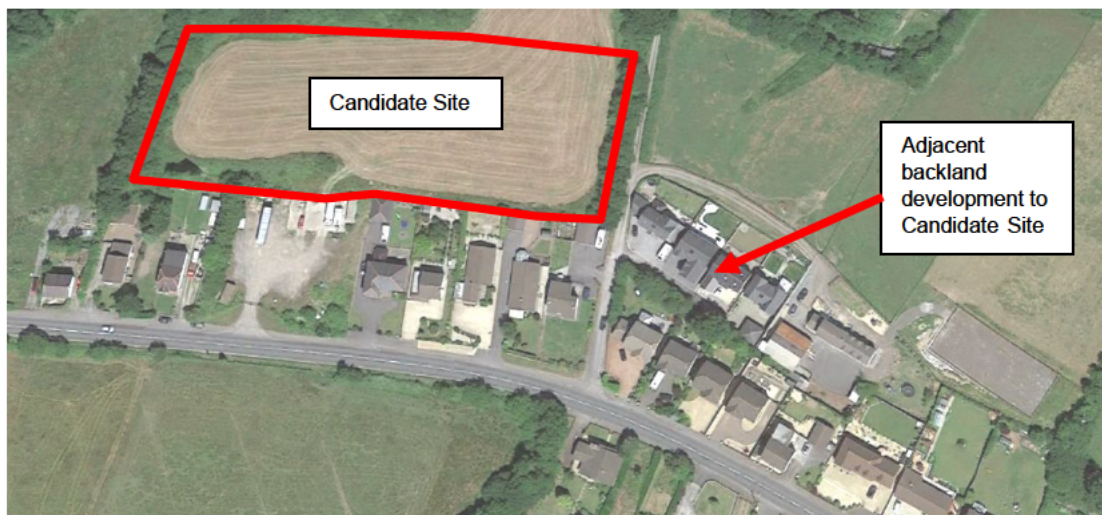
- Completed Deposit LDP Representation Form
- Completed Sustainability Appraisal form

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

1.0 Perception of Illogical Extension to Settlement Limits

- 1.1 The Council consider that the inclusion of the site within defined settlement limits as a Residential Allocation would be an *"illogical extension to the settlement limits."* However, no detailed justification is made for that statement.
- In response, our clients would point to various backland-type developments that have evolved over the last 20 years in Tycroes, Capel Hendre and Saron, where modern, cul-de-sac forms of housing have been granted planning permission and completed on former greenfield sites to the rear of traditional, frontage housing.

Three nearby examples are provided below as Figures 2, 3, 4 and 5 being extracts from Google Earth and the Second LDP Draft, and which graphically depict modern housing in a backland setting either built or proposed under this same LDP, namely at Hendre Road, Heol-y-Parc in Cefneithin, Waterloo Road in Penygroes and Parc-y-Mynydd in nearby Saron Road respectively.



**Figure 2 – Extract from Google Earth illustrating backland housing
at Hendre Road**



Figure 3 - Extract from Second Deposit Draft with backland development at Parc-y-Mynydd, Saron

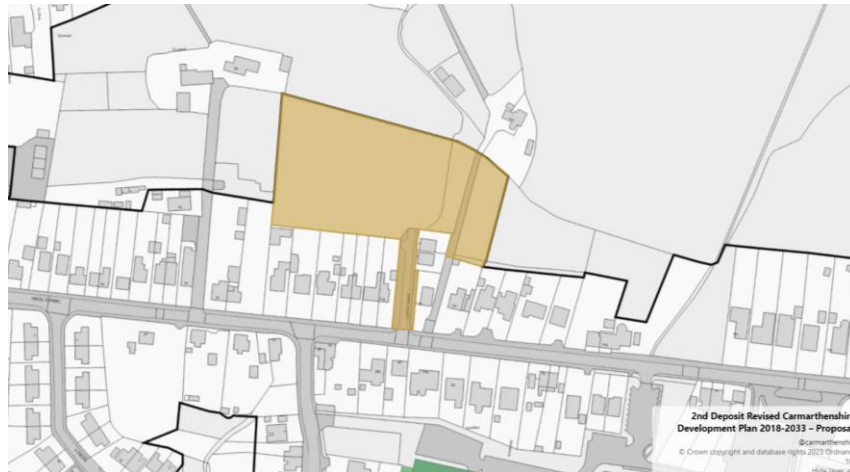


Figure 4 - Extract from Second Deposit Draft proposing backland development at Heol-Y-Parc, Cefneithin

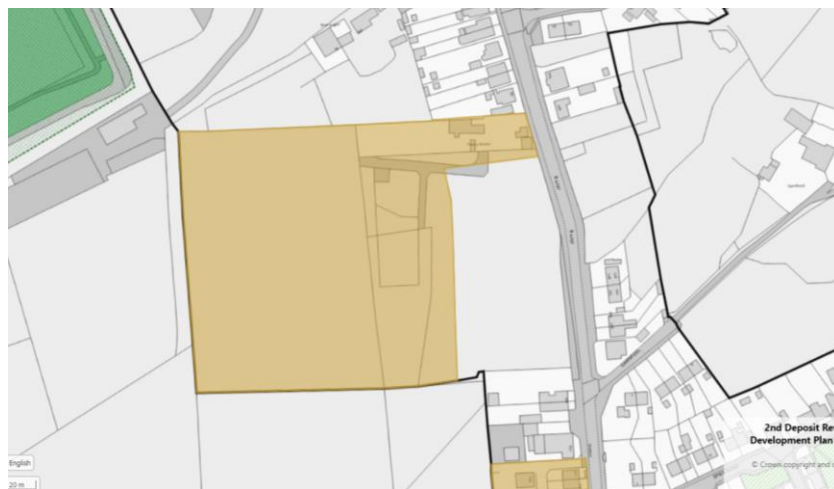


Figure 5 - Extract from Second Deposit Draft illustrating proposed backland development at Waterloo Road, Penygroes

- 1.2 We therefore consider that the Council has adopted a **rather inconsistent approach in the spatial pattern of allocating and subsequently granting planning permission of residential development within the settlement between Ammanford and Cross Hands**. Use has continually be made of developing sites with an initial phase of development across a short frontage to a principal road, such as that propose at Hendre Road. The welcome re-development of a brownfield opportunity would logically lead to further phases to the rear, within a field which remains enveloped by mature woodland. Furthermore, only a single access, in the form of an estate road carriageway could be developed, as in the case of the aforementioned Parc-y-Mynydd example, 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 and Saron Primary Schools, convenience shops at Tycroes Square and main bus route that includes Hendre Road.
- 1.3 The Representation Site indicative site layout plan is reproduced below as Figure 6. It illustrates for only three detached dwellinghouses set fronting the northern flank of Hendre Road, and thus also complementary in form to adjacent established forms of residential development along this highway. A modest cul-de-sac development could be formed to the rear field.



Figure 6 – Indicative site layout plan of proposed Representation Site

2.0 Overall Housing Supply at Ammanford / Cross Hands with Deposit Draft

2.1 The proposals under this Representation merely seek the addition of circa 13 residential units to the overall housing supply of Ammanford / Cross Hands. Tycroes forms part of the principal service centre centring upon the Ammanford / Cross Hands Cluster as defined within the draft LDP.

The Ammanford / Cross Hands Cluster aims to provide an additional **1257** residential units over the Plan period to 2033, and thus the addition of an allocated site of 13 units will not lead to an over-supply of dwellinghouses within the Cluster.

2.2 We have 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 7 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 7 – Both allocations in Tycroes are now fully completed before the Replacement LDP is even adopted

2.3 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, Penybanc - 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.

2.4 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?

2.5 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, of up to 13 units such as that proposed at Hendre Road.

2.6 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.

2.7 In the case of Hendre Road, there are little signs within the immediate locality of properties for 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 Tycroes. Consequently, it is a location where housing proposals are **deliverable, assisting to meet housing needs** in this part of Ammanford / Cross Hands.

In conclusion, this Representation to the 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 13-15 dwellinghouses as a second phase to the former commercial yard re-development will not appear at odds to the prevailing spatial pattern of development in Tycroes and Saron. 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 Hendre Road 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, 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