

Our Ref.: 1080a/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 D. Sims & Mr P. Cromwell
Land adjacent to Memorial Hall, Pontargothi**

We are instructed by Mr. D. Sims & Mr P. Cromwell 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/135/003**, seeking inclusion of their land for future residential development within the defined settlement limits of Pontargothi within the Replacement Local Development Plan.

The Candidate Site comprises a rectangular-shaped former grazing field set fronting the A40 trunk road, and immediately adjoining the Memorial Hall in Pontargothi. The site is generally undulated, with a slight fall in gradient away from the road frontage, which is marked with a well-maintained linear hedgerow, growing off the back edge of a continuous pavement along this straight section of highway.

The field descends to a well-defined southern hedgerow boundary which separates from further agricultural land running to the River Towy. It is proposed to develop the grazing field for a low-density residential development, potentially of single-storey units / bungalows set over a uniform cul-de-sac type layout.

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 Pontargothi, 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), and Stage 2A (Initial Detailed Site Assessment). However, did not progress past Stage 2b (Further Detailed Site Assessment) with reasons for non-inclusion reported as follows:

“Development would lead to an illogical extension of the urban form. There is sufficient residential land allocated in the settlement. The Site will remain outside of limits.”

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 draft settlement limits for Pontargothi, 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 Pontargothi, as reproduced below in Figure 1. The land should be appropriately allocated for housing under Policy HOM1 “Housing Allocations.”**

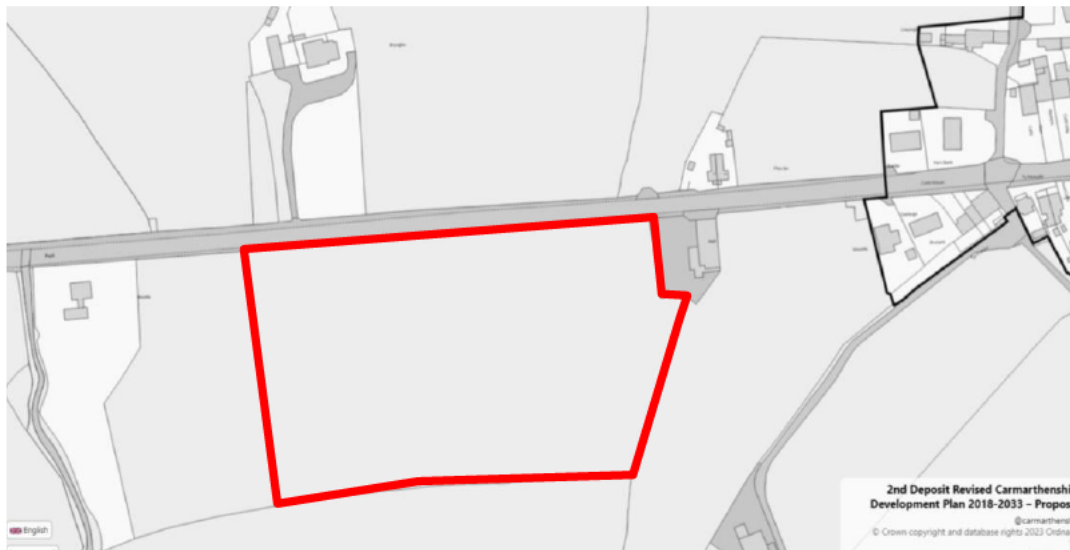


Figure 1 – Extract from Pontargothi Proposals Map with site edged in red

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

- Completed Second Deposit LDP Representation Form
- Completed Sustainability Appraisal form

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

1.0 Response to Setting of Site within Village Form

- 1.1 The Council consider that the site will be an "*illogical extension to the urban form*" of the settlement. Firstly, we must correct Officers that Pontargothi is a rural village which has no "urban form." The Candidate Site has a frontage with the A40 road and lies immediately adjoining the Memorial Hall and its surfaced car park. The site is linked to the village by virtue of its close proximity on foot via the established pavement along the entire southern flank of the road.
- 1.2 The site takes a form which can utilise the existing agricultural field access which can be improved through widening and adapted with dedicated junction radii. Visibility standards for emerging vehicles are very good given the presence of a wide pavement along this straight section of highway, which forms part of a 40-mph speed limit, indicative of the built-up nature of the settlement at this point.
- 1.3 The westward extension of settlement through the development of the Candidate Site would be no different in form from Allocated Site SuV17/h1, located some half a kilometre metres south-west of the Candidate Site at Nantgaredig. That site extends to some 4 acres of level grazing field for several hundred metres back from a road frontage with Station Road. The Candidate Site adopts a similar roadside form, ensuring that the perimeters of the site are contained with defensible field boundaries, marked by linear hedgerows and tree-lined field boundaries.
- 1.4 Therefore, we consider that the Council has adopted this rather inconsistent approach on the basis that it only considers that Pontargothi and neighbouring Nantgaredig should grow by very minor proportions over the Plan Period to 2033. However, the village of Pontargothi is significant in scale, containing over 150 dwellinghouses, two public houses and Memorial Hall. It also possesses good public bus service connections to Carmarthen and Llandeilo. In other words, **it is sustainable as a place to live and work.**
- 1.5 The Representation Site indicative site layout plan is reproduced below as Figure 2. It illustrates for cul-de-sac form of development with a total of 30 detached and semi-detached bungalows set fronting an internal estate road, which can access the site a principal new junction off the A40. Thus the proposed form of layout and development is complementary in form to adjacent established form of residential layouts seen at the northern flank of neighbouring Nantgaredig between the Primary School and A40 junction.



Figure 2 – Indicative site layout plan of proposed Representation Site

2.0 Overall Housing Supply at Pontargothi, Nantgaredig and Carmarthen Cluster with Second Deposit Draft

- 2.1 The proposals under this Representation merely seek the addition of a further 30 residential units to the overall housing supply of Pontargothi within the draft Plan. **Pontargothi is defined as sustainable settlement (SuV18)**, 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 to 2033, and with Pontargothi contributing only one site, being SuV18/h1 allocated for a total of 15 units. We submit that an allocation of 30 units will not lead to an over-supply of dwellinghouses within the Cluster.
- 2.3 Pontargothi is quite unique in terms of its positioning and setting being part of the Carmarthen Cluster. It is placed at the eastern extremity of the defined area, bordering the Llandeilo / Llandovery (Towy Valley) Cluster. Nantgaredig and Pontargothi serve a rural hinterland and are the **principal settlements within the central Towy Estuary between Carmarthen and Llandeilo**. Policy HOM1 provides details of the allocations in the Towy Valley east of Carmarthen and within Cluster 1, as shown below.

Llanarthne		
SuV15/h1	Llanarthne School	8
Capel Dewi		
SuV16/h1	Llwynddewi Road	8
Nantgaredig		
SuV17/h1	Rear of former joinery, Station Road	35
Pontargothi		
SuV18/h1	Land off A40, Pontargothi	15

Figure 3 – Policy HOM1 Residential Allocations in Towy Valley and Cluster 1

- 2.4 We note that the Llanarthne School redevelopment site **has already been completed** (SuV15/h1), whilst the Capel Site **is half completed** (SuV16/h1).
- 2.5 Only one site is allocated in neighbouring Nantgaredig, and that relates to 35 residential units at **Station Road (SuV17/h1)**. It has been the subject of any planning application to develop residential properties, but, however, the determination of that application has been hampered by the continuing embargo placed upon sites which will eventually drain foul water to sewerage treatment plants entering the River Towy. Elevated levels of phosphate in that river are such to be materially affecting its designation as a Special Area of Conservation, and it is alleged that treated foul water flows from public sewerage utilities may be one contributing factor to those excessive phosphate levels in the river.
- 2.6 This is in contrast the next nearest allocation to Nantgaredig, being the allocated site at Pontargothi, referenced “land adjoining Cresselly Arms” – **Site SuV18/h1**. It has the benefit of full planning permission for 15 dwellings, and where work has commenced on an access road.
- 2.7 We have 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.

2.8 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.

2.8 **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.

2.9 **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.

- 2.10 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:

2.11 **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.

2.12 **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.

2.13 **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.

- 2.14 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 Pontargothi**. There is clear evidence in Pontargothi, such as the progress to a detailed scheme at the Cresselly Arms 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.

3.0 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 30 bungalows will not appear at odds to the prevailing spatial pattern of development in Pontargothi. 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 the land adjoining the Memorial Hall 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 Pontargothi 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

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