

Our Ref.: 1542a/RAB

Date: 27<sup>th</sup> 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. I. Griffiths  
Land part of Cae Hir, and off Brynhyfryd, Llangennech**

We are instructed by Mr. I. Griffiths to make a formal representation to the “soundness” of the Second Deposit Draft of the Carmarthenshire Local Development Plan.

Our client made a formal Candidate Site Submission in August 2018, which was referenced **SR/086/003**, seeking inclusion of their land for future residential development within the defined settlement limits of Llangennech within the Replacement Local Development Plan. The Candidate Site comprises a generally undulated tract of former grazing land set north of our client’s dwelling known as Cae Hir, and immediately south of the local-authority-built housing estate of Brynhyfryd, from which it is proposed vehicular access to the Candidate Site will be derived.

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 Llangennech, 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 however did not proceed further with the Council having published reasons for non-inclusion, which are reported as follows:

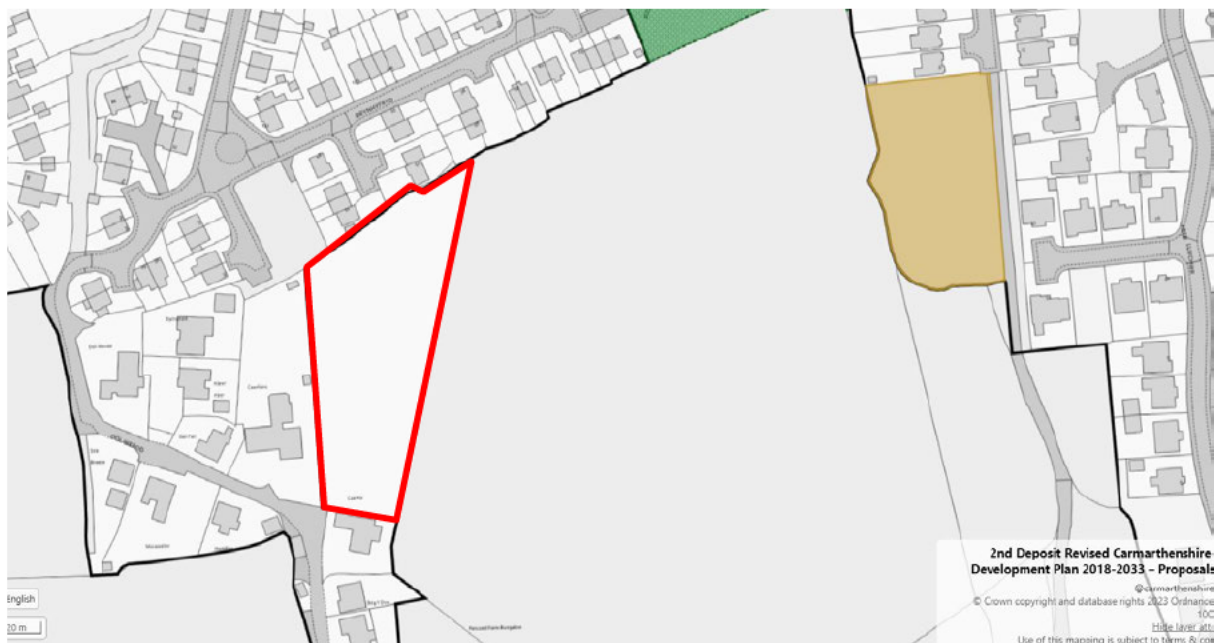
*“There are concerns at the deliverability of the site, most notably from a highway access point of view. The site will remain outside of development limits (with Cae Hir remaining within development limits).”*

*“It*

Our client was unrepresented during the Candidate Site stage, and has since instructed this practice to act on his behalf and challenge the non-inclusion of the Candidate Site in the Second Draft of the LDP.

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 Llangennech, 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 Llangennech 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:

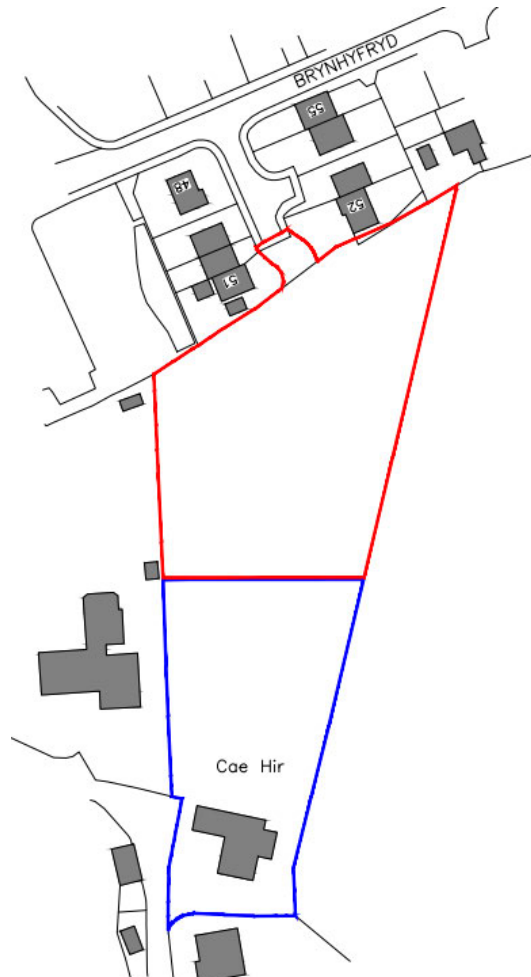
- Completed Deposit LDP Representation Form
- Completed Sustainability Appraisal form

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

#### **1.0 Deliverability of draft Allocation off Brynhyfyd**

1.1 The Council consider that the only reason for the Candidate Site off Brynhyfyd for not being included within the draft Plan as a Residential Allocation is that they believe that the access may not be achievable from that cul-de-sac. It is noted from the Council’s Candidate Site records that the extent of actual Candidate Site may be

depicted not as formally submitted by our client. We therefore enclose a revised location plan with site edged in red for ease of identification. Other land in Mr Griffiths' ownership is edged in blue which includes a buffer area set north of his property at Cae Hir and the Candidate Site proposals.



**Figure 2 – Location Plan of Candidate Site**

- 1.2 We have also prepared a more detailed indicative site layout to illustrate how vehicular and pedestrian access could be achieved off Brynhyfyd to cater for an indicative capacity of 9 dwellings. Figure 3 below illustrates this arrangement with a 5.0 metres wide carriageway extending south off the Brynhyfyd hammerhead and entering the field. The new estate road would be equipped with 1.8 metres wide footways off both flanks and would terminate in an adoptable turning head within a central position in the Candidate Site field.
- 1.3 The proposals under this Representation seek the addition of 9 residential units to the overall housing supply of Llangennech, which forms part of the principal service centre centred upon the Llanelli Cluster as defined within the draft LDP. The road network at Brynhyfyd is perfectly capable of sustaining and catering for the additional volume of traffic associated with only nine new dwellings, with the estate's carriageway constructed of adoptable dimensions to carry two-way traffic with complete pedestrian segregation.



**Figure 3 – Indicative Site Layout plan of Representation Site**

- 1.4 The indicative site layout indicates that a mix of two-storey detached and semi-detached dwellings could be brought forward, each equipped with side driveways for off-road parking, together with traditional rear garden space to complement the general theme of established housing in this part of Llangennech.

## **2.0 Overall Housing Supply at Llangennech within Deposit Draft**

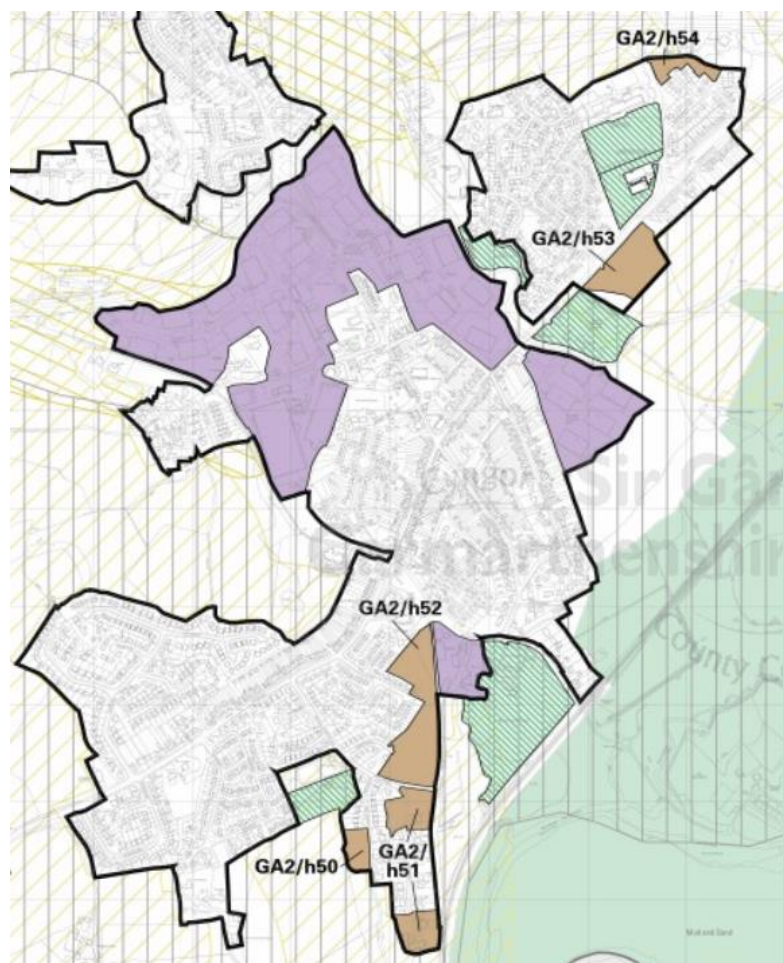
- 2.1 We have therefore examined and researched sites which have been brought forward as Residential Allocations with the Deposit Draft. The Llanelli Cluster aims to provide an additional 3039 residential units over the Plan period to 2033, with Llangennech (Settlement SeC7) providing sites totalling 94 units to that overall Cluster total.
- 2.2 In Llangennech, great emphasis within the Draft Plan has been placed upon the continued allocation of proposed housing sites still left allocated from the 2014-21 Local Development Plan. Figure 4 below provides an extract from the Second Deposit Draft Schedule of Housing Sites from Policy HOM1.



Llangennech				
SeC7/h1	Box Farm	7	1.4	Year 6 - 10
SeC7/h3	Golwg Yr Afon	50	25	Year 6 - 10
SeC7/h4	Opposite Parc Morlais	32	3.84	Year 6 - 10
SeC7/h5	*Maesydderwen	5	5	Year 6 - 10

**Figure 4 – Second Deposit Draft Housing Schedule**

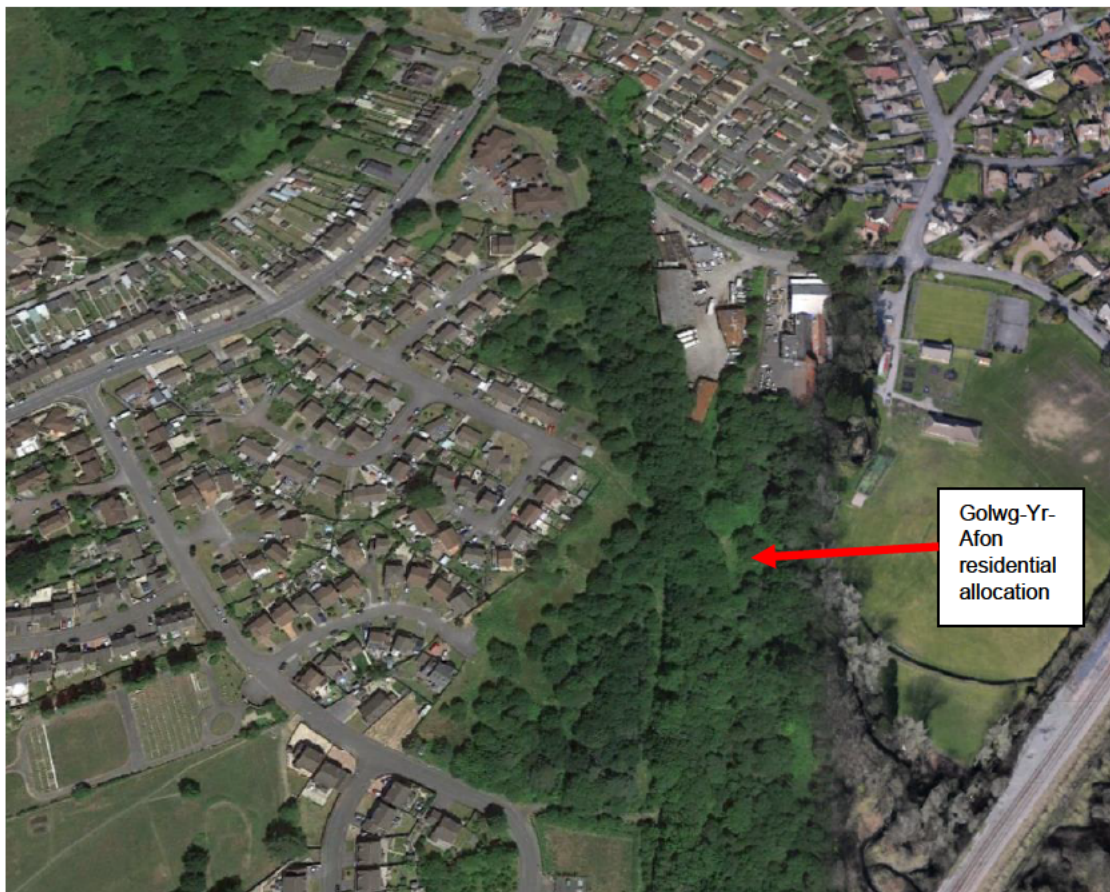
Sites SeC7/h1 Box Farm, h3 at Golwg yr Afon and h5 at Maesydderwen have remained within the Plan but it is noted that all three suffer from a complete lack of any developer interest and planning permission. Figure 5 provides a reproduction of the 2014-adopted LDP Proposals Map, where all three allocated sites are graphically illustrated. Maesydderwen is allocated as GA2/h54, Box Farm as GA2/h50 and Golwg-Yr-Afon as GA2/h52.



**Figure 5 – Adopted LDP Proposals Map for Plan Period 2006-21**

2.3 In relation to “**Golwg-Yr-Afon**” (SeC7/h3) has not altered since the 2014 adopted LDP and remains undeveloped but allocated. No planning permission has ever been sought for residential development on the site. The site was included in the Llanelli Borough Local Plan (1996), Carmarthenshire Unitary Development Plan (2003) and, as mentioned above, within the Local Development Plan (2014).

Consequently, twenty-five years of Development Plan allocations have elapsed without any signs of wholesale delivery of this site. Clearly, there is no historic demand for a site of this scale in this part of the Llangennech area. It is almost certainly a physically challenging site, covered in mature and dense vegetation, with mature trees along its entire eastern perimeter covered and protected by a large Tree Preservation Order. The Google Earth image at Figure 5 below covers the vegetated spread over the site. The site is undoubtedly rich in ecological habitats which may further hinder its delivery. Yet despite these obvious deficiencies, the Council is prepared to allocate the site once again in a new Development Plan?



**Figure 5 – Google Earth image (June 2021) of Golwg-Yr-Afon site and extent of tree cover**

The decision to retain Golwg-Yr-Afon after a period of 25 years within the LDP is shown to be even more 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**. The Development Plans Manual (Edition 3) is quite clear with regard to rolling forward allocations and states that allocations “ ... *rolled forward from a previous plan will require careful justification for inclusion in a revised*

*plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered.”.* no evidence has been presented to demonstrate a change in circumstances to indicate the allocation will now be delivered.

- 2.4 We submit that the draft allocation be omitted from the Plan, and that housing allocation be redistributed to Alternative Sites, such as that proposed off Brynhyfryd. There is clear evidence in Llangennech, Hendy, Fforest and Llanedi that such moderately-sized sites are far more likely to be brought forward and developed in full by regional 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.
- 2.5 In the case of Brynhyfryd and adjoining Pencoed, 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 Llangennech. Consequently, it is a location where housing proposals are **deliverable, assisting to meet housing needs** in this part of the Llanelli Cluster.

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 circa 9 dwellinghouses will not appear at odds to the prevailing spatial pattern of development in Llangennech. 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 off Brynhyfryd 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 Llangennech realigned to include the 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