



**REPRESENTATION SUPPORTING STATEMENT**  
**FOR**  
**REPLACEMENT CARMARTHENSHIRE LOCAL**  
**DEVELOPMENT PLAN 2018-2033**

**LAND ADJACENT TO PEN-Y-BRYN,**  
**OFF THORNHILL ROAD, CWMGWILI,**  
**CARMARTHENSHIRE**

On behalf of Mr. A. Williams

**Our Ref:** 2030.a  
**Date:** March 2023  
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## 1.0 INTRODUCTION

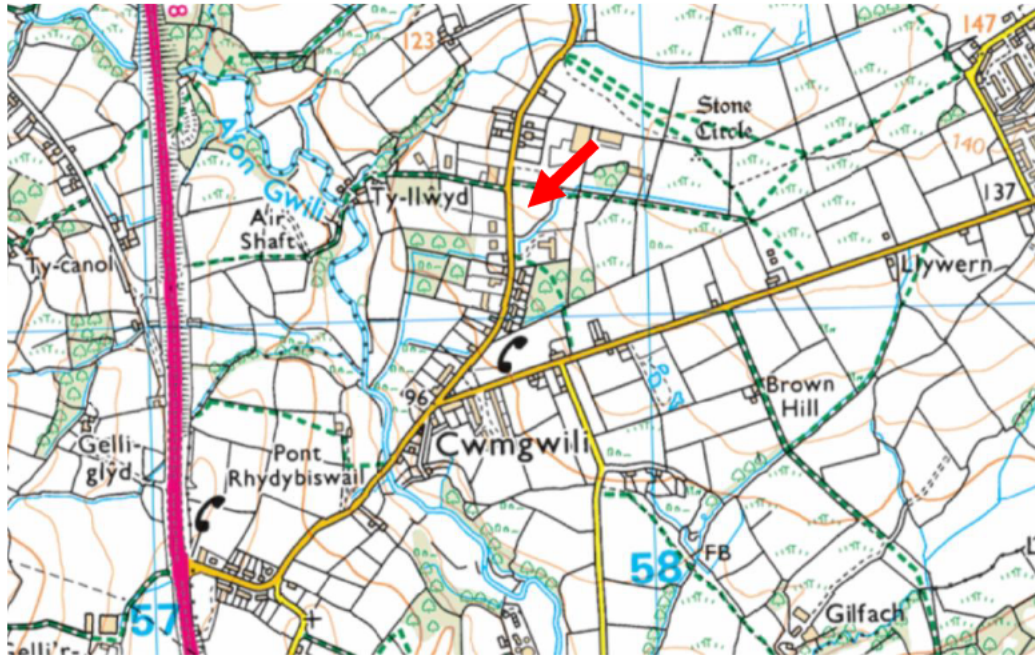
- 1.1 Mr. A. Williams (the Land Owner) have instructed Evans Banks Planning Limited to prepare and submit a formal Representation for the inclusion within defined settlement limits of land adjacent to Pen-y-Bryn, off Thornhill Road, Cwmgwili, Carmarthenshire for the purposes of residential development in the forthcoming Replacement Carmarthenshire Local Development Plan.
- 1.2 This Statement has been prepared in line with the Authority's published documents entitled *Revised Carmarthenshire Local Development Plan: Guidance Note* and *Revised Carmarthenshire Local Development Plan: Candidate Site Assessment Methodology*. The contents of this Statement therefore address the set criteria, determining the issues and each qualifying point raised within these documents. Consideration has also been given to ensuring that this formal submission complies with the guidance and requirements of *Planning Policy Wales (Edition 11)*, in relation to the preparation of development plans and the allocation of land for residential purposes as part of that preparation process.
- 1.3 The contents of this Statement therefore provide a comprehensive case for the inclusion of the land for residential development purposes within the defined settlement limits of Cwmgwili, and it should also be read in conjunction with the accompanying supporting information and indicative site layout plan.
- 1.4 This site did form part of a larger Candidate Site formally presented to the Council in August 2018, and referenced **SR/040/003**. Consideration has subsequently been given by our client as to the extent of site sought under the LDP process, following the conclusions of the Council in their Site Assessment Table (January 2023). The Council consider that "*The site is located immediately adjacent to a site designated for importance to nature conservation.*" This Statement seeks to examine that conclusion and provides an Amended Site proposals which seeks to address and ultimately overcome this biodiversity issue.

## 2.0 SITE CONTEXT

### 2.1 THE SITE

- 2.1.1 The Amended Site relates to a parcel of undeveloped agricultural pasture which is set off the eastern flank of Thornhill Road, being a C class road near the centre of the village of Cwmgwili. The field parcel is irregular in shape and extends to a gross area of 1.65 acres (0.66 hectares). The northern perimeter of the field borders part of the Heathfield Industrial Estate, although the southern part of that estate is undeveloped, being covered in grass and scrub, with the main activity being associated about an undulating yard and shed outbuildings to the centre and eastern part of that large land enclosure.
- 2.1.2 The northern perimeter of the Candidate Site is separated from the above estate by a linear row of mature trees and a public footpath – FP51/5, which runs in a east to west alignment parallel with the northern perimeter and marked with a metal kissing gate as it emerges onto Thornhill Road, re-commencing off the opposite flank of that highway. The path runs east from the subject site in to an area designated as a Site of Special Scientific Interest (SSSI), known as “Caeau Lotwen”.
- 2.1.3 To the south, lies the nursing home known as Pen-y-Bryn, which is set within its own spacious grounds, which are well tree-line and which offer a natural screen and buffer to the Candidate Site. Those trees form the entire eastern perimeter of the site with the eastern part of becoming more denser as the site borders the SSSI.
- 2.1.4 Individual residential properties lie directly opposite, all fronting the western flank of Thornhill Road, and set within modest plots, which are set back from the roadside frontage. The site’s frontage is linear set off the back edge of a continuous pavement, and comprises thinner, younger tree specimens and band of scrub.
- 2.1.5 The parcel of land is identified in red by Plan A, which illustrates its wider position within the settlement of Cwmgwili and shows the existing consolidated form of

modest industrial estate and frontage development to Thornhill Road. Plan B provides a detailed Ordnance Survey map extract with the site perimeters identified.



**Plan A – wider setting of Cwmgwili with site highlighted**



**Plan B – detailed OS Plan of Alternative Site**



2.1.6 Photographs of the Alternative Site are reproduced below, showing its current March 2023 condition and form. The Alternative Site is relatively level and is well grazed to the extent that no overgrowth vegetation is visible. All rear and side mature perimeter trees appear in good health which warrant retention.



**Photo 1 – view of level field from Thornhill Road**



**Photo 2 – view of gated access and footpath entrance**



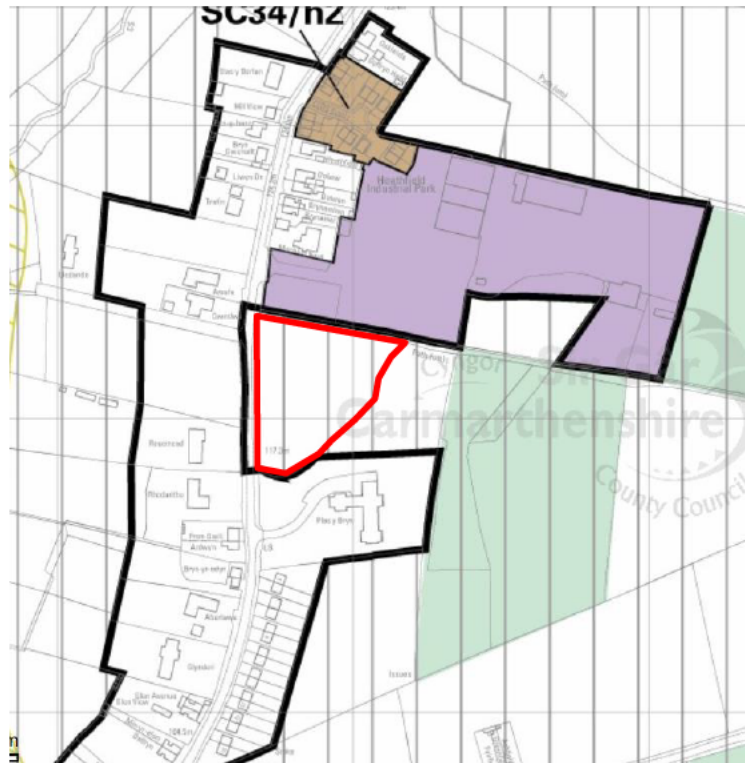
**Photo 3 – view to centre of field and thinner, sparse vegetation to road frontage**

2.1.7 The open enclosure can be categorised in two portions, being the open expanse of pasture visible from the highway, and an eastern third, segregated from the front field by a drainage ditch. Within this eastern third, the land is more succumbed to nature, overgrown and dense in vegetation as it borders the Caeau Lotwen SSSI to the east.

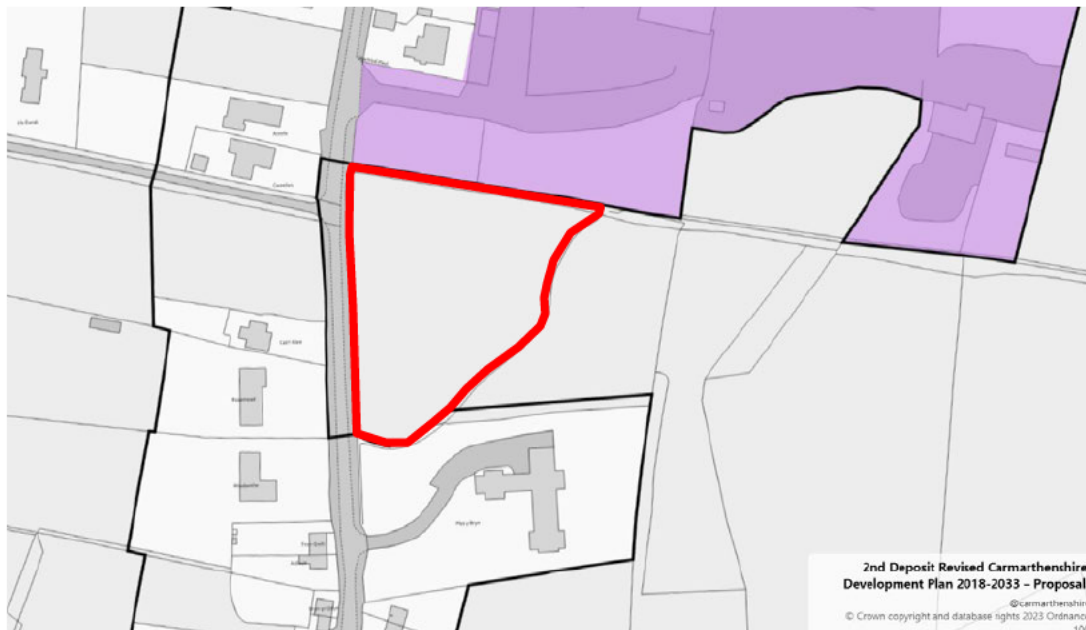
## **2.2 SETTLEMENT SUSTAINABILITY AND SITE SETTING WITHIN THE CURRENT ADOPTED LOCAL DEVELOPMENT PLAN & SECOND DEPOSIT DRAFT (FEBRUARY 2023)**

2.2.1 Under the provisions of the current adopted Carmarthenshire Local Development Plan, the proposed land adjoins the Settlement Limit of Cwmgwili. The site is shown edged in red at Plan C below. The draft Proposals Map within the Second Deposit Draft repeats the same settlement limits, as shown in Plan D:





**Plan C – 2014-adopted Proposals Map with Alternative Site edged in red**



**Plan D – Second Deposit Draft of Cwmgwili**

2.2.2 The Alternative Site adjoins and is well related to the draft defined Development Limits of Cwmgwili. At present the development limits are drawn tightly about the existing settlement form at Thornhill Road. The Alternative Site seeks to form an infill development set between the Heathfield Industrial Estate and Pen-y-Bryn Nursing Home, closing the only modest, undeveloped field frontage along the eastern side of that highway.

2.2.3 Cwmgwili has good accessibility to the nearby settlements of Cross Hands and Ammanford, and the A48 Trunk Road, which junctions at Cwmgwili some one kilometre to the south-west.

2.2.4 In terms of the Thornhill Road Site, it is located within easy driving and walking distance of all community facilities and local services present provided within the Cross Hands settlement.

2.2.5 **Transition from Adopted Local Development Plan (2006-21) – Allocation Status**

In terms of planned growth, the proposed Alternative Site is located within the identified **SC34 Sustainable Community** within the current LDP, adopted in December 2014. Cwmgwili is regarded by the Council as sustainable settlement

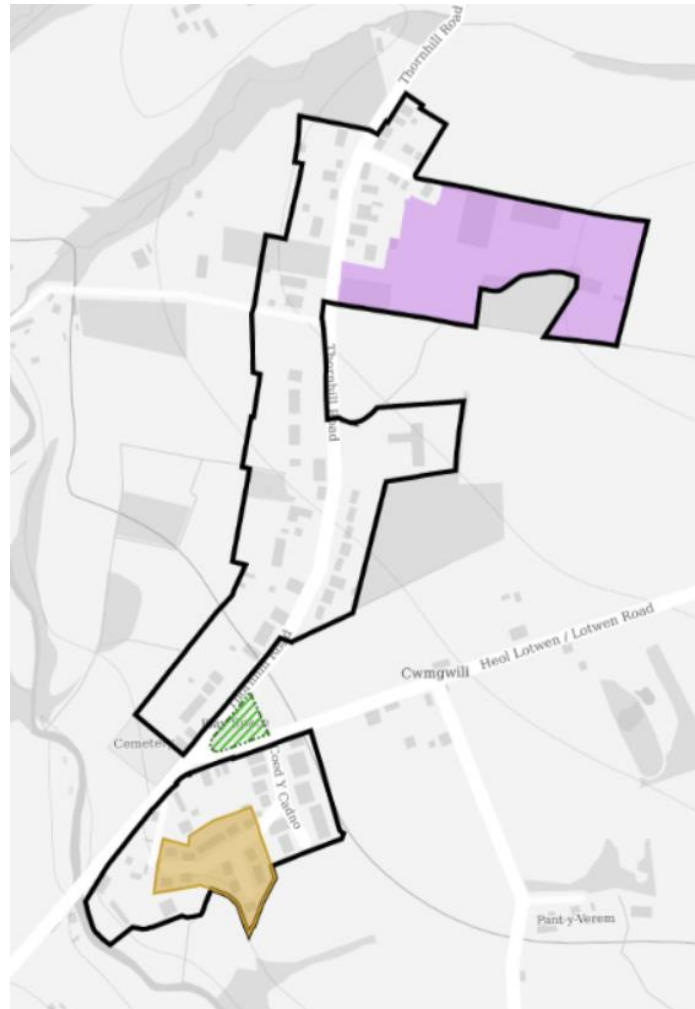
2.2.6 Two housing allocations were presented within the LDP as shown in Plan E below, which provides an extract from the 2014 Proposals Map for Cwmgwili. Both allocations at Coed-y-Cadno (SC34/h1) and land at the frontage of the Heathfield Industrial Estate (SC34/h2) have long since been completed.

The Second Draft of the Replacement LDP continues to allocate land at Coed-y-Cadno but this was completed several years ago. Plan F illustrates the remarkable contrast where no new residential allocations are brought forward, or new sites introduced, which equates to only infill opportunities being available in the new settlement limits.





**Plan E – adopted 2014 LDP Extract for Cwmgwili illustrating two residential allocations**



**Plan F – Second Draft Plan for Cwmgwili with no new residential allocations**

**2.2.7 Second Deposit Draft LDP (February 2023) – Housing Land Availability**

The Council published a Deposit Draft in February 2023, which is now subject of public consultation. Within the Second Deposit Draft, Cwmgwili sits within the Cross Hands / Ammanford Cluster. The Cluster aims to provide an additional **1257** residential units over the Plan period to 2033, and thus the addition of an allocated site of 20 units at Cwmgwili will not lead to an over-supply of dwellinghouses within the Cluster, nor indeed the settlement itself.

2.2.8 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.

2.2.9 **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?

2.2.10 **Site PrC3/h14 - Nantydderwen - for 33 Units.**

The Land was allocated Carmarthenshire Unitary Development Plan (2006). No progress was made in bringing the site forward, and yet it was allocated within the Local Development Plan in 2014. Consequently, **twenty 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 Drefach area. More physically challenging sites, such as Cae Coch, Cae Pound at Cross Hands and Heol-y-Parc at Cefneithin have come forward despite topographic issues and previous ground contamination, and yet still the Council is prepared to allocate the site once again in a new Development Plan. The land is relatively level with immediate access onto the local highway network.

The decision to retain Nantydderwen after a period of 20 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.

- 2.2.11 We submit that the draft allocations at Tirychen, Nantydderwen and Pantyblodau be omitted from the Plan, and that housing allocations be redistributed to modest Candidate Sites, of up to 20 units such as that proposed at Thornhill Road.

There is clear evidence in Tycroes, Capel Hendre and Cwmgwili 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 the case of Thornhill 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 Cwmgwili. Consequently, it is a location where housing proposals are **deliverable, assisting to meet housing needs** in this part of Ammanford / Cross Hands.



### 3.0 THE PROPOSAL

3.0.1 This Statement is accompanied by an indicative layout for a potential residential scheme that could be development on the site. It should be emphasised that the accompanying layout is for illustrative purposes only, and that other design solutions for the site could be reached. Notwithstanding this, the accompanying layout drawing has taken into account all potential assets and constraints of the site and demonstrates that it can deliver **22 units** in a deliverable and sustainable manner.

### 3.1 DEVELOPMENT OVERVIEW

3.1.1 It is proposed that the Alternative Site be allocated in the forthcoming replacement LDP for the purposes of a combined total of 22 residential units. The accompanying illustrative layout demonstrates that the site can accommodate this number in a deliverable and sustainable manner. Plan G illustrates the indicative site layout for the Alternative Site, as edged in red, extending off the Thornhill Road highway.



Plan G – Site Layout

- 3.1.2 As illustrated above, the site is capable of accommodating detached and semi-detached houses to replicate and being reflective to the existing form of the development to the west along Thornhill Road, particularly those properties constructed off the frontage of Heathfield Industrial Estate, known as Clos Gwili.
- 3.1.3 With regards to access, it is proposed that the Alternative Site would be served by a new 6.0 metres wide radii junction, set centrally in the site frontage. The existing Public Right of Way would be fully retained off the northern perimeter, with kissing gate access remaining unaffected. Vehicle speeds are consistent with the 30mph speed limit, and thus visibility splays of 2.4m x 43m can easily be achieved where the accesses adjoin the Thornhill Road.
- 3.1.4 The Alternative Site proposals can fully retain all existing boundary treatments being established tree perimeter and hedgerows about the Pen-y-Bryn Nursing Home.

## **3.2 Significant Amendment to Candidate Site Submission of August 2018**

- 3.2.1 The amended Site Proposals put forward under this Representation crucially differ from the Candidate Site submission made in August 2018, where the eastern third of the ownership is omitted from the proposals. The Council's formal response to that Candidate Site submission, as reproduced in the Site Assessment Table – January 2023 – states that "*The site is located immediately adjacent to a site designated for importance to nature conservation.*" The Council are referring to the Caeau Lotwen SSSI, the perimeters of which are reproduced in Plan H below, being an extract from the Council's Constraints Map.



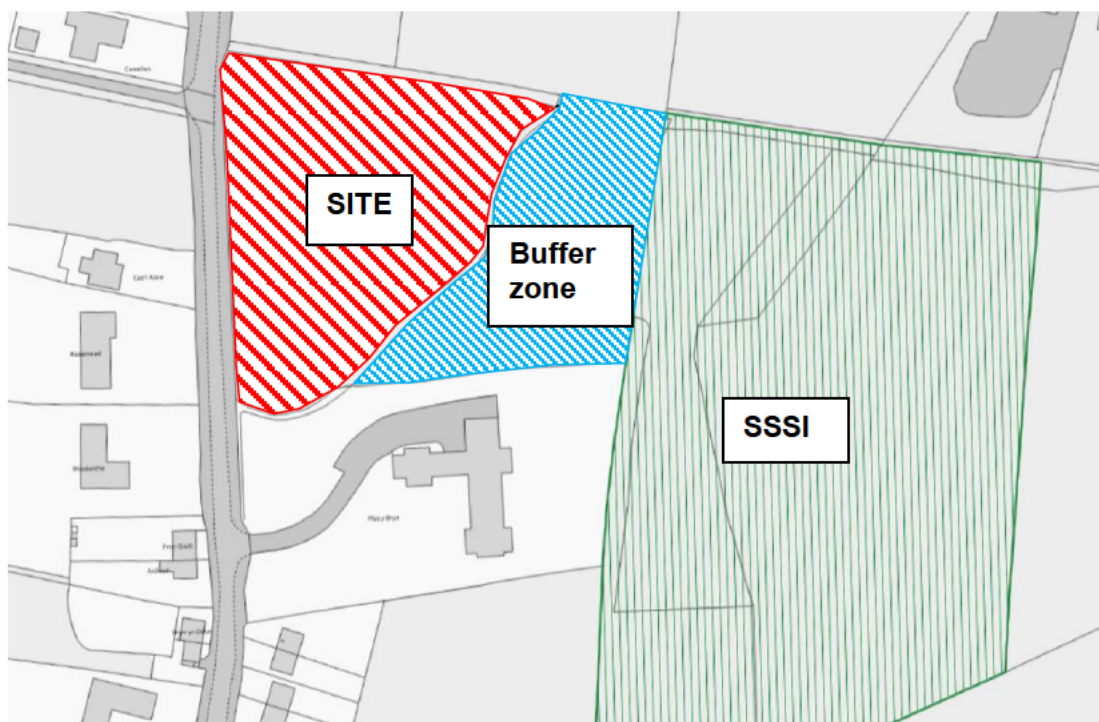
**Plan H – Extent of Caeau Lotwen SSSI**

3.2.2 The 2018 Candidate Site proposals are reproduced below at Plan I and are shown to extend eastwards from the road frontage to share a perimeter with the SSSI. An ecological buffer strip was shown to the eastern perimeter to segregate new development from that nature conservation designation.



**Plan I – 2018 Candidate Site Proposals**

3.2.3 In contrast, the new proposals have been scaled back to allow the eastern third of the former Candidate site to remain undeveloped, and thus dramatically increasing the extent of open and retained buffer zone to the SSSI as shown in Plan J below. That buffer zone extends for a depth averaging 50 metres across the northern perimeter and up to 85 metres across the southern perimeter.



**Plan J – greater extent of Buffer Zone between Site and SSSI**

3.2.4 It is therefore firmly contended that the revised Alternative Site Proposals will overcome the Council's objections to the original Candidate Site submission, in providing a significantly larger ecological buffer zone between SSSI and proposed development site.



## 4.0 CONCLUSION

- 4.1 The Alternative Site is modest in overall size, with established development located off either side flanks at Thornhill Road. The enclosure tends to be well screened from public view by virtue of high perimeter trees which shelter the site and add a sense of semi-rural character to the scheme.
- 4.2 The Site lies within close proximity and walking distance to the existing community and local services of Cwmgwili and Cross Hands which will ensure it makes a positive contribution to both national and local sustainable development objectives.
- 4.3 The Alternative Site has been **significantly amended** from that put forward as a Candidate Site in 2018, in response to the Council's Site Assessment Table. A much greater and wider ecological buffer zone has been created so that all the overgrown extending east from a drainage ditch to the common perimeter with the **Caeau Lotwen SSSI is preserved as an ecological buffer zone, safeguarding the integrity and nature conservation asset that is that SSSI.**
- 4.4 In view of the above and the information provided within this Statement, it is respectfully requested that the Alternative Site in question be included within limits for a modest residential development.