

Our Ref.: 1099a/RAB

Date: 28<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 A. Green  
Land rear of Trysor, Peniel, Carmarthen**

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

Our client owns a small level paddock which immediately set to the rear of established residential properties in Peniel. They are seeking inclusion of their land for future residential development within the defined settlement limits of Peniel within the Replacement Local Development Plan.

The Site is irregular in shape but shares a common boundary on two sides with detached dwellinghouses which front an unclassified road on the eastern side of the village, close to the Primary School. The land benefits from an undeveloped gap set between existing houses which can allow for a shared access driveway road to be formed and continued into the centre of the paddock.

We have noted that **Peniel** is categorised within the draft settlement limits as a Tier 3 Rural Village and referenced SuV10. Two residential allocations have been drafted in the Plan, namely “**South of Pentre**” – **Site SuV10/h1**, capable of providing 10 units, and “**Aberdeuddwr**” – **Site SuV10/h2**, with a capacity for 38 units.

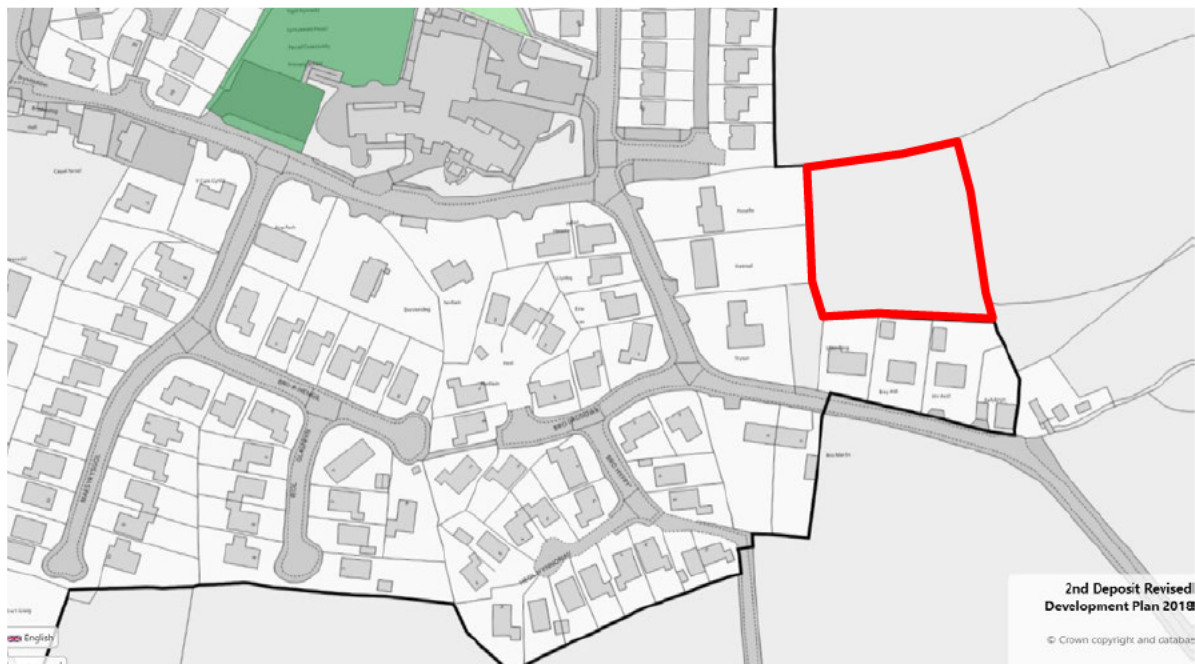
Land south of Pentre has been under construction for three last two years, with many units completed and occupied.

It is noted that apart from the undeveloped field enclosure at Aberddeudwr, there are no opportunities in Peniel for small scale “rounding-off” developments, which could provide for

local, self-build plots, whilst not adversely affecting housing land supply in the settlement or wider Cluster. This formal Representation relates solely to the non-inclusion of this land within the draft settlement 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 draft settlement limits for Peniel, 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 Peniel, as reproduced below in Figure 1.**



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

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

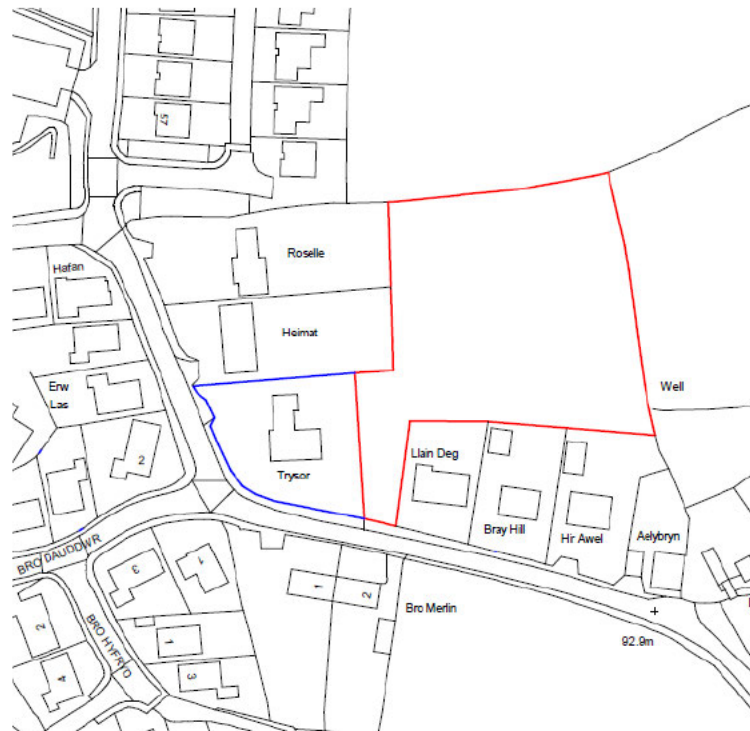
- Completed Deposit LDP Representation Form
- Location and Indicative Site Layout plans

## **Response to Council’s Setting of Peniel Draft Settlement Limits**

### **1.0 Integration of Site with Character and Setting of Locality**

- 1.1 The Representation Site consists of a generally rectangular-shaped paddock which is well-defined in that its western and southern perimeters form the common rear boundaries of established residential properties. Those properties benefit from uniform rear garden space, and a parallel line of boundary with the site, comprising mainly of high perimeter fencing. The northern and eastern perimeters consist of uniform lines of mature trees and hedgerow respectively. The boundaries form a strong, defensible boundary to surrounding agricultural pasture, which takes on a far more open and undefined form than the modest and compact Representation Site.

Figure 2 below illustrates the boundaries of the site in red, whilst Figure 3 provides a Google Earth reproduction of the aerial view of the site where the above features are graphically evident.



**Figure 2 – Location plan of site with boundaries edged in red**



**Figure 3 – Google Earth image of site with boundaries and proximity to housing evident**

- 1.2 The village is significant in scale, containing several dozen dwellinghouses, primary school and village hall. It also possesses good public bus service connections to Carmarthen and Lampeter via the A485 road. In other words, it is highly sustainable as a place to live and work, with Carmarthen only 5 minutes' drive by road..
- 1.3 The Representation Site indicative site layout plan is reproduced below as Figure 4. It illustrates for a cul-de-sac form of development with a total of 4 detached dwellinghouses set fronting an internal shared driveway, which can access the site through the undeveloped frontage between "Trysor" and "Llain Deg". The proposed form of layout and development is complementary in form to adjacent established form of residential layout at "Bro Dauddwyr" and "Bro Hyfryd", located to the immediate west of the site.
- 1.4 The site also presents an opportunity to form a pavement link across the frontage of Trysor, which is within the ownership of the client's family. The existing leylandii hedgerow can be translocated back to allow for an adequate visibility splay and in doing form a pavement about that frontage to allow existing and proposed residents to walk and cross to the existing pavement off the opposite flank of the highway.
- 1.5 We submit that the proposals put forward in the Representation Site encompasses the entire rear boundaries of existing properties and thus complemented that entire adjoining development in depth and form.





**Figure 4 – Indicative site layout plan of proposed Representation Site**

## **2.0 Overall Housing Supply at Peniel with Deposit Draft**

- 2.1 The proposals under this Representation merely seek the addition of a further 4 residential units to the overall housing supply of Peniel, to add to the 48 units already allocated within the draft Plan. Peniel is defined as sustainable settlement, and lends to the principal service centre centring upon the Carmarthen Cluster as defined within the draft LDP. The Carmarthen Cluster aims to provide an additional **1690 residential units** over the Plan period to 2033, and thus the addition of a small un-allocated site at Peniel of only 4 dwellings, in addition to the current draft of **47 units in the settlement** will not lead to an over-supply of dwellinghouses within the settlement nor Cluster.

Peniel		
SuV10/h1	South of Pentre	9
SuV10/h2	Aberdeuddwr / Pantyfedwen	38

### Proposed Housing Allocations at Peniel

- 2.2 Peniel is quite unique in terms of its positioning and setting being part of the Carmarthen Cluster. It is placed at the northern side of the defined area, being one of a number of settlements spread sporadically along the A485 Carmarthen to Lampeter road, and A484 road to Cynwyl Elfed. Peniel together with Rhydargaeau and Llanpumsaint and Bronwydd serve a rural hinterland. However, Peniel is however, unlike the other settlements, as it is **afforded with a Primary School** and consequently, there are few other defined settlements in this part of the County which contain such specific sustainable attributes.

Two sites have been allocated in Peniel, with one of which carried over from the 2014 adopted LDP, that being “land south of Pentre”. That site of 10 units is under construction, and will be complete in the next 6 months.

The other site at Aberddeudwr is a new allocation, referenced as Site SuV10/h2, and according to the Housing Schedule within the draft LDP Statement capable of providing 38 units. That allocation however appears to break from the built form of the village, by **extending to a new open field, north of the settlement**.

- 2.3 We submit that the proposals to site only 4 dwellings within the Representation Site will form a rounding-off of the eastern part of the settlement. 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
  - Conversion or the sub-division of large dwellings.
- 2.4 It is logical therefore that the same assessment criteria should be utilised in assessing whether or not a Representation 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 be included within the defined development limits of Peniel.

In conclusion, our clients have illustrated that their indicative proposals to construct a total of 4 dwellinghouses will not appear at odds to the prevailing spatial pattern of development in Peniel. 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 land to the rear of Trysor 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 Peniel realigned to include the whole 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 Richard A. Banks.

**Richard A. Banks**  
**Director**

Enc.

Cc client