

Our Ref.: 1034b/RAB

Date: 31<sup>st</sup> March 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 N. Bundock  
Land off Nant-y-Glyn Road, Glanamman, Ammanford**

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

Our client owns an agricultural holding which is set to the rear of residential properties and fronting the southern flank of Nant-y-Glyn Road, on the western edge of Glanamman. The land comprises low-grade, rough pasture which also borders detached and semi-detached housing which are orientated to front that highway, and also lies directly individual housing set off the opposite, northern flank of the road as it extends westwards from the village core.

Our client’s land interests at the western edge of Glanamman benefit from an edge-of settlement location, immediately adjoining established housing, and set fronting Nant-Y-Glyn Road, which is of sufficient width with footways and alignment. The site also lies within walking distance of the settlement’s community facilities, including a medical surgery and pharmacy, and public bus service. It can be regarded as **inclusive** within the settlement form.

Our client therefore seeks inclusion of their land as an **Alternative Site** for a future **Residential development** within the defined settlement limits of Glanamman within the Replacement Local Development Plan.

The Site comprises a single rectangular-shaped field frontage, and generally level to gently sloping grazing field set off the immediate southern flank of Nant-y-Glyn Road. The field is naturally screened from Nant-y-Glyn Road by existing frontage residential properties to the east, and virtue of a perimeter of mature trees and scrub about the far rear, southern field

perimeter and also western side of the field, where mature hedgerows and trees screen the paddock from wider views. The Figure 1 below provides a Google Earth image of the site.



Figure 1 – Google Earth – April 2021 – of Representation Site

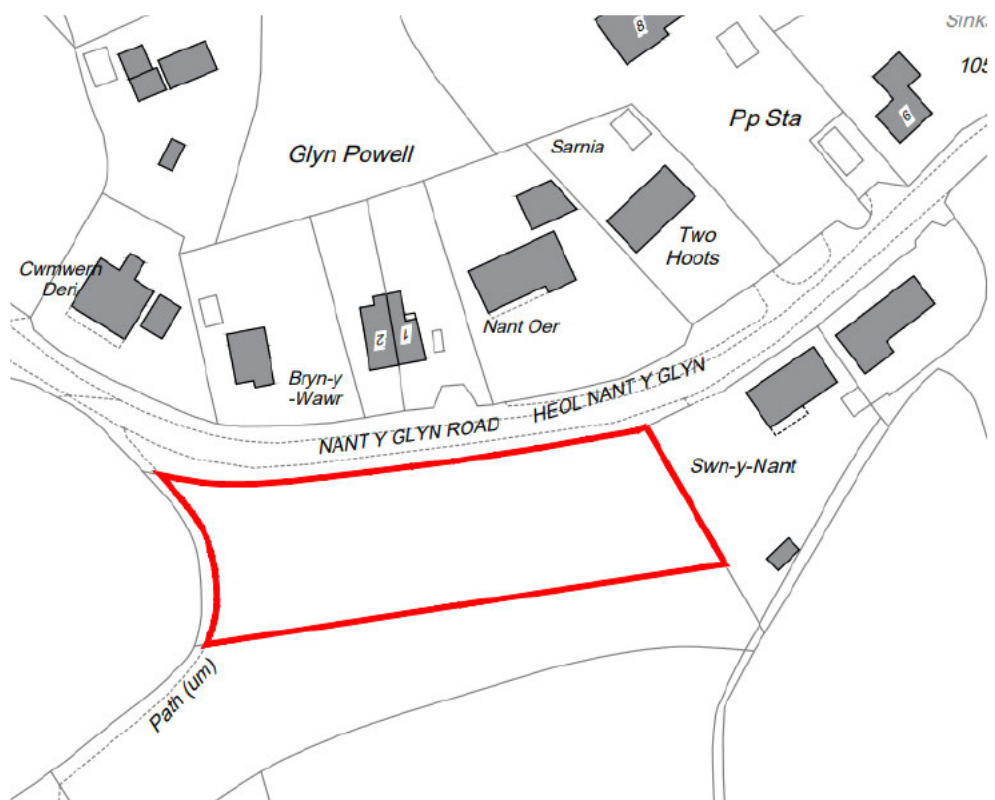
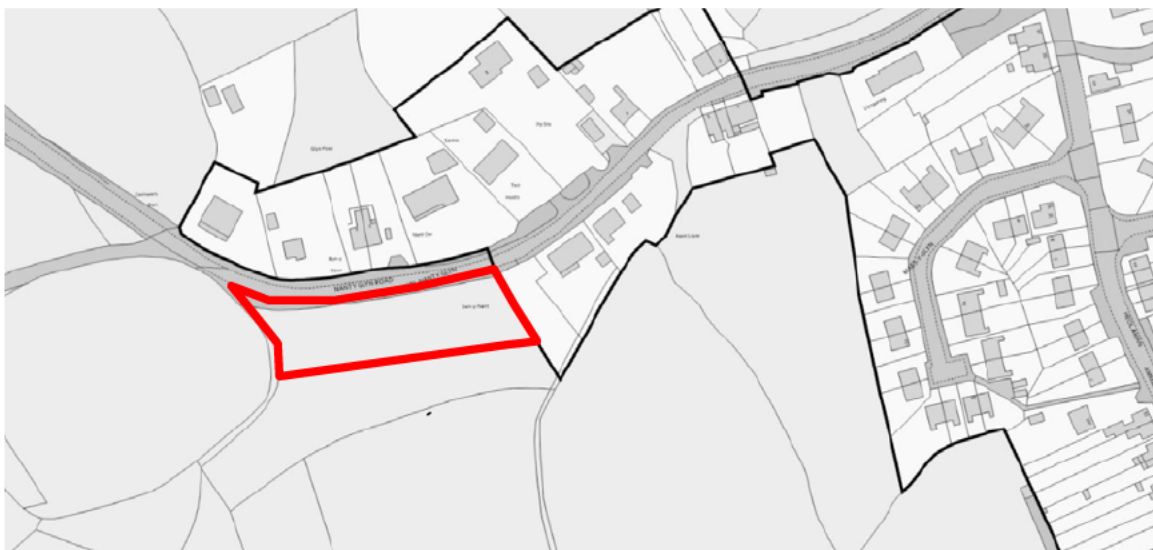


Figure 2 – Ordnance Survey Map extract of Representation Site

We have noted that the draft settlement limits have been placed along the rear garden boundaries of existing residential properties, but which also includes an undeveloped building plot off Nant-y-Glyn Road, and to the north-eastern edge of the field.

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 Glanamman / Garnant, 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 Glanamman / Garnant, as reproduced below in Figure 3. The land should be appropriately allocated for Housing under Policy HOM1.**



**Figure 3 – Extract from Proposals Map with Representation 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
- Location plan and Indicative Masterplan

## **Reasons for Allocation as Residential Development within Settlement Limits**

### **1.0 Position within Residential Setting at Nant-y-Glyn Road**

- 1.1 The Council within the Settlement Framework of the LDP, have categorised Glanamman as a Tier 2 “Local Service Centre”, as it benefits from a range of retail and community facilities and has good public transport links to the nearby Principal Service Centre of Ammanford. In such circumstances, the introduction of a modest residential allocation to the edge of Glanamman certainly meets the spatial criteria for locating new dwellings as part of the settlement form.
- 1.2 In terms of its physical location, the Representation Site is flanked on one side by residential development, with the field enclosure extending over a field frontage of some 95 metres, equivalent in form to the opposite, northern flank of this section of highway, with frontage properties at Nant-y-Glyn Road orientated to face the Representation Site.
- 1.3 Nant-y-Glyn Road itself continues from this point for only a few hundred metres to join Heol Amman and the range of community facilities including public bus stops (Services 145 & 146 to and from Ammanford). In the context, the site **is directly related to the settlement, with proposed occupants able to easily access facilities and public transport**. Consequently, the proposals would meet the relevant initial criteria of the Policy SP16 where new residential development should seek to be placed in sustainable locations, accessible on foot / cycle to the settlement’s range of community and commercial facilities and services.

### **2.0 Representation Site Proposals**

- 2.1 This submission is accompanied by an Indicative site layout plan which indicates an indicative setting for a frontage of detached, two-storey dwellinghouse to be orientated to front the public highway and thus mirror the established residential properties over the opposite, northern flank of Nant-y-Glyn Road. Figure 4 below provides a reproduction of that Plan which seeks to provide paired accesses onto Nant-Y-Glyn, and dwellings set back to allow for adequate parking and turning facilities. Traditional rear gardens of a minimum of 10 metres depth would be typically arranged, with the rear perimeter of the site denoted with new hedgerow planting.



**Figure 4 – Indicative Site Layout Proposals**

2.2 The Representation proposals would ensure that massing of scale was sensitively designed with buildings not rising to more than two storeys. The development of the field frontage will not necessitate re-modelling of ground levels given that the field is gently undulating towards its southern extremity and corresponds to the ground levels of adjoining Nant-y-Glyn properties, as shown in the photographs below.



**Photo 1 – view looking east along Nant-y-Glyn Road with field frontage to right and established housing directly opposite**



**Photo 2 – view westwards along public highway with younger trees and scrub evident along site frontage**



**Photo 3 – the site has limited ecological value being semi-improved grassland with pockets of scrub to roadside**

### **3.0 Sustainable Location**

- 3.1 The Site at Nant-y-Glyn Road lies off a public highway which extends about a local-authority-built estate and onto Heol Amman. Public bus stops lie only some 300 metres distant from the site access at Maesybont and Tabernacle Road. Main public bus services call at these bus stops, and in particular:
- Service 145 – Cwmamman to Ammanford, via Garnant and Glanamman
  - Service 146 - Ammanford to Cwmamman via Garnant and Glanamman
- 3.2 The Site is within 10 minutes' drive, or journey by public bus, to the Heart of Wales rail service at Ammanford station.  
Local Industrial Estates at Station Road and Raven Industrial Estate are a 10 minutes' walk from the Site.
- 3.3 The Alternative Site lies within a 5 minutes' drive distance of Ysgol-y-Beddol, which is located near the junction of Hendre Road with Maes-y-Beddol.

Glanamman contains a post office, range of convenience stores, petrol filling station, medical surgery, pharmacy, play facilities, community centre, public houses and cafés.

Ysgol Dyffryn Aman and Coleg Sir Gar at Tir-y-Dail are located a 10-minute road journey from Glanamman.

- 3.4 Ammanford town centre provides a whole range of large food supermarkets, comparison shops, high street banks, public houses / cafes, offices, bus station, industrial estates, library and leisure / recreation facilities.

Figure 5 below provides an indication of the proximity of the Alternative site to Glanamman village centre at Cwmamman Road, and nearby Ammanford town centre, bus and rail stations, and strategic road network.

The red star denotes the position of the Representation Site.



**Figure 3 – proximity of Site to Glanamman village centre, Ammanford town centre and major road network**

#### **4.0 INFRASTRUCTURE CONSIDERATIONS**

- 4.1 Development of the Alternative Site for residential units would be served by mains water, gas, public sewer and electricity connections, which either lie within the adjoining stretch of Nant-y-Glyn Road, and adjoining Maes-y-Glyn estate.

- 4.2 The public highway itself is equipped with roadside gullies and drainage which aid to discharge run-off from the extended carriageway. The Site comprises of former agricultural pasture. There are no areas of water-logging evident, and therefore at first inspection, it appears that the site benefits from good ground percolation of rainwater and discharge to existing perimeter drainage ditches.

Soakaways would be the most sustainable means of disposing of surface water from individual buildings. If required, attenuation measures can be deployed on site to control surface water run-off during extreme storm events, which could also allow for additional capacity, making allowances for climate change. The field enclosures are served by a series of drainage ditches along the field's boundaries, which eventually combine and inter-connect discharging surface water to minor watercourses flowing eventually to discharge into the River Aman. It is considered that as a result of on-

site features, there would be several options available to a future development of the site in terms of surface water disposal.

- 4.3 We have also referred to The Coal Authority Map detailing “Development High Risk Areas” and the location of historic mine entries. Figure 6 below is an extract from that map, and which confirms that the site is free from any mining legacy.

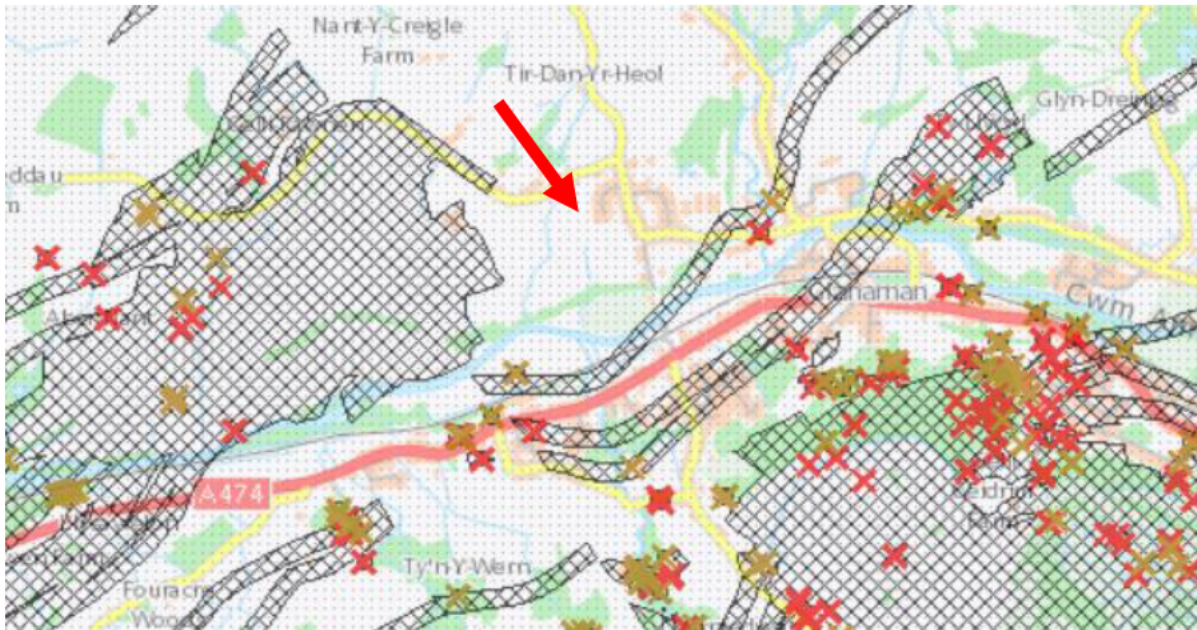


Figure 6 – extract from Coal Authority interactive map with site hig

## 5.0 Housing Land Availability in Glanamman / Garnant

- 5.1 Despite being a Tier 2 Local Service Centre, Policy HOM1 indicates only two sites allocated for housing in the whole of Glanamman and Garnant. An extract from that HOM1 schedule is reproduced below.

| Glanamman / Garnant |                                    |    |
|---------------------|------------------------------------|----|
| SeC10/h1            | Garnant CP School, New School Road | 12 |
| SeC10/h2            | Land adj. No 13 Bishop Road        | 8  |

Figure 7 – Housing Allocations at Glanamman and Garnant



5.2 The re-development at the former Garnant Primary School **have already been completed**, whilst the site at Bishop Road has been advertised for sale for the last few years without any apparent success in being sold. Therefore, for a settlement with several thousand residents, there are no residential development opportunities. The development of the Alternative Site for only five additional dwellings will not place any burden whatsoever, or indeed compromise housing land supply.

## **CONCLUSION**

This Representation to the Second Deposit Draft of the Revised LDP has sought to promote the inclusion of an **Alternative Housing allocation** on land off Nant-y-Glyn Road in Glanamman.

Our client has illustrated that their indicative proposals to develop a small site of frontage dwellings to mirror that currently in existence off the northern, opposite flank of the road. Accordingly, the development of the field frontage with five detached dwellinghouses will not appear at odds to the prevailing spatial pattern of development in Garnant / Glanamman. The locality has numerous examples of modern frontage development being completed at edge of settlement locations, which in turn, advocates that the form of development proposed for modest housing numbers 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 Garnant / Glanamman realigned to include the Representation Site in the Proposals Map of the adopted Local Development Plan.

Yours sincerely,



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

Enc.

Cc client