

Our Ref.: 1304b/RAB

Date: 30th 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 C. Davies
Land part of Blaenplwyf House, Llanybydder**

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

Our client owns a small holding set at the south-western approaches to the town of Llanybydder. The agricultural holding falls to a roadside boundary with the A485 Carmarthen to Lampeter road, and is marked by the presence of a pair of semi-detached houses, together with compacted farmyard set alongside with its own independent vehicular access onto the A road. They are seeking inclusion of a very modest parcel of farmyard for future residential development within the defined settlement limits of Llanybydder within the Replacement Local Development Plan.

This formal Representation relates solely to the non-inclusion of ALL of this established farmyard 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 Llanybydder, 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 Llanybydder, as reproduced below in Figure 1.**

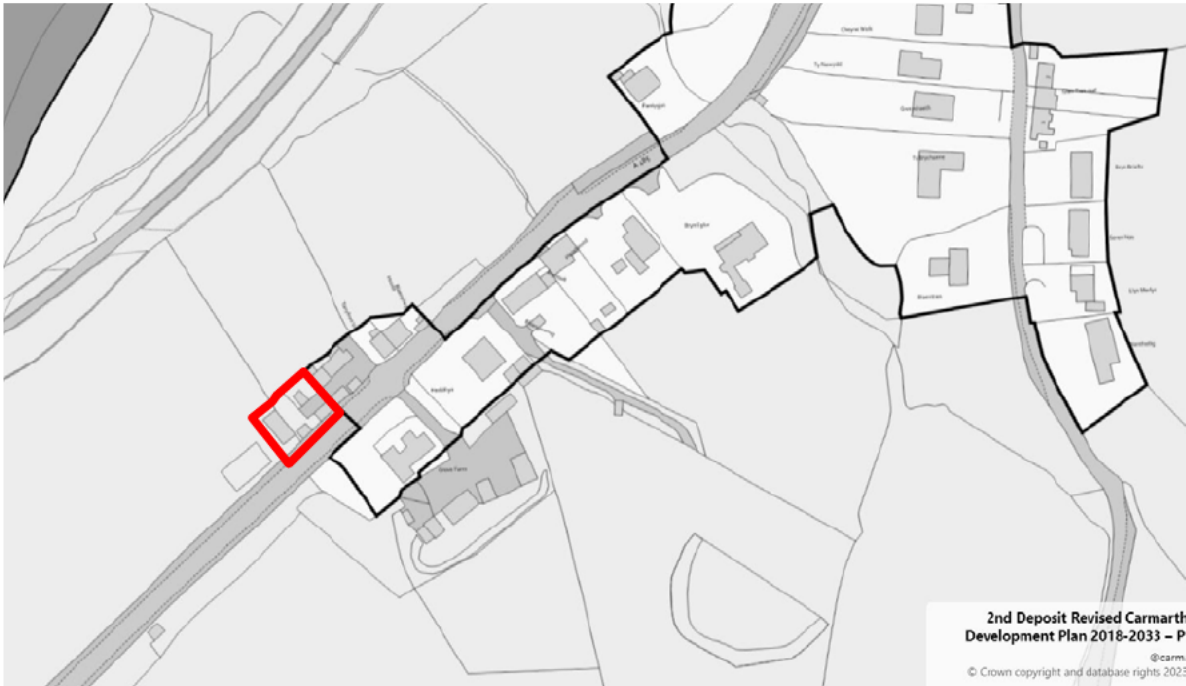


Figure 1 – Extract from Second Draft of Proposals Map with site edged in red

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 Llanybydder Draft Settlement Limits

1.0 Integration of Site with Character and Setting of Locality

- 1.1 The Representation Site consists of a generally level farmyard, equipped with a range of agricultural outbuildings, ranging from portal framed sheds to brick-built workshop outbuilding and open-sided metal sheeted shelters. The Second Draft of the Replacement LDP has repeated the settlement limits currently adopted in 2014 and imposed a settlement limits **carving straight through this farmyard**, so the consequence is that half the outbuildings lie inside the settlement limits, whilst the western half do not. There appears to be no logic or rationale reasoning for the segregation of the farmyard in this manner, and the Representation merely seeks all the farm outbuildings to be included within defined settlement limits.

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

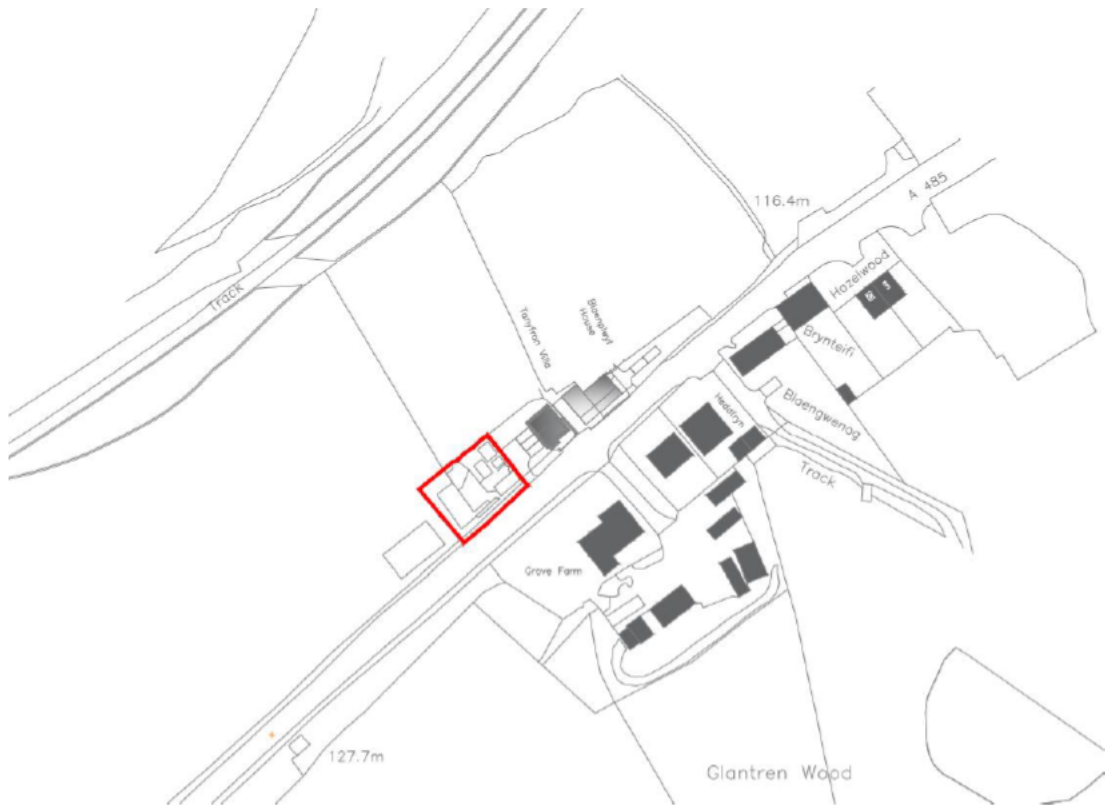


Figure 2 – Location plan of site with boundaries edged in red



Figure 3 – Google Earth image of site with whole farmyard in evidence, compacted about the site vehicular access

- 1.2 The Representation Site is shown in the following photographs where the distinction between which outbuildings are contained within settlement limits and those which lie outside is not readily apparent.



Photo 1 – extent of farm outbuildings at Blaenpwlyf



Photo 2 – outbuildings contained actually within settlement limits

- 1.3 An indicative site layout plan is reproduced below as Figure 4, where it is considered that the farm outbuildings could be replaced with a sensitively designed detached dwellinghouse to mirror that proposed under Planning **Application PL/02326**. That application proposes the removal of rather unsightly outbuildings and construction of one-three bed detached house with the existing farm entrance improved to provide enhanced visibility standards for all users. That application proposal involves the eastern part of the farmyard contained within settlement limits, but ideally, our client wishes to remove all the farm buildings and construct a second identical dwelling directly over the footprint of those redundant western outbuildings as shown below.



Figure 4 – indicative site layout plan of proposed replacement of farm buildings with single dwelling

- 1.4 The site is shown above as extending to built farmyard only, and **not encroaching into the adjoining open pasture**. Accordingly, the redevelopment of the farmyard would not encroach into the surrounding countryside, and not otherwise potentially detracting from its openness and rural character.

It also resembles “rounding-off” given the presence of Grove Farm directly opposite, off the southern flank of the A485, where a significant proportion of the side curtilage of that property is located within limits.

2.0 Conclusion

2.1 In conclusion, our client has illustrated that their indicative proposals to construct a single, additional dwellinghouse will not appear at odds to the prevailing spatial pattern of development in Llanybydder. The locality has numerous examples of minor additions to the extremities of defined settlement limits, where opportunities to replace old outbuildings with new sensitive development can be achieved. This example 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 Llanybydder be 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

Enc.

Cc client