

Our Ref.: 1603a/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 Mrs M. Jones  
Land at Brodawel, Trevaughan, Carmarthen**

We are instructed by Mrs M. Jones to make a formal representation to the “soundness” of the Deposit Draft of the Carmarthenshire Local Development Plan.

Our clients made a formal Candidate Site Submission in August 2018, which was referenced **SR/021/014**, seeking inclusion of their land for future residential development within the defined settlement limits of Carmarthen within the Replacement Local Development Plan. The Candidate Site comprises the field frontage and modest range of former agricultural outbuildings set off the western flank of Trevaughan Road, directly opposite the Is-y-Bryn, at the northern-most part of Trevaughan.

We have noted that part of the Candidate Site is included within the draft settlement limits, that being a field frontage set off the northern gable of the dwelling known as Brodawel to the southern side of a small grouping of former agricultural outbuildings. However, **the compacted range of outbuildings has not been included** within the Second Draft settlement limits. This formal Representation to the Second Draft relates solely to part of the unsuccessful part of the Candidate Site to include those physical buildings.

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 all the site was not selected for inclusion within the settlement limits of Trevaughan, near Carmarthen, as contained within the Second Deposit Draft.

We note that the submission successfully passed through Stage 1 (site compatible against the location of future growth presented in the Preferred Strategy) but failed to proceed through Stage 2A (Initial Detailed Site Assessment) of the Council's site assessment, with reasons for non-inclusion reported as follows:

*"The site cannot accommodate 5 or more dwellings. Part of the site will be included within development limits and will contribute to the small sites supply component."*

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 Second Draft settlement limits for Carmarthen, 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 Carmarthen, as reproduced below in Figure 1.**



**Figure 1 – 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 Deposit Draft Consultation stage:

- Completed Deposit LDP Representation Form
- Location plan indicating proposed realignment of settlement limits at Trevaughan

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

### **1.0 Inclusion of Physical Outbuildings as part of Trevaughan Road street frontage**

- 1.1 The Council have realigned the settlement limit from the current adopted (2014) Proposals Map of the Local Development Plan, to include part of the field frontage adjoining Brodawel in the Second Draft of the Replacement LDP. However, they have stopped short of including the existing modest range of outbuildings that are to be found off the northern side of the newly included field frontage.
- 1.2 The very compacted yard lies just before an acute bend in the C class Trevaughan Road but is very much positioned to be part of the filed frontage. The outbuildings are set back by some 10 metres from the near edge of highway carriageway and equipped with its own vehicular access and concrete surfaced apron. The outbuildings in question are graphically shown by the Google Earth image reproduced below as Figure 2, and Streetview image at Figure 3, taken in April 2022.



**Figure 2 – Extract from Google Earth (April 2021) illustrating the existing outbuildings**



**Figure 3 – Existing outbuildings as viewed from public highway upon Streetview (April 2022)**

- 1.3 As can be seen from the above photograph from the public highway, the existing outbuildings form part of the roadside setting at this approach into the settlement of Trevaughan. The dwelling known as Brodawel can be seen as a close backdrop, with neighbouring dwellings to be found forming a continuous frontage of development off the opposite eastern flank of the main road.
- 1.4 The inclusion of the existing outbuildings in new settlement limits will not involve any encroachment into open countryside but merely allow the limits to include an established compact of modest outbuildings and thus to provide a formal and definitive edge to the settlement.

In conclusion, this Representation to the Deposit Draft of the Revised LDP has sought to include existing outbuildings into the Second Draft settlement limits of the Local Development Plan. Such a very modest realignment will not compromise the Plan's aims at safeguarding the adjoining countryside for its own sake, nor pose any detriment to the visual setting and character of this semi-rural locality.

We respectfully request that this Representation be given careful examination, and consequently the defined settlement limits of this part of Carmarthen be realigned to include the Representation Site in the Proposals Map of the adopted Local Development Plan.

Yours sincerely,

[Redacted signature]

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

Enc.

Cc client