

Carmarthenshire County Council
Forward Planning Section
3 Spilman Street
Carmarthen
Carmarthenshire
SA31 1LE

20 March 2023

Our ref: 0906

Your ref:

BY EMAIL ONLY TO forward.planning@carmarthenshire.gov.uk

Dear Sirs

**2nd Deposit Revised Carmarthenshire Local Development Plan 2018-2033
Representations on behalf of Swallow Investments Limited**

Having reviewed the 2nd Deposit Revised Carmarthenshire Local Development Plan 2018-2033 (hereinafter referred to as the LDP), via:

<https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/second-deposit-revised-local-development-plan/#.Y-9SSWTP1D8>

I have been instructed by my client to make general representations to a number of the LDP's Policies and paragraphs; and specific representations to Policy HOM1, relating to housing allocation ref. PrC3/h4, on Land at Tirychen Farm, Dyffryn Road, Ammanford. I have therefore enclosed a Representation Form, completed as necessary, which should be read in conjunction with this letter setting out my client's representations to the 2nd Deposit Revised LDP.

General Representations to Section 8, Paragraphs 8.6 to 8.8 and 8.20

Section 8 of the LDP considers a number of alternative Strategic Growth and Spatial Options to support the delivery of housing and employment growth in the County.

Regarding Strategic Growth Options, paragraphs 8.6 to 8.8 of the LDP confirm a preferred 'Ten Year Trend Based Projection', forecast to deliver 8,822 new dwellings (588 new dwellings per year) and 276 new jobs per year over the LDP period 2018-2033. Regarding Spatial Options, paragraph 8.20 of the LDP confirms a preferred 'Balanced Community and Sustainable Growth Strategy', whose key components are summarised in paragraph 9.57 of the LDP to include these targets for new dwellings and new jobs, distributed to the County's most sustainable locations in accordance with a Settlement Hierarchy, whilst recognising the need to support the County's rural areas and rural economy.

My client **supports** the LDP's preferred Strategic Growth and Spatial Options – they will deliver new housing in line with requirements and new jobs to match the same; and represent an optimistic, though not unrealistic set of assumptions and aspirations, geared towards encouraging housing and economic growth in the County over the LDP period.



General Representations to Section 11, Strategic Policy SP1

Strategic Policy SP1 reflects the LDP's preferred Strategic Growth and Spatial Options, confirming *inter alia* provision of 9,704 new dwellings to meet a requirement of 8,822 new dwellings over the LDP period, distributed in a sustainable manner consistent with the LDP's Spatial Strategy and Settlement Hierarchy. My client **supports** Strategic Policy SP1 – it sets the context for delivering new housing in line with requirements; and represents a sustainable and optimistic, though not unrealistic strategy geared towards encouraging and delivering new housing in the County over the LDP period.

General Representations to Section 11, Strategic Policy SP3

Strategic Policy SP3 builds on Strategic Policy SP1 by confirming that the provision of growth and development will be directed to sustainable locations in accordance with a Spatial Framework based upon a four Tier Settlement Hierarchy, with the County divided into six Settlement Clusters. My client **supports** Strategic Policy SP3, in particular the designation of Ammanford/Crosshands as a 'Tier 1 Principal Centre' at the top of the Settlement Hierarchy in the County's Settlement Cluster 3. In this respect, Ammanford/Crosshands is a highly sustainable location to which new housing and employment development should be directed; and it is entirely appropriate for the settlement to be positioned at the top of the County's Settlement Hierarchy.

General Representations to Section 11, Strategic Policy SP4 and Paragraphs 11.71 to 11.74

Strategic Policy SP4 confirms that in order to meet the requirement for 8,822 dwellings over the LDP period, 9,704 new dwellings will be provided between 2018-2033, in accordance with the LDP's Settlement Framework. My client **supports** Strategic Policy SP4 - it sets the context for delivering new housing in line with requirements, with a reasonable and realistic 'buffer' to ensure those requirements are satisfied; and therefore represents a sustainable and achievable strategy for meeting the County's housing needs over the LDP period.

Moreover, my client **supports** paragraphs 11.71 to 11.74 of the LDP, which confirm that the majority of new residential development, including housing allocations (defined in paragraph 11.79 of the LDP as sites capable of yielding 5 dwellings or more), will be directed to the County's Tier 1 Principal Centres.

Specific Representations to Policy HOM1 and Housing Allocation Ref. PrC3/h4, on Land at Tirychen Farm, Dyffryn Road, Ammanford

I made representations for my client on 13 August 2018, in response to your Authority's 'Call for Candidate Sites', requesting that land at Tirychen Farm, Dyffryn Road, Ammanford, be considered as a 'Candidate Site' for allocation for housing in the Revised LDP. My client is the Freehold owner of the land, as edged in red and blue on the enclosed Location Plan ref. 09-012/01 REV B.

In response to these representations, land owned by my client at Tirychen Farm, Dyffryn Road, Ammanford, was included within your Authority's Candidate Sites Register of December 2018 under refs. CA0326 and SR/004/012, as in principle suitable and appropriate for allocation for housing. The extent of land concerned is shown shaded in red on the enclosed extract from your Authority's interactive Candidate Sites map, which is available via:

<http://carmarthenshire.opus4.co.uk/planning/localplan/maps/candidate-sites#/x:261756/y:212431/z:10/b:14/o:2305>

I made further representations for my client on 14 January 2019, in response to your Authority's Candidate Sites Register consultation, putting forward the case for allocating Candidate Site ref. CA0326 (Site Ref. SR/004/012) in the LDP for circa 330 dwellings. Having reviewed the 2nd Deposit Revised LDP and in particular Policy HOM1, I note that land owned by my client at Tirychen Farm, Dyffryn Road, Ammanford, is proposed as an allocation for 150 dwellings, under ref. PrC3/h4 and as shaded in brown on the enclosed extract from the LDP's interactive Proposals Map, which is available via:

<https://carmarthenshire.opus4.co.uk/planning/localplan/maps/2nd-deposit-revised-carmarthenshire-local-development-plan-2018-2033-proposals-map#/center/51.7938,-4.0059/zoom/16/baselayer/b:31/layers/o:9423,o:9424,o:9435,o:9436,o:9437,o:9446,o:9447,o:9448,o:9449,o:9524,o:9525,o:9526,o:9527,o:9528,o:9529,o:9530,o:9531,o:9532,o:9533,o:9560,o:9561,o:9562,o:9563,o:9564,o:9579,o:9580>

Whilst the principle of housing allocation ref. PrC3/h4 is **supported** by my client, it is considered that the current terms of the allocation must be improved upon. In this respect, my client's **objections** to housing allocation ref. PrC3/h4 are set out in the following paragraphs.

You will be aware that land owned by my client at Tirychen Farm, Dyffryn Road, Ammanford is currently allocated for 250 dwellings in the Carmarthenshire Local Development Plan (LDP) 2006-2021, under ref. GA3/h17 in Policy H1. Moreover, the site benefits from an extant outline consent ref. E/38686 granted on 8 October 2019 (as a renewal of outline consent ref. E/21663 granted on 10 October 2014) for 289 dwellings, with access and layout granted in detail at the outline stage, as per the enclosed copy of consented Planning Layout ref. 09-012/05 REV F.

The site's existing allocation ref. GA3/h17 for 250 dwellings in Policy H1 of the Carmarthenshire Local Development Plan 2006-2021; and the terms of the site's extant outline consent ref. E/38686 for 289 dwellings clearly and unequivocally demonstrate that the site is suitable and sustainable, and available and achievable. At the very least, therefore, allocation ref. PrC3/h4 in the 2nd Deposit Revised LDP should be increased from 150 dwellings to 289 dwellings, to reflect the fact that the site is a consented 'commitment' for 289 dwellings in Ammanford - a highly sustainable Tier 1 Principal Centre at the top of the County's Settlement Hierarchy.

However, the site's allocation ref. PrC3/h4 in the 2nd Deposit Revised LDP can easily be enlarged to match the boundaries of Candidate Site ref. CA0326 (Site Ref. SR/004/012) included within your Authority's Candidate Sites Register of December 2018, making best use of available land that is mostly already allocated and indeed, already consented for housing. Planning Layout ref. 09-012/05 REV E enclosed, showing a detailed layout for a total of 336 dwellings, was first submitted with outline application ref. E/21663 on 20 August 2009; and demonstrates that enlarging the site's allocation ref. PrC3/h4 to match the boundaries of Candidate Site ref. CA0326 (Site Ref. SR/004/012) could be achieved without any harmful impacts upon the locality – the enlarged allocation would be contained in the landscape and by retained woodland in my client's ownership; and would be integrated with the 289 dwellings already consented under the terms of outline consent ref. E/38686. In this regard, please refer to the enclosed Landscape Masterplan ref. SP17000 10A, which was also first submitted with outline application ref. E/21663 on 20 August 2009.

Furthermore, enlarging allocation ref. PrC3/h4 to yield circa 80 additional dwellings over and above the 'committed' 289 dwellings that are already consented on the site would avoid the need to make an equivalent housing allocation elsewhere in the County. As such, my client requests that housing allocation ref. PrC3/h4 in Policy HOM1 of the 2nd Deposit Revised LDP is confirmed for circa 330 dwellings, using the boundaries of Candidate Site ref. CA0326 (Site Ref. SR/004/012) contained within your Authority's Candidate Sites Register of December 2018.

I hope you will find this letter and the enclosed helpful and that you will take account of and act upon my client's representations when progressing the 2nd Deposit Revised LDP. I would be grateful if you would keep me updated with the LDP's progress and in the meantime, please contact me if you have any queries with this letter, or if you need to discuss any matter in more detail.

I look forward to hearing from you in due course.

Yours faithfully
for MatPlan Limited



Matthew Utting BSc(Hons) DipTP MRTPI
Director



Encs.

Copy: Swallow Investments Ltd.