



**REPRESENTATION STATEMENT**  
**TO**  
**REPLACEMENT CARMARTHENSHIRE LOCAL**  
**DEVELOPMENT PLAN 2018-2033**

**FORMAL OBJECTION TO POLICY HOM1**  
**SITE PrC1/MU1 - WEST CARMARTHEN**

**Our Ref:** LDP-HOM1-PrC/MU1

**Date:** April 2023

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## 1.0 INTRODUCTION

- 1.1 Evans Banks Planning Limited act for a number of landowners and have made formal representations in respect of those clients' land interests in relation to the Carmarthenshire Replacement Local Development Plan (2018-21): Second Deposit Draft. Within those Representations, we have referred to previous Candidate Site submissions made in August 2018. The Council in response to those Candidate Site submissions have published a Site Assessment Table (January 2023). We have noted in rejecting Candidate Sites, the Council has on multiple occasions concluded that a Candidate Site should not progress and be allocated as "*there is sufficient land allocated for housing growth elsewhere in the Plan.*"
- 1.2 Policy HOM1 "Residential Allocations" refers to the schedule of sites put forward by the Council as draft residential allocations to meet housing growth over the Plan Period.
- 1.3 This Statement will focus upon a significant allocated site with the Carmarthen Cluster (Cluster 1) that being Site PrC1/MU1 at West Carmarthen. The Schedule of Residential Allocations at Policy HOM1 indicates that 700 residential units are proposed and anticipated to be brought forward over three "Delivery Timescales", namely over Years 1-5 (2018-23), Years 6-10 (2024-28) and Years 11-15 (2029-33). The Schedule, however, indicates for 291 "units beyond the Plan Period."
- 1.4 On behalf of our clients, we herewith lodge a formal representation in objection of the Residential Allocation. We submit that the Council's expectations for the delivery of this site are unachievable based upon its lack of progress since allocation within the adopted Carmarthenshire Local Development Plan 2008-21. This Statement will focus upon the slow progress of the site evidenced by not only lack of applications for full planning permission, but also the low build rates upon the modest areas on the site where works have been completed. A noticeable lack of active site marketing further compounds the argument that the level of allocation is unrealistic.

## 2.0 SITE CONTEXT IN SECOND DEPOSIT DRAFT

- 2.1 The West Carmarthen Strategic Residential Site (PrC1/MU1) is part of a Mixed-Use Allocation, made under the provisions of Policy SG1 “Regeneration and Mixed-Use Sites” which in the case of West Carmarthen states that the site is provided for “*Mix of uses consisting of residential (an allowance for 700 new homes within this plan period), employment, community facilities and amenity. A key deliverability indicator is the Carmarthen West Link Road which is now completed and open.*”
- 2.2 The site is shown upon the Proposals Map for Carmarthen as reproduced below as Figure 1, and extends over several dozen hectares of open, undulated, former pasture, set off the northern flank of the A40 Trunk Road, extending west from Old St Clears Road to Travellers Rest.

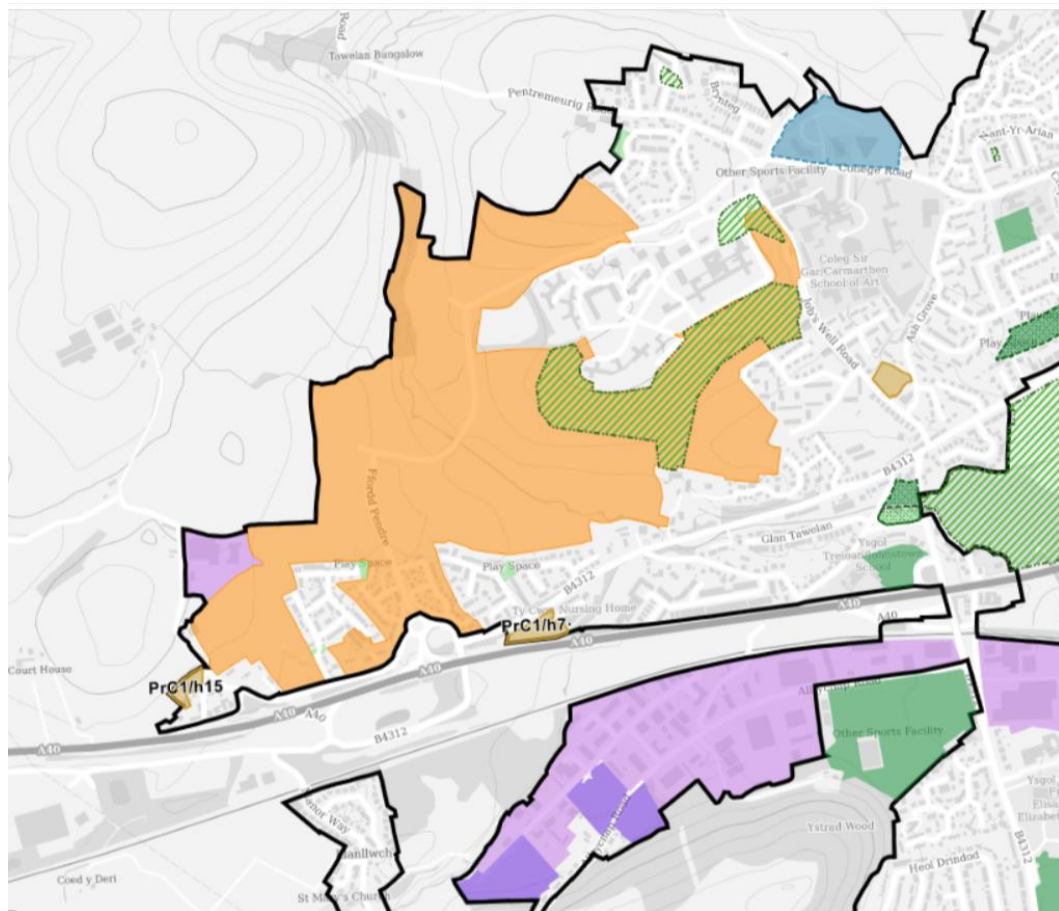


Figure 1 – Extract from Proposals Map showing extent of Site PrC1/MU1

2.3 The southern extent of the allocation shows it wrapping about newly constructed dwellinghouses known as Maes Pedr. To the east of that series of cul-de-sacs, lies further residential cul-de-sacs, known as Maes Macsen and Clos Elen, which extend off Ffordd Pentre, being the main spine distributor road running south to north off its roundabout junction with Llysonnen Road. The road was built in recent years and provides a link about West Carmarthen linking north to junction with College Road and Job's Well Road some two kilometres to the north-east of the above-named residential cul-de-sacs. Figure 2 below provides a Google Earth image of the residential development as of April 2021, whilst Figure 3 shows the state of development progress back in **June 2018, which coincides with the start of the Replacement LDP Plan Period.**



**Figure 2 – Google Earth – April 2021 – illustrating extent of development at southern part of West Carmarthen at that time**



**Figure 3 – Google Earth – June 2018 – illustrating extent southern part of West Carmarthen at that time at start of Replacement LDP Period**

2.4 The above Google Earth images reveal that extent of housing building at had taken place up to June 2018, and what had been developed up to the latest image in April 2021. We have calculated that from the start of the Plan Period in 2018 to September 2021, **a total of 90 units were completed**. Therefore, from the LDP allocation capacity of 700 units, there **remains a balance of 610 units at this time**. Construction of new units has ceased since September 2021, and has not continued since.

### 3.0 Progress since Adoption of Local Development Plan in 2014

3.1 The Carmarthenshire Local Development Plan was adopted in December 2014. The Plan is scheduled to run over a Plan Period from 2008 to end of 2021. The Site at West Carmarthen was allocated for Mixed Use in that Plan for a total of 1100 residential units (referenced GA1/MU1). Figure 4 below illustrates the extent of the allocation for the current adopted Plan.

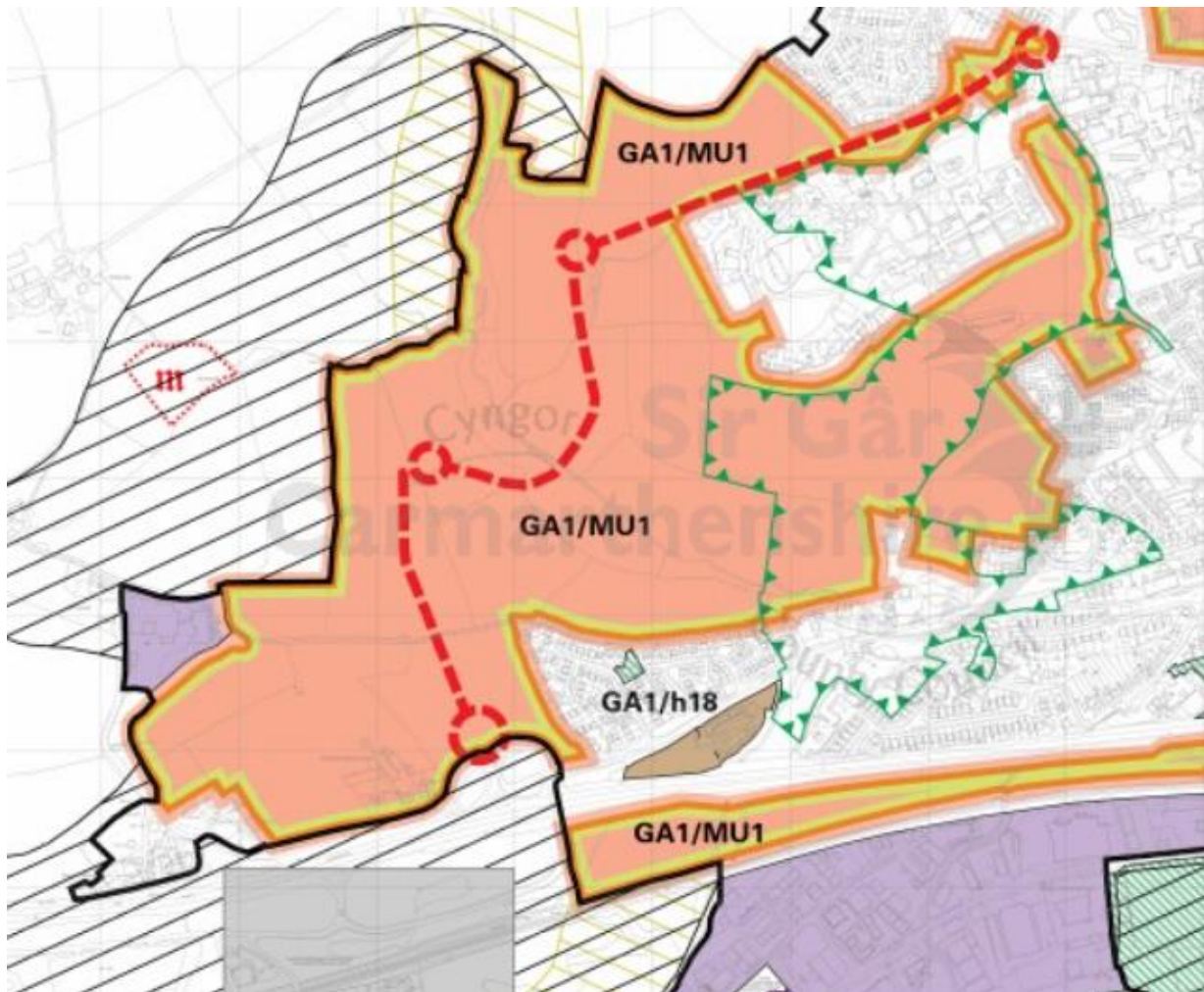
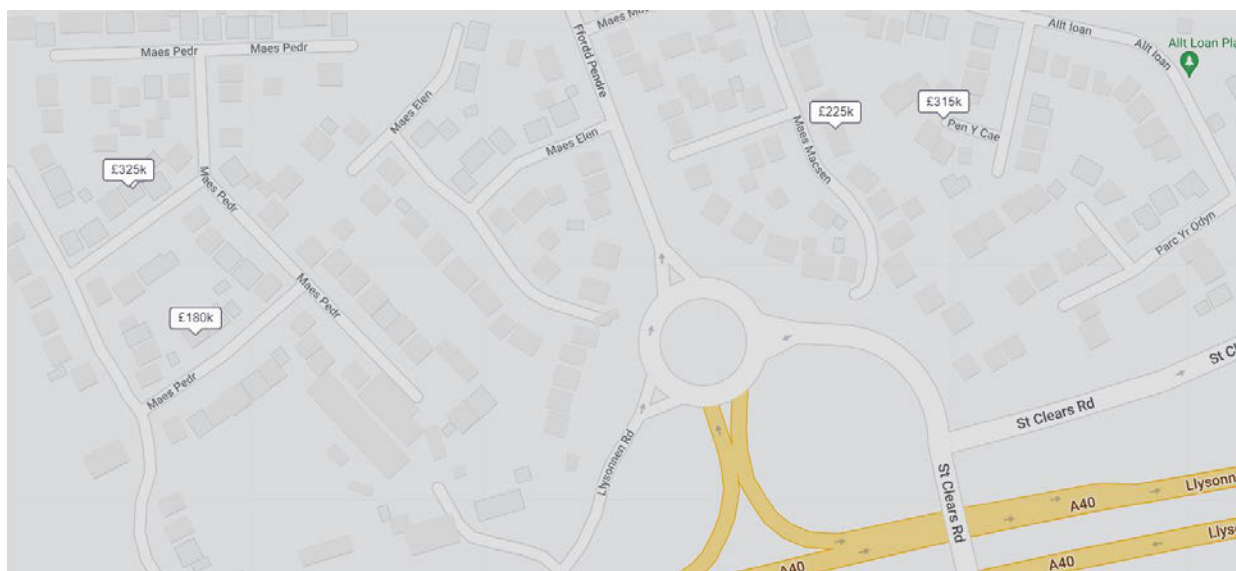


Figure 4 – 2014-adopted Local Development Plan for Allocation GA1/MU1

3.2 We have calculated that of that 1100 units **only a total of 141** were constructed between the Plan Adoption date of December 2014 and start of this Replacement

LDP Plan Period of 2018. Since 2018, a **further 90 units** have been constructed. Land Registry records that the **last completed unit** was sold at Maes Maccsen in September 2021 (18 months ago). “Rightmove” provides details of selected new house sales over the last 20 years in this part of Carmarthen. The last new house transaction with the last property being at Maes Maccsen in September 2021, as shown in Figure 5 below.



Address	Postcode	Last recorded date of ‘New Build’ property being sold
Maes Maccsen	SA31 3DA SA31 3FA	24/09/2021
Ffordd Pendre	SA31 3FD	11/12/2020
Maes Elen	SA31 3FB	24/09/2021
Pen y Cae	SA31 3SD	28/05/1999
Parc y Odyn	SA31 3SE	24/07/1998
Allt Ioan	SA31 3SB	03/03/2000
Maes Pedr	SA31 3BW SA31 3BR	30/08/2018

**Figure 5 – Sales Transactions in West Carmarthen from Rightmove – March 2023**

3.3 Therefore, since adoption of the 2014 LDP, only a **total of 231 units** have been completed, equating to a build rate over that 7-year period of **only 33 units per annum**. This build rate is considerably lower than the anticipated and much promised

delivery of 1100 units in the Plan Period of 2014 to 2021, **which would have expected an annual build rate of 157 units.** An actual return of 33 units per annum equates **to only a 21% build rate return** on that anticipated for delivery in the 2014-21 Plan.

- 3.4 Only 39 of those units were built in 2017-18 accordingly to the Joint Housing Land Availability Study 2018. The 2019 Study reveals that only a further 5 units were constructed in 2018-19. The August 2019 Study reports that **none were under-construction at that time.**

During 2020 and 2021 when Covid-19 restrictions were at their peak, more units were constructed than at any other time in that LDP plan period. Therefore, we would submit at this point in our formal objection that **low build rates cannot be held, and probably will be subsequently argued by the Council, to be reduced as a consequence of Covid-19 restrictions.**

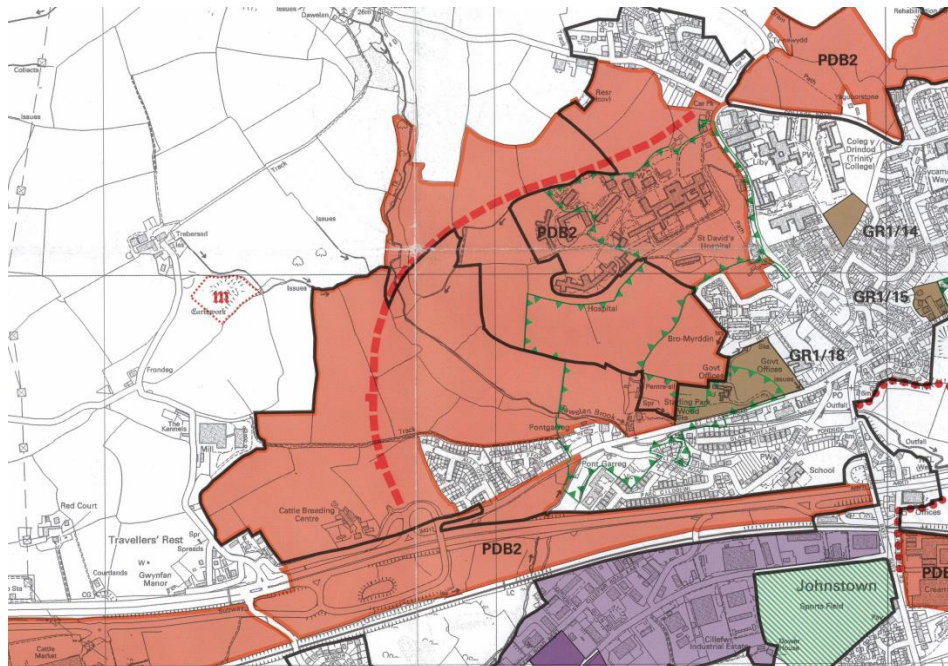
- 3.5 **It is equally noteworthy that at a time when the housing market and sales values were at their most buoyant in 2022, that the only housebuilder with a track record on the site (Permission Homes) had ceased construction and sold their last completion (September 2021). We submit that this is testament to the weak marketability and sales demand of the West Carmarthen Site.**

- 3.6 **Only 231** units out of 1100 units of the MU1 Strategic Site have therefore been completed in the 2014-21 LDP period, which equates to **only 21%** of that allocated total.



## 4.0 CARMARTHENSHIRE UNITARY DEVELOPMENT PLAN 2001-16

4.1 The Carmarthenshire Unitary Development Plan was adopted in June 2006. The land at West Carmarthen was allocated as a Strategic Site under Policy E15 and referenced as Site PDB2. A Development Brief was to be prepared with an emphasis on a mixed-use including **housing**, employment, link road and community facilities. Figure 6 below provides an illustration of the Proposals Map from the UDP.



**Figure 6 – Unitary Development Plan Extract of West Carmarthen**

4.2 It is therefore abundantly clear that the West Carmarthen site has featured as a Strategic Development Site for the last 22 years, and in that time, the number of new housing constructed has amounted to only 241 units at Maes Pedr and Maes Macsen.

## 5.0 OBJECTION TO OVER-ALLOCATION IN SECOND DEPOSIT DRAFT LOCAL DEVELOPMENT PLAN

- 5.1 The Replacement LDP seeks to delivery 700 units over a Plan Period from 2018 to 2033. The extract from the Proposals Map for Carmarthen reveals that the figure includes for 90 units constructed between 2018 and 2021, leaving a balance of **610 units envisaged in the remainder of the Plan Period to 2033**. That would equate to a build rate of **61 units per annum over a 10-year period**. Based upon previous build rates at this site, such a predicted build rate can be described as overly optimistic, being **nearly double that actually achieved on the site to date**.
- 5.2 We noted that planning permissions have been granted by the Council on part of the LDP allocation. Figure 7 provides a breakdown of planning applications submitted over the West Carmarthen site over the last 8 years since adoption of the LDP in 2014. The applications are coloured coded, and those colours correspond to the Google Earth extract at Figure 8 overleaf, which illustrates where each application site was situated.

- *W/32287 - CONSTRUCTION OF 100 RESIDENTIAL DWELLINGS AND ASSOCIATED WORKS INCLUDING INITIAL PHASE OF CARMARTHEN WEST DISTRIBUTOR ROAD*  
*Full Granted – 18/11/2015*
  - *W/30286 - RESIDENTIAL DEVELOPMENT FOR 110 DWELLINGS*  
*FULL GRANTED – 03/06/2015*
  - *PL/05492 - Erection of nine dwellings*  
*Full Permission Sought (23/02/2023) – In Review*
  - *PL/04717 - Residential development (21 houses) including works to increase the width of the highway pavement across the frontage of the site*  
*Full Permission Sought (20/10/2022) – In Review*
  - *PL/04627 - Residential development of 92 dwellings and associated landscaping and infrastructure*  
*Full Permission Sought (14/09/2022) – In Review*
  - *W/27776 - DEVELOPMENT OF LAND FOR RESIDENTIAL USE*  
*Outline Planning Granted (25/05/2018)*  
*PL/01626 – Removal/Variation of Condition 3 (extension of time) – In Review*
- Current LDP**
- *W/31177 - PROVISION OF TWENTY-SEVEN 2, 3 AND 4 SEMI-DETACHED AND TERRACED HOUSES (06/01/2015) FINISHED*
  - *W/29312 - PROPOSED ROAD AND PLOT LAYOUT AND DETACHED PROPERTY*  
*FULL GRANTED – 30/08/2016*

**Figure 7 – Planning Applications at Carmarthen West 2014-2023**



**Figure 8 – Location of Planning Applications 2014-2023**

- 5.3 The details reveal that the initial 110 houses granted in 2015 (red area) have all been completed and are **not part** of the 700-unit allocation in the Second Deposit Draft. The grey coloured area totals 100 units and has been completed, 90 units of which took place during the current Years 1-5 of the Replacement LDP.
- 5.4 The orange area and green areas formed part of the larger 1100 units allocated on a larger allocated area under the 2008-21 LDP. They have been subsequently completed totalling 31 units. However, as calculated above, do not form part of the draft allocation for 700 units in the current Second Draft.
- 5.5 The purple and pink areas to the northern side of the allocation have not been developed, but have been subject to applications for planning permission since 2018.

The purple area achieved outline planning permission in May 2018 under W/27776. It was valid for three years, and **therefore lapsed in May 2021** – some two years ago. However, a Section 73 application to extend the time period for receipt of Approval of Reserved Matters was submitted in March 2021, just before it was due to otherwise lapse. The submission was registered as PL/01626. Yet, **after a period of some 24 months, it has yet to be determined.** We note that the land is owned by the Applicants, “Carmarthen Promotions Limited” based in Nottingham, according to Land Registry Title records.

5.6 The pink land is currently the subject of an application for full planning permission for 92 dwellinghouses by Persimmon Homes. Application PL/04627 was registered on 14<sup>th</sup> September 2022, yet at the time of writing **remains undetermined.** If that development does achieve permission and is completed within the Pan Period, it would only raise the build total at West Carmarthen to 182 units since 2018. A figure which represents only **26%** of the 700 capacity quoted in Policy HOM1.

5.7 We note that the Council has been marketing their land holdings for sale. Figure 9 below is a reproduction from Sales Particulars where the Council were seeking “Expressions of Interest” on a 3.4-hectare field enclosure north of the red area. That area has **never benefitted from any planning permission, let alone application submitted upon it for residential development.** It is not clear as to what feedback and actual completed questionnaires were received by the deadline in February 2023. However, it is surprising that it has taken the County Council **some 9 years** to begin to market their land asset at West Carmarthen. The land has been part of the GA1/MU1 allocation since adoption in 2014, and there has been no attempt to seek a Developer Partner throughout all this time. We submit that such a sales practice is now only emerging as a consequence of the current Second Deposit Draft Plan, which has jolted the landowners into some form of initial action on the site.

The field in question is relatively level and assuming the LDP capacity expectation of 35 units per hectare is achievable, the 3-hectare site could achieve a total of 115 units. Yet, no firm proposals have yet to materialise on this part of the Strategic Site

allocated in the Second Draft. There is uncertainty and lack of progress in bringing this part of the allocated site to fruition.

**RESIDENTIAL DEVELOPMENT OPPORTUNITY  
LAND AT CARMARTHEN WEST  
Ffordd Pendre, Carmarthen,  
Carmarthenshire, SA31 3BW**



- Circa 8.4 acres (3.40 hectare) of residential development land
- Part of the Carmarthen West strategic site with allocation for 1,100 homes, new school and employment use
- Within 2 miles of Carmarthen Town Centre
- Easy access to the A40, A48 and M4
- Requirement for the developer to provide 24 dwellings to be purchased by Carmarthenshire County Council on completion at a minimum specification
- Carmarthenshire County Council is running a Competitive with Negotiation procurement exercise to work in partnership with the Authority for the delivery of a residential scheme that meets the needs of the local community.

Further details are available at: <https://www.sell2wales.gov.wales>  
"Land at Carmarthen West – Residential Development Opportunity"  
[https://www.sell2wales.gov.wales/search/show/search\\_view.aspx?ID=JAN423987](https://www.sell2wales.gov.wales/search/show/search_view.aspx?ID=JAN423987)

**The closing date for Pre-Qualification Questionnaire submissions is Monday 13th February 2023 at 2:00pm**

All enquiries to be made via the messaging facility within the eTenderWales portal.  
<https://etenderwales.bravosolution.co.uk>  
(Project Code 44006, PQQ code 33330)



**Figure 9 – Sales Particulars of land north of Maes Pedr**

## 6.0 CONCLUSION

- 6.1 The Allocated Site at West Carmarthen is substantial in overall size. The Carmarthen Cluster is expected to deliver 1690 units over the Plan Period, and thus the Mixed-Use site contributes 41% towards that overall total. After 5 years of the Plan Period, only 90 units have been completed, representing only 5.3% of the Cluster 1 entire total. If that trend continued over the remaining 10 years of the Plan Period, it would contribute **only a further 180 units**. None of the site currently benefits from any form of planning permission, despite 9 years of being allocated in the 2008-21 LDP Plan. Only Persimmon Homes have contributed to the site, and only they have prepared and lodged an application for any future housing phase, being the current application for 92 units.
- 6.2 **We submit that the Allocated Site be dramatically reduced in scale to total only 300 units**. A total of 90 of those 300 units have been completed, leaving a further 210 units split over two field enclosures, and those being the current northern field, subject of the 2022 Persimmon application (pink area) and the Council's 3-hectare western enclosure, where another 110 units are achievable. **The remaining field enclosures should be omitted from the allocation, that being all land north and east of Ffordd Pentre.**
- 6.3 Clearly, there is no historic demand for a site of this scale in this part of Carmarthen. More physically challenging sites, such as the Roman Park site in Llangunnor by Redrow Homes, and the Mount Pleasant site (Maes Lewis Morris), also in Llangunnor, by Lovell Homes have come forward, and been fully completed, long before West Carmarthen.
- 6.4 The overwhelming majority of the allocation has underdelivered. We would refer and advocate to the Inspector to heed Welsh Government's Guidance provided in Development Plans Manual (Edition 3) (March 2020). Page 120 states: ***"Rolling forward allocations - Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered***

*and justify being included again. Clear evidence will be required that such sites can be delivered. The sites should be subject to the same candidate site process requirements as new sites i.e., they must be demonstrated to be sustainable and deliverable. If an LPA wishes to retain such sites but cannot evidence, they will be delivered, i.e., for aspirational or regeneration purposes, they can still be allocated in the plan but not relied upon as contributing to the provision. It will not be appropriate to include such sites in the windfall allowance. They should be treated as 'bonus sites'.*