

Our Ref.: 1133c/RAB

Date: 29<sup>th</sup> 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 Sauro Homes Limited  
Land off Bro Mebyd, Bancffosfelen, Pontyberem**

We are instructed by Sauro Homes Limited to make a formal representation to the “soundness” of the Second Deposit Draft of the Carmarthenshire Local Development Plan.

Our clients made a formal Candidate Site Submission in August 2018, which was referenced **SR/138/023**, seeking inclusion of their land for future residential development within the defined settlement limits of Bancffosfelen within the Replacement Local Development Plan. The Site off Bro Mebyd comprises an undulating former grazing field which is set south-west of a recently completed housing development. That site of Bro Mebyd comprises a total of 19 houses and bungalows which benefitted from a full planning permission, referenced S/32841.

The Candidate Site submission in August 2018 sought to include this first phase of completed development together with a second phase field within the draft settlement limits of the Local Development Plan, with an estate road branching off the first phase into the adjoining field.

We have noted that the first phase of Bro Mebyd as completed continues to be included within the draft settlement limits of the Second Draft of the LDP as Site SeC11/h2. This formal Representation relates solely to the unsuccessful part of the Candidate Site.

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 the site was not selected for inclusion within the draft settlement limits of Bancffosfelen, as contained within the Second Deposit Draft. We note that the submission successfully passed through Stage 1 (site compatible against the

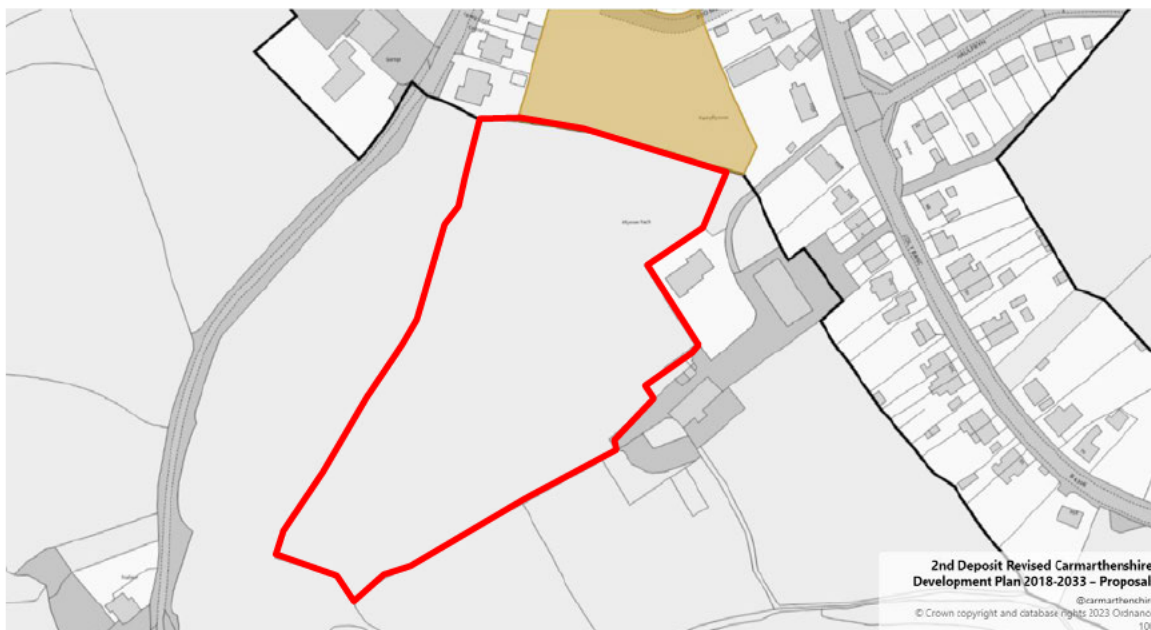
location of future growth presented in the Preferred Strategy) and Stage 2A (Initial Detailed Site Assessment) of the Council's site assessment.

It proceeded through a detailed assessment at Stage 2B (further detailed site assessment) and Stage 3 being a Sustainability Appraisal and Habitat Assessment. The reasons for non-inclusion of the south-western field / phase 2 are not given within the Site Assessment merely stating as follows:

*"Part of the site to be allocated for residential development. Site reference is SeC11/h2."*

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 Bancffosfelen, 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 Bancffosfelen, as reproduced below in Figure 1. The land should be appropriately allocated for housing under Policy HOM1 "Housing Allocations."**



**Figure 1 – Extract from Second Draft Proposals Map with 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 site layout plan

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

### 1.0 Physical Connection to Recently Completed Residential Site

- 1.1 The Candidate Site relates to part of the former farm holding of Ffynnon Fach. That former farmhouse and associated former farm outbuildings lie to the eastern side of the Candidate Site field. The south-western field lies directly off Bro Mebyd, with the estate road of that new development site able to be extended to allow a new cul-de-sac formation to be formulated.
- 1.2 The south-western field is undulating and occupies a land area of 1.2 hectares (4.5 acres) and is bounded by a continuous series of linear hedgerows, with occasional trees within that perimeter. It consists of semi-improved grassland, which has been grazed for generations and offers little in terms of biodiversity given its well-manage agricultural status.
- 1.3 The Candidate Site sought inclusion of the entire holding at Ffynnon Fach, with three additional field enclosures set south of the current south-western field, and south of Ffynnon Fach yard and outbuildings. Those southern fields are no longer sought for inclusion in the Local Development Plan, and the Applicants merely seek the inclusion of one former grazing field as presented upon the indicative site layout plan reproduced below. A total of **37 dwellinghouses** can be accommodated over a cul-de-sac layout, with each house equipped with side driveways to provide off-road parking, together with traditional rear garden space.

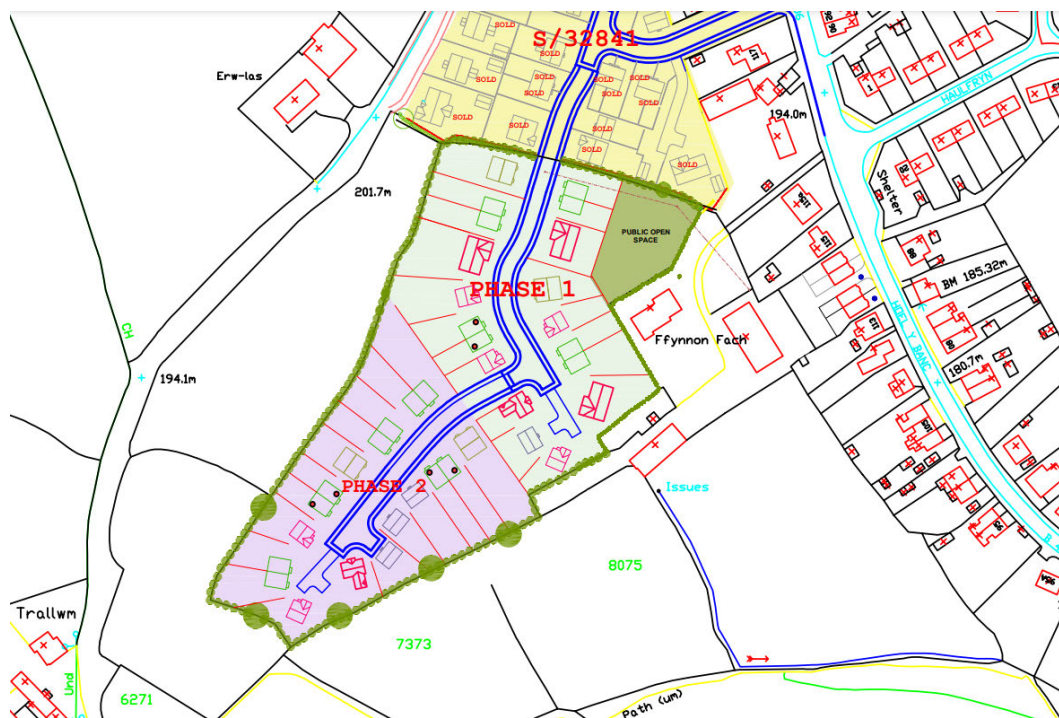


Figure 2 – Site Layout Plan of Second Phase of Bro Mebyd

- 1.4 The physical features of the Candidate Site are shown by Google Earth, which has captured the setting and physical form of the site in that the “defensible” boundary at the site is the encirclement of mature hedgerows, with the Ffynnon Fach house and associated yard and outbuildings providing a definitive built development off its eastern and south-eastern flank. Figure 3 below illustrates the current physical form.



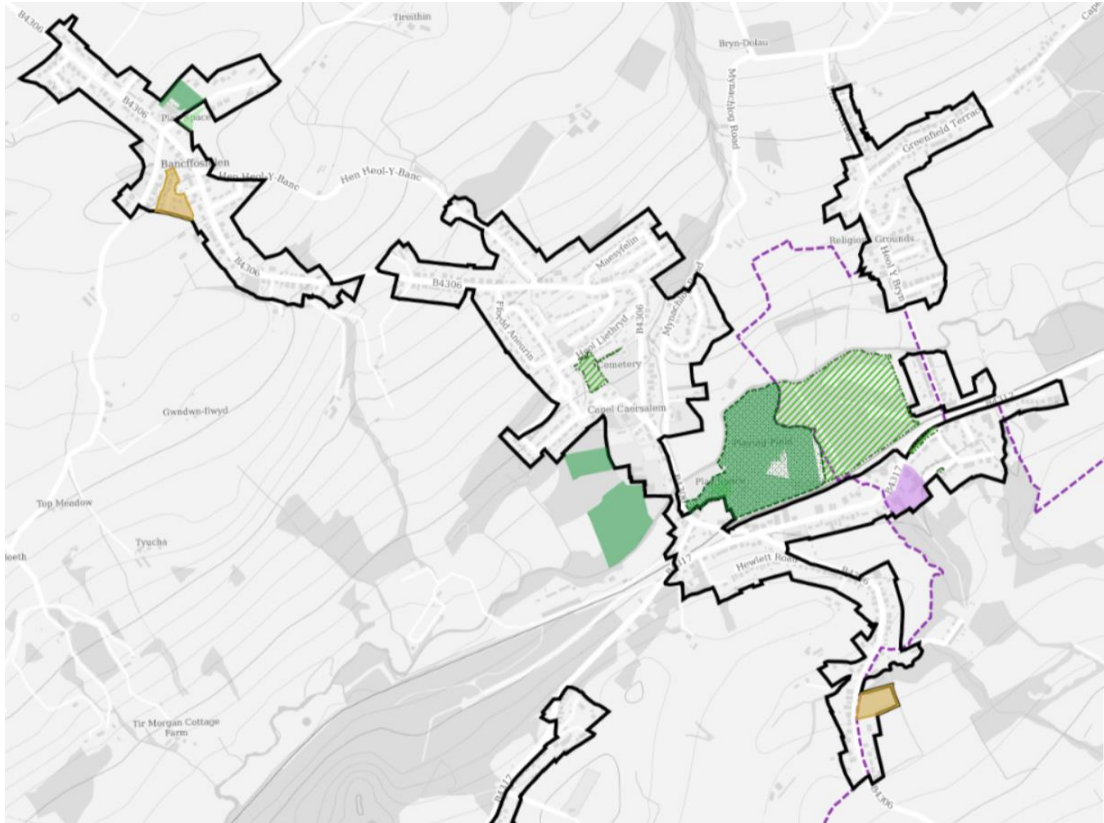
**Figure 3 - Extract from Google Earth (June 2021) illustrating the recent housing development at Bro Mebyg and Ffynnon Fach buildings to the east of the elongated field**

- 1.5 The above site layout plans illustrate that development will appear as one consolidated form off an established access off Heol-y-Banc (B4306 road), which already has been formed to cater for the additional traffic which would be generated by a second phase. In short, the development of the south-western field provides a logical extension to the settlement of Bancffosfelen, and which is bordered on two flanks by established built development.

## **2 Overall Housing Supply at Ammanford / Cross Hands with Deposit Draft**

- 2.1 The proposals under this Representation seek the addition of circa 37 residential units to the overall housing supply of the Ammanford / Cross Hands Cluster. Bancffosfelen is categorised as a Service Centre SeC11, which forms part of the Ammanford / Cross Hands Cluster as defined within the draft LDP.

The Ammanford / Cross Hands Cluster aims to provide an additional **1257** residential units over the Plan period to 2033, and thus the addition of an allocated site of 37 units will not lead to an over-supply of dwellinghouses within the Cluster. Policy HOM1 of the Draft Plan indicates that two sites are allocated for residential development in Bancffosfelen (Figure 4 below). Bro Mebyd's 19 units **have already been completed** as SeC11/h2. Figure 5 below illustrates those two sites, with the other site being Llannon Road capable of accommodating only 15 units.



**Figure 4 - Extract from Proposals Map indicating only two sites for housing**

Pontyberem / Bancffosfelen		
SeC11/h1	Land off Heol Llannon	15
SeC11/h2	Land at Ffynnon Fach	19

**Figure 4 – HOM1 allocations in Bancffosfelen**

2.3 We have examined and researched sites which have been brought forward as Residential Allocations with the Second Deposit Draft. On behalf of clients in this LDP Cluster, we have made formal Representations seeking the omission of the following draft Allocations:

### **Site PrC3/h14 - Nantydderwen - for 33 Units.**

The land was allocated Carmarthenshire Unitary Development Plan (2006). No progress was made in bringing the site forward, and yet it was allocated within the Local Development Plan in 2014. Consequently, **twenty years of Development Plan allocations** have elapsed without any signs of delivery of this site. Clearly, there is no historic demand for a site of this scale in this part of the Drefach area. More physically challenging sites, such as Cae Coch, Cae Pound at Cross Hands and Heol-y-Parc at Cefneithin have come forward despite topographic issues and previous ground contamination, and yet still the Council is prepared to allocate the site once again in a new Development Plan. The land is relatively level with immediate access onto the local highway network.

The decision to retain Nantydderwen after a period of 20 years within the LDP is shown to be inconsistent, as does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability.

### **2.4 Site PrC3/h22 Land at Pant-y-Blodau in Penygroes for 79 units.**

The land was allocated Carmarthenshire Unitary Development Plan (2006). The site was carried over and allocated as GA3/h35 in the Adopted 2014 LDP for 90 units. Planning Permission was granted in April 2015, and yet some 8 years later, no work has been undertaken on the site, and the land remains undeveloped. No indication is provided within the Site Assessment Report (January 2023) as to why the Council consider this long-standing allocation to remain in the Plan?

2.5 We submit that the draft allocations at Nantydderwen and Pantyblodau be omitted from the Plan, and that housing allocations be redistributed to modest Candidate Sites, of up to 37 units such as that proposed as a second phase of Bro Mebyd in Bancffosfelen.

2.6 There is clear evidence in the success and roll out of all 19 houses at Bro Mebyd that this site can be delivered and fulfil the housing need in Bancffosfelen. Such modest sites are far more likely to be brought forward and developed in full by regional and small housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.

2.7 In the case of Bro Mebyd its completion is a strong indicator of a healthy property market at Bancffosfelen. Consequently, it is a location where housing proposals are **deliverable, assisting to meet housing needs** in this part of the Ammanford / Cross Hands Cluster.

In conclusion, this Representation to the Deposit Draft of the Revised LDP has sought to examine the Council's reasons for non-inclusion of a Candidate Site.

Our clients have illustrated that their indicative proposals to construct circa 37 dwellinghouses. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, which in turn, advocates that the form of

development proposed at Bro Mebyd 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 Bancffosfelen realigned to include the Representation Site, as a Residential Allocation in the Proposals Map of the adopted Local Development Plan.

Yours sincerely,

A solid black rectangular box used to redact the signature of Richard A. Banks.

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

Enc.

Cc client