

Our Ref.: 1091.a

Date: 6<sup>th</sup> April 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 Mr M. Baggott  
Land at Cwmdwyfran, Carmarthen**

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

Our client made a formal Candidate Site Submission in August 2018, which was referenced **SR/037/003**, seeking the inclusion of the land within the defined development limits of Cwmdwyfran as part of the Replacement Local Development Plan. The Candidate Site sought frontage development of detached bungalows off the eastern flank of the A484 road in the village, to mirror established development off the western flank of the road. Further residential development lies immediately south of the site, and on the same, eastern flank of the main road.

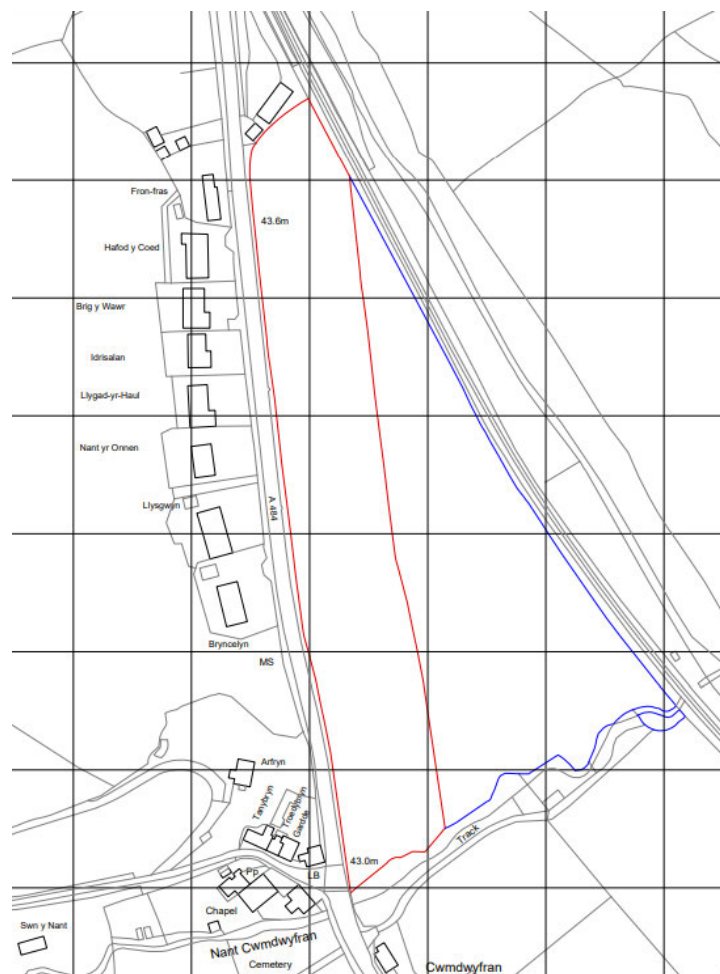
The northern extent of this field frontage is terminated by the physical presence of the Gwili Valley Railway line which runs parallel to the rear of the frontage field and tapers to its northern extremity, reducing its depth back from the highway to a level where no built development can continue. It therefore represented a logical opportunity for rounding-off within the settlement and providing a much-needed and deliverable residential opportunity which can generate a small number of modest bungalows. Its extents are illustrated by the site edged in red, being a site location plan, at Figure 1 below.

The Council published a First Deposit Draft of the Replacement Local Development Plan in January 2020. At that time, the Council revealed its analysis of a new “Settlement Framework” as referred to within Policy SP3 “Sustainable Distribution – Settlement Framework”, which categorised settlements in the County into Clusters and subsequently into Tiers. We note that the Candidate Site Register has distinguished Cwmdwyfran (SR/037) as a **separate settlement** from Bronwydd (SR/014) for the purposes of

assessment of representations. “Bronwydd” is accordingly listed as a Tier 3 “Sustainable Village.” “Cwmdwyfran” was **not listed**, and **neither was it listed as a Tier 4 “Rural Village”**. However, the First Deposit Draft LDP proposed settlement limits about the physical form of Cwmdwyfran.

The Second Deposit Draft has been published in January 2023, and we note that in response to our client’s formal representation under the First Deposit Draft consultation process, the Council have reverted their decision, and now named “Cwmdwyfran” as a Tier 3 settlement. Defined settlement limits are shown upon the Proposals Map and encircling the existing built development in the village. Our client’s Candidate Site is shown excluded from those draft settlement limits.

The Council have again published a “Site Assessment Table” (January 2023). We note at this time that our client’s land was considered as part of this process and as a result the Authority concluded that the site had 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). However, the Council failed the submission under consideration of Stage 2b (Further Detailed Site Assessment). The Council reported its conclusions as follows: *“Development of the site would result in a ribbon pattern of development changing the character of the area.”*



**Figure 1 – Extent of Candidate Sited edged in red**

We consider that omission is tantamount to the LDP being “unsound” and should be changed, as it fails to meet the tests for “soundness,” in that the Plan “is not appropriate,” as defined by the Planning Inspectorate’s LDP Examinations Procedural Guidance.

Specifically, we consider the approach of assessment taken by the Authority to such a categorisation has been inconsistent in terms of (a) other policy approaches taken by the Deposit LDP and (b) in relation to other Rural Village **named as Tier 4 settlements within the Carmarthen Cluster**. We submit that Cwmdwyfran should not therefore be afforded defined development limits within the Deposit LDP and accordingly be **named as a Tier 4 “Rural Village”**. We consider therefore that the settlement should be included within the settlements listed under Tier 4, **AND NOT TIER 3**, under the provision of **Policy SP3** of the Carmarthenshire Local Development Plan.

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

### **Reasons for Representation to Deposit Draft**

#### **Consistency with Other Policies of the Deposit LDP**

The Authority has provided no specific indication or guidance on how it has determined and defined development limits within the Deposit LDP. It has therefore been difficult to ascertain why some sites have been successfully included and others have not. Policy SP3 defines Tier 3 “Sustainable Villages” as being distinct those where settlement limits are defined and Paragraph 11.73 states “*the settlement framework will, in conjunction with specific policies, also guide the consideration of appropriate sustainable locations - with access to services and facilities - and scale of other developments.*”

The following paragraph (11.74) indicates that Policy SP3 “*sets out an indicative outline on the nature of development likely by tier including their scale and type.*”

**Tier 3 “Sustainable Villages”** are identified and will possess –

*Housing Allocations*

*Affordable housing on sites of 5 or more units*

*Small housing sites (under 5 homes).*

*Windfall housing opportunities*

*Small Scale Rural Exceptions Schemes for Affordable Housing adjoining settlement boundaries*

This is in contrast to **Tier 4 “Rural Villages”**, which are defined to contribute by means of:

*Small sites – housing through infill or logical extensions/rounding off.*

*Small Scale Rural Exceptions Schemes for Affordable Housing*

However, Policy HOM3 deals with small extensions to existing rural villages and so provides a useful series of criteria in determining where such extensions would be acceptable, namely the following:

- Minor infill or a small gap between the existing built form; or
- Logical extensions and/or rounding off of the development pattern that fits in with the character of the village form and landscape; or
- Conversion or the sub-division of large dwellings.

It is logical therefore that the same assessment criteria should be utilised in assessing whether or not development would be acceptable in Cwmdwyfran, as at present the draft settlement limit is so tightly drawn that it prohibits any development of even a single dwelling which would make an acceptable addition to existing development limits.

Cwmdwyfran is now categorised as a Tier 3 settlement but there is no available, undeveloped, or “white land” within the defined settlement limits to allow for a “housing allocation”, nor “Affordable housing on sites of 5 or more units,” “Small housing sites (under 5 homes)” and finally any possible “Windfall housing opportunities.”

**It other words, Cwmdwyfran does not possess any of the identifications or definitions of a Tier 3 settlement.**

### **Consistency with Other Tier 4 Settlements**

Consistency in approach and application is critical in order for the planning system to be both effective and credible to all its users. Without it, the system itself becomes unsound and in the case of the determination of the development limits for Cwmdwyfran, the Authority has been found to be inconsistent. Cluster 1 “Carmarthen” defines which settlements will not be afforded settlement limits, but small scale, minor growth is adjudged acceptable in line with criteria provided in Policy HOM3. The named **Tier 4 settlements** are listed overleaf.

<p><b>Tier 4 – Rural Villages</b></p> <p><b>(No development limits)</b></p>	<ul style="list-style-type: none"> <li>• Hermon</li> <li>• Abernant</li> <li>• Blaenycloed</li> <li>• Bancycafel</li> <li>• Nantycaws</li> <li>• Croesyceiliog</li> <li>• Crwbin</li> <li>• Felingwm Uchaf</li> <li>• Felingwm Isaf</li> <li>• Llanegwad</li> <li>• Pontantwn</li> <li>• Nebo</li> <li>• Talog</li> <li>• Penybont</li> <li>• Whitemill</li> <li>• Pont-newydd</li> <li>• Pontarsais</li> </ul>
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**Figure 2 – Extract from Policy SP3 of Tier 4 settlements in Cluster 1**

Figures 3 & 4 below are extracts of the Second Deposit LDP Proposals Map of two of those settlements, being equivalent in scale to Cwmdwyfran with some 30 or so dwellings – namely Pontantwn and Whitemill. Like Cwmdwyfran they are located upon primary A roads linked to Local Service Centres but are notably **defined as Tier 4 settlements**.



**Figure 3 – settlement form of Pontantwn from Second Deposit Draft**



**Figure 4 – settlement form of Whitemill from Second Deposit Draft**

As can be seen, two separate settlements, each with multiple numbers of houses- circa 30 units, have been categorised as Tier 4 settlements and thus will be allowed to expand in minor proportions **of up to an additional 10% of the total number of dwellings from the Plan base date**, provided those proposals constitute infilling or rounding off.

We submit that Cwmdwyfran is comparable with these two examples, if not all the 17 villages listed in Cluster 1 as Tier 4 settlements. However, the Authority's reverted decision to classify Cwmdwyfran now as a Tier 3 settlement is perverse. The Village resembles those listed Tier 4 Rural Villages in that it also does not possess any community facilities, such as primary school, convenience shop / post office, public house or village / community hall. The tight setting of draft limits at Cwmdwyfran is such that NO Development or minor housing growth is achievable for the next 10 years. This decision represents a clear inconsistency in approach taken by the Authority, resulting in the Plan as it stands being unsound.

In conclusion, we submit that the draft settlement limits for Cwmdwyfran be omitted from the Deposit Draft of the Revised LDP, and that the village be added to those settlements listed under Tier 4 within Cluster 1 of the Carmarthenshire Local Development Plan to ensure that the document passes all the relevant tests of soundness.

Yours sincerely,

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

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