



DESIGN
COMMISSION
FOR WALES
COMISIWN
DYLUNIO
CYMRU

10th August 2023

info@evansbanks.com

Dear Sirs

Re: Land adjoining Parc Pencrug and Maes y Farchnad, Llandeilo, Carmarthenshire

We are aware of the proposals for this development and have received considerable correspondence from concerned members of the public. We have also been contacted by elected members of the local authority and the local town council.

The developer, Pobl, has not engaged with the Design Commission early in the development process as best practice and as promoted in Planning Policy Wales. We are therefore providing comment on the materials made publicly available via yourselves as the planning consultants involved. It is disappointing that Pobl has not taken the opportunity to constructively engage with the Commission directly and much earlier in the design process, but we remain open to them doing so. We are particularly concerned that early engagement with the Design Commission has not been pursued by an organisation which is a signatory to the Placemaking Wales Charter.

We have the following comments based on the proposals:

The site was originally allocated in Carmarthenshire's development plan as part a larger allocation for a new northern quarter for Llandeilo. The development of the wider site would enable the new housing to be integrated with the wider town, which would be advantageous in enabling greater connectivity and providing active travel choices for

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people to walk and/or cycle to the schools, shops, the train station and other facilities in the town.

There is Supplementary Planning Guidance (SPG) providing a development framework for this northern quarter. Having reviewed this SPG, we note it was informed by engagement with the public and contains site analysis and design principles that would positively shape the development.

It is disappointing that the local planning authority appears to be proposing to reduce the site allocation in the emerging LDP and move from what was a strategic, designed approach to the growth of Llandeilo, to accommodating a proposal that seeks to develop a pocket of land in isolation and does little to integrate new housing with the wider town or secure wider public benefits.

The material presented in the pre-application consultation, including the Design and Access Statement (DAS), does not demonstrate a thorough design process. The DAS makes verbal reference to the requirements of PPW and TAN 12 however the design materials do not evidence an adequate response to either. The DAS refers to design only in terms of 'style and features' – neither of which reflect the characteristics of sound urban and landscape design process appropriate to high quality development.

There is no evidence of a satisfactory site and context analysis, no evidence of the testing of different options, no explanation of how the design has evolved, and no clear vision for the development and the kind of place it will be. The proposals fail to respond to placemaking and urban design principles. As a result, the scheme is generic and placeless, and there are significant issues which will need to be addressed if the development is to positively contribute to Llandeilo.

There appears to have been little meaningful engagement with the public, no consideration of the SPG and little thought about the needs of the people who will be living here. Pobl and Spring Design are signatories to the Placemaking Wales Charter, the principles and commitments of which are absent in these proposals.

- The development is accessible only from Parc Pencrug to the west. There are no other connection to the town and its facilities to the south and east. As a result, people would need to walk the long way around the town, including along main roads, and are likely to be reliant on private vehicles/driving. The proposals indicate routes that would require people living there to walk for over 20 minutes to reach the local primary schools. Such characteristics mean the development would be one which favours private car use and diminishes opportunities for carbon reduction, ease of active travel choices and may be considered exclusive for those people who may not own or have access to private vehicles.
- Opportunity for greater connectivity exist but does not appear to have been explored. The scheme should connect to Rhosmaen Steet, and ideally to the back of the schools, with new streets and paths designed to create a safe and pleasant route to school and the other facilities to the east and south. The materials do not demonstrate why these connections are not made.
- The development should future proof any further development to the east.
- The local bus service runs only every two hours and the train service four times a day. Greater consideration needs to be given to the implications of this lack of public transport and what measures the proposals can take to help address this deficiency. The local authority has role to play in this alongside the developer and public transport providers as well as in seeking active travel opportunities.
- Neither the site layout nor the house types show any evidence of being informed by, or responsive to, their context and setting.
- In addition to the historic context, the more recent Parc Pencrug development has qualities that warrant analysis and would provide useful reference. We encourage the design team to analyse what works and what doesn't in the Parc Pencrug development to help inform the design of this scheme.

- Consideration should be given to how different layouts and house types could better respond to the topography and orientation of the site and further consideration should be given to how the elevations can better respond to the character of Llandeilo.
- Most of the proposed houses have three off-street car parking spaces, promoting private vehicle dependency. This parking provision takes up considerable land – more than the homes themselves. This is an inefficient use of the land resource and appears to be impractical in its arrangement. The level of car parking should be reduced, and more sustainable forms of travel promoted.
- The streets offer a series of cul-de-sacs which favour an outdated highway-led approach to residential development and does not reflect either the Manual for Streets or placemaking principles as set out in Planning Policy Wales and reflected in the Placemaking Wales Charter and Guidance. A better connected, more varied street network, which may include greener streets, mews streets and/or shared surface streets should be explored.
- The open spaces and landscaping appear ill-defined and to be provided in response to constraints rather than design interventions aimed at meeting the needs of the people living there. These green spaces would be more successful with homes facing onto them and better public access to avoid underutilisation and poor surveillance.
- The SuDS elements could be better integrated throughout the scheme making a stronger contribution to amenity, nature and biodiversity. The landscape design and SuDS approach as a whole fails to respond to the opportunity to enhance the natural capital of the site and should be revisited.
- The location and design of the two blocks of flats for affordable homes needs further consideration. The flats should be in the most accessible location and are likely to benefit from being located on prominent corners and be designed to turn the corner. Further consideration also needs to be given to maximising the

benefits of the communal gardens and how residents would access them from their flats.

- Many of the gardens to the houses are split over two levels. Further consideration is needed as to how useable these gardens will be. Working with the site topography rather than against it could provide better solutions.
- The environmental sustainability commitments are unclear, are not apparent in the design approach and lack ambition to contribute to environmental benefits.

There is no material available regarding the smaller site adjacent to Maes y Farchnad or the opportunities which may present themselves therein.

Overall, the proposals as they are currently expressed in the materials available do not offer an integrated, place-led, sustainable development, maximising connectivity and opportunities for active travel choices. The plans do not respond to, or reflect, the requirements of national planning, design and placemaking policy, or the Placemaking Wales Charter. Significant opportunities are not captured, and it is difficult to understand how this would address a range of local authority policies or demonstrate a commitment to placemaking and its benefits.

Yours sincerely,



Carole-Anne Davies

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Ar gyfer ac ar ran y Bwrdd Cyfarwyddwyr - For and on behalf of the Board of Directors

NB

The opportunity for full, early strategic consultation with the Design Commission for Wales, through its Design Review Service, has not being taken in this instance. The

Commission has therefore reviewed materials internally by its team including Max Hampton, BA (Hons), MA MRTPI, Design Advisor; Jen Heal BSc (Hons), MA, MRPTI, Deputy Chief Executive and overseen by Carole-Anne Davies, Chief Executive.

A declaration of interest has been recorded for Mr Kedrick Davies and Mr Philip Roberts who are members of the Design Commission Design Review Panel. They are residents of Llandeilo and have therefore not been involved in DCFW's assessment of these materials.