



**Representations in respect of
the proposed allocation of land
at Emlyn Brickworks, Penygroes
Site ref PrC3/MU1
in the Second Deposit Carmarthenshire
Revised Local Development Plan (2018 - 2033)**

1. INTRODUCTION

- 1.1 These representations are submitted in response to the consultation by Carmarthenshire County Council ('the Council') on the Second Deposit Plan version of the emerging Carmarthenshire Revised Local Development Plan (2018 - 2033) ('the Deposit Plan').
- 1.2 These representations are made in respect of the proposed allocation of land at the former Emlyn Brickworks for the delivery of community focused development along with 177 new homes, site reference PrC3/MU1.
- 1.3 The relevant draft site allocation policy is SG1 (Regeneration and Mixed-Use Sites).
- 1.4 The site is shown on the Proposals Map.
- 1.5 Other relevant draft policies are SD1 (Development Limits) and SP4 (A Sustainable Approach to Providing New Homes).
- 1.6 These representations are made on behalf of Parc Emlyn Developments Limited ('Parc Emlyn'). Parc Emlyn own the majority of the land which the Council propose be included in the site allocation, and all of the additional land which Parc Emlyn propose be included.
- 1.7 In summary, the allocation of land at Emlyn Brickworks for a residential led mixed-use development is supported and the timing and number of new homes forecast to be delivered within the plan period is also supported. However, the arbitrary exclusion of a large portion of the existing allocated area from the proposed allocated area, and its exclusion from within the defined settlement boundary, is not sound.
- 1.8 Parc Emlyn seek an amendment of the allocation boundary. An Initial Masterplan drawing is submitted with these representations, the coloured areas of which depict the extent of the land which should be allocated.
- 1.9 These representations are also accompanied by a technical report, the Desk Top Study Review and Coal Mining Assessment (May 2022) by Tetra Tech (the Tetra Tech Site Review). The information submitted includes the main report and the three figures, but not the appendices, with the exception of an extract from Appendix B.

2. SITE LOCATION AND DESCRIPTION

- 2.1 The site lies within the village of Penygroes and is in Cluster 3 (Ammanford / Crosshands) of Tier 1 (Principal Centres); see Deposit Plan draft Strategic Policy SP3: Sustainable Distribution Settlement Framework and Appendix 7 (Housing Trajectory Allocations).

- 2.2 The site (both that proposed for allocation by the Council and the additional land proposed for inclusion by Parc Emlyn) formed the larger part of the Emlyn Colliery. The colliery operated from around 1880 until 1939¹. Part of the site was used as a brickworks (the Parc Emlyn Brickworks), starting before the closure of the colliery and operating until the mid 1990s.
- 2.3 The existing village wraps around the north, east and part of the south side of the site. To the west and along part of the south side, the site is bounded by open fields. The roads to the north, east and south are, respectively, Norton Road, Bridge Street / Waterloo Road and Gors Ddu Road. The neighbouring development is primarily residential, and on the east side includes the vacant former rugby club building. In the south west corner, just outside the site, is a small commercial site and beyond that further housing in the village of Morfa.
- 2.4 A newly constructed road (the Cross Hands Economic Link Road) lies a little further west of the site and a spur link road from that now crosses the site to link with Norton Road. The spur link road includes a roundabout, which has been designed so a third arm, serving the southern part of the Emlyn Brickworks site, may be connected to it at a later date.
- 2.5 The site is otherwise undeveloped. Most of it is covered by a layer of colliery spoil. Adventitious plant growth has developed across the site. The western side is bordered by a mature hedgerow. Along the eastern part of the northern boundary, there is an established line of tree and plant growth, which lies just outside the site.

3. PLANNING HISTORY

- 3.1 Following the closure of the site as a brickworks, applications for outline planning permission across different parts of the site were approved in 2000, with approval of reserved matters following in 2004. These permissions were extended in 2007. By this time all existing buildings across the majority of the former colliery / brickworks area had been demolished, the colliery spoil heap had been removed, and the entire site subjected to major earthworks whereby colliery spoil was redistributed across it. This was a major undertaking and a fundamental step necessary to prepare the site for new development. These works were the subject of a series of verification reports in 2007 (see the Tetra Tech Site Review, sections 4.17 to 4.20), to confirm ground contamination remediation had taken place.
- 3.2 Parc Emlyn Developments Limited (Parc Emlyn) took ownership of the site in early 2010. The existing permissions across the site were due to expire, so a series of new applications were made to extend them, which were approved in October 2010. The latter extended the permissions for schemes first put together ten years earlier. In July 2012 Parc Emlyn brought forward the first application for full planning permission, based on an updated assessment of

¹ 'Penygroes, Caerbryn a Blaenau – History of the area in pictures' by L Davies, D Thomas and A Davies (2011) Penygroes History Society

how best to develop the site. This opening application for nine units was approved in March 2013. A subsequent application for a minor amendment was submitted in January 2014 and approved in April 2014. This development was subsequently built out. It is referred to as Phase I.

- 3.3 The current Local Plan for the period 2006 to 2021 was adopted by the Council on 10 December 2014. It confirmed the allocation of the entire Emlyn Brickworks site for a mix of uses consisting of residential (250 units), community facilities and amenity (site reference GA3/MU2).
- 3.4 In July 2015 an application was submitted by Carmarthenshire Council for the construction of the Cross Hands Economic Link Road. This included a spur link to Norton Road, across land owned by Parc Emlyn. On 1 September 2015 an application was submitted by Parc Emlyn for full planning permission for 70 homes (referred to as Phase II). There was an overlap between the two application areas, such that they could not both be implemented. Planning permission for the Link Road was granted in October 2017. Subsequently, a new application for the spur link only was submitted in December 2019, which avoided any overlap with the scheme for 70 homes on Phase II. The revised spur link road application was granted by notice dated 10 September 2020.
- 3.5 During the course of site investigations to inform the application for the Link Road, ecologists acting for the Council (as applicant) found evidence of the presence of dormice, a protected species, on sections of the main link road. The location of this evidence was in sufficient proximity to the Phase II area that the potential for dormice to be present on Phase II had to be taken into consideration. Following investigation and assessment, a way forward in principle on the planning application (subject to conditions) was agreed by Natural Resources Wales in August 2022. Subsequently, Parc Emlyn and the Council have been working together to enter into a planning obligation in respect of some of the matters arising from the application for Phase II. The issue of the formal decision is imminent.
- 3.6 The time taken to bring the application on Phase II to a conclusion has held back work on the remainder of the site. The grant of permission for Phase II will re-establish the confidence necessary to resource the preparation and submission of further planning applications. In addition, the Link Road, including the spur link, has been completed and opened, which affords new suitable means of vehicular access to the remainder of the site. This is another major step forward, supporting the delivery of development on the site.
- 3.7 In January 2018 the Council resolved to prepare a revised local plan. Between February and August 2018, the Council invited submissions from developers and others for sites to be allocated for development (candidate sites). A candidate site assessment questionnaire was completed and submitted to the Council for Emlyn Brickworks. The Candidate Site reference is SR/132/009.

- 3.8 At that time a development partner (Low Carbon Construction Ltd) was leading on all planning matters, on behalf of Parc Emlyn. The candidate site questionnaire for Emlyn Brickworks was submitted by representatives acting on behalf of Low Carbon. The questionnaire was accompanied by a Location Plan (dwg 09.99.T/JE July 2018 by JCR Planning), an Indicative Masterplan Layout (dwg 09.99.a/JE July 2018, by JCR Planning) and a Candidate Site Supporting Statement (Aug 2018, by JCR Planning).
- 3.9 The Candidate Site Supporting Statement made clear, at paragraph 3.0.1, that the Indicative Masterplan Layout was for illustrative purposes and other design solutions for the site could also be reached. The Statement went on to propose, in paragraph 3.2.1, that the Candidate Site be allocated for a mixed use development, including up to 350 residential units. It is clear from this paragraph that the allocation of the entire area, within the red line as shown on the Location Plan, was proposed.
- 3.10 During the time which has elapsed since the submission of the candidate site questionnaire there have been a number of changes which should be noted
- The arrangement between Low Carbon and Parc Emlyn has ended.
 - The site area (questionnaire question 2) is now reduced slightly. Parc Emlyn held options on two areas of land: a site containing a collection of existing buildings in the south west corner, off Gors Ddu Road, and; the land coloured light blue on the Initial Masterplan (accompanying this representation) and labelled ‘Community Use’. Parc Emlyn no longer holds options on these areas.
 - Parc Emlyn supports the timing and rate of delivery of residential units as set out in the Deposit Plan, and withdraws the answer given in response to question 16 on the candidate site questionnaire.

4. SOUNDNESS TEST 2 – IS THE PLAN APPROPRIATE

- 4.1 The Welsh Government Development Plans Manual (Edition 3, March 2020) sets out at paragraph 6.26

Section 64(2) of the 2004 Act specifically provides that an LPA must not submit an LDP unless it considers the plan is ready for examination. This means that ‘unsound’ plans should not be submitted for examination. The LPA will need to demonstrate that the plan meets the three tests of soundness set out in Table 27.

- 4.2 Parc Emlyn submit that the Deposit Plan as currently set out does not meet the second test of soundness. The Deposit Plan is not appropriate because
- the rationale behind the plan’s policy has not been demonstrated
 - real alternatives have not been properly considered

- it is not logical and reasonable.

This is explained in more detail below.

- 4.3 The rationale behind the plan's policy has not been demonstrated, specifically, the Council has not demonstrated why only part of the area should be allocated.
- 4.4 The Site Assessment Table 2023 presents in summary format the results of the candidate site assessment process. Emlyn Brickworks appears on page 44, where under the comments column it says, 'There are concerns regarding the deliverability of the whole site, and so it is considered appropriate to allocate part of the site for mixed use.'
- 4.5 More detail is to be found in the Site Allocation Assessments (Cluster 3) document (Feb 2023). The pages are not numbered. The assessment of Emlyn Brickworks starts on the 191st page. At the end of the 195th page there is an 'Additional Comments' section at the end of Stage 2b of the assessment. In these comments it says, 'Given that the site has been previously allocated with only a small portion of the previous allocation being developed, it is considered more realistic that a smaller area of the site is carried forward into the revised LDP which would be more manageable to develop.' During the Stage 2b assessment, at questions 28 and 29, the Council has scored the site negatively in response to the questions on deliverability, viability and timing.
- 4.6 Although not explicitly mentioned in the Assessment, by proposing to allocate only part of the site the Council also reduce the number of homes it expects the allocation to deliver during the plan period, and it presumes they will be delivered in the final third of the period. It is not unreasonable to see how this approach is more robust within the overall housing delivery strategy the Council must set out. Many other parties will seek, for various reasons, to argue the Council strategy is unsound because it has been unrealistic in the rate of delivery it has set out for various sites. Seen from this perspective and with little information to support an expectation of a higher or earlier rate of housing delivery, the approach of the Council is not unreasonable. Indeed, Parc Emlyn support the position the Council has set out in respect of the rate and timing of housing delivery for the site (PrC3MU1), in draft policy HOM1: Housing Allocations, and consider it to be sound.
- 4.7 The above offers the only apparent explanation behind the decision by the Council to propose the allocation of just part of the site. However, it is not an adequate explanation, in that it is not necessary to reduce the amount of land allocated in order to arrive at the rate and timing of delivery set down in draft policy HOM1. The comments set out in the Site Assessment explain and justify the approach taken to the rate and timing of delivery but not the reduction in the area to be allocated. Furthermore, nor does it explain why the policy defined settlement boundary line should also be changed, from that shown in the current Local Plan, to the much reduced area shown in the Deposit Plan.

- 4.8 The Council has not properly considered real alternatives, specifically, the Council did not properly consider allocating the whole site. The Site Assessment does not report there having been any consideration of the option to maintain the extent of the site allocation area (as per the current Local Plan) but with the rate and timing of delivery as given in draft policy HOM1.
- 4.9 The Council approach has not been logical and reasonable, specifically, the choice about which part of Emlyn Brickworks to include in the allocation is flawed. The extent of the area put forward by the Council is based largely on the Indicative Master Plan submitted with the candidate site questionnaire in 2018, and partly on the final alignment of the spur link road. However, the Candidate Site Supporting Statement emphasised, at paragraph 3.0.1, that the Indicative Master Plan was submitted for illustrative purposes only and other design solutions for the site could also be reached. Its' use by the Council to identify a smaller area of land to allocate for development is therefore directly contrary to the purpose for which the Plan was produced.
- 4.10 Neither the Indicative Master Plan nor the Candidate Site Supporting Statement suggest the area shown in greater detail on the Indicative Master Plan would be or should be the first area to be brought forward for development. Part of the site was shown in greater detail only for the purpose of providing an indication of the proposed density of the scheme.
- 4.11 The Indicative Master Plan should not have been used by the Council to identify a smaller area of land for allocation. The Indicative Master Plan does not provide either a logical or reasonable basis for identifying the location and extent of the area of land proposed for allocation in the Deposit Plan.
- 4.12 The Council therefore has not demonstrated that there is a rationale behind allocating only part of the site put forward in the candidate site submission, it has not shown it properly considered real alternatives and there is no logical or reasonable basis for the location and extent of the area is has proposed to allocate.

5. HOW THE PLAN CAN BE MADE SOUND

- 5.1 It is submitted that the Deposit Plan can be made sound with only a minor modification to the details of the Plan. Within the structure of the Examination process, this is formally to propose a site allocation but in practice all that is proposed is that the remainder of the land under the ownership and control of Parc Emlyn be included. This would be given effect by amending the Proposal Map so the extent of the allocation and or the policy defined settlement boundary line match the extent of the coloured areas on the accompanying Initial Masterplan.
- 5.2 The rationale for making this change rests primarily on the principle that the best judge of which part of the site (south of the spur link road) to first bring

forward for development, is the developer, with that judgement mediated through the development management process (including pre-application consultation and engagement). This will allow for the proper planning of the area as a whole to be considered, so that a comprehensive approach can be taken that is not constrained by an arbitrary sub-division of the site.

- 5.3 This point is illustrated by the Tetra Tech Site Review, into the contamination and stability of the ground across the site. Figure 3 from the Review, the Site Constraints Plan, shows for example those parts of the site not suitable for development until residual risks are further managed by investigation or treatment. This information needs to be reviewed in the context of further studies into, for example, ecology, public open space requirements and how to create a sustainable urban drainage solution. As a result, the costs of developing this area might marry with objectives for creating new green infrastructure across the site, and suggest some or all of that area be provided as green and public open space. At this stage, it is too early to say. Allocating the whole site will allow for such issues to be investigated, debated and decided in a comprehensive way. This is far more likely to be conducive to the proper planning of the site.

The planning merits of allocating the whole site

- 5.4 The Site Assessment Table 2023 provides a summary of the analysis by the Council of each candidate site submitted to them for consideration. Full detail of the site assessment for Emlyn Brickworks is provided in the Site Allocation Assessments (Cluster 3) document (Feb 2023) ('the site assessment'). The approach take by the Council to the assessments is explained in the Site Assessment Methodology (Sep 2022) ('the SAM').
- 5.5 The assessment considered all the land Parc Emlyn seeks to have included, against stages 1, 2a and 2b. At the end of stage 2b the Council decided to take forward only part of the site for assessment against stage 3.
- 5.6 In passing stage 1, the whole of the candidate site as submitted was found to be compatible against the location of future growth presented in the Preferred Strategy (highlighted green: see site assessment question 1 and section 3 of the SAM).
- 5.7 In passing stage 2a, the whole of the candidate site as submitted was found to have no site based major constraints, that is
- it could accommodate five or more dwellings (see site assessment question 2 and paragraphs 4.7 and 4.8 of the SAM)
 - it is, in this case, directly related to an identified settlement in Tiers 1-3 of the LDP Preferred Strategy, meaning, it is physically, functionally, and visually linked to the settlement (see site assessment question 3 and paragraphs 4.9 and 4.10 of the SAM)

- it is not located within a flood risk zone (see site assessment question 4 and paragraphs 4.13 and 4.14 of the SAM)
- it is not located within or immediately adjacent to any sites for importance to nature conservation (see site assessment question 5 and paragraph 4.15 of the SAM), and
- it is not located within or immediately adjacent to any Scheduled Monuments (see site assessment question 3 and paragraph 4.17 of the SAM).

5.8 In passing most of stage 2b, the whole of the candidate site as submitted was found to have no other site constraints, that is

- development will be in accordance with general planning principles (see site assessment question 7 and paragraphs 19 and 20 of the SAM)
- development will not have a detrimental impact on the character and setting of the settlement or its features (see site assessment question 8 and paragraph 4.21 of the SAM)
- development will involve the re-use of suitable previously developed land (see site assessment question 9 and paragraph 4.22 of the SAM)
- development will be accessible from the existing public highway, from an available access point with adequate visibility, with no significant highway issues having been identified (see site assessment questions 10, 11 and 12 and paragraphs 4.23 to 4.26 of the SAM)
- development will have suitable access to public transport and active travel routes (see site assessment question 13 and paragraph 4.27 of the SAM)
- development will have access to green space, leisure and recreational facilities within a reasonable distance (see site assessment question 14 and paragraph 4.28 of the SAM)
- development will be in close proximity to employment and retail provision and to other services and facilities (see site assessment question 15 and paragraph 4.29 of the SAM)
- development will be within a reasonable distance to education facilities (see site assessment question 16 and paragraph 4.30 of the SAM)
- development will not be within or adjacent to a mineral buffer zone (see site assessment question 17 and paragraph 4.31 of the SAM)
- development will be within a Mineral Safeguarding Zone, for sandstone, but the mineral resource is largely sterilised because it is within 200m of sensitive development (housing) (see site assessment question 17,

paragraph 4.32 of the SAM and the top of the 194th page of the site assessment)

- development will not be within or immediately adjacent to an Air Quality Management Area (see site assessment question 19 and paragraphs 4.33 and 4.34 of the SAM)
- development will be within an area which geologically contains high carbon soil but it does not contain boglands and mitigative policies set out within the Deposit Plan are expected to address the potentially negative effects (see site assessment question 20, paragraph 4.35 of the SAM and the 196th page of the site assessment)
- development will not include any high quality agricultural land (see site assessment question 21 and paragraph 4.36 of the SAM)
- development will not be located within or immediately adjacent to any Regionally Important Geological and Geomorphological Sites (see site assessment question 22 and paragraph 4.37 of the SAM)
- delivery of the development is not impacted by an elevated risk of flooding (see site assessment question 23 and paragraphs 4.39 to 4.40 of the SAM)
- development will have access to an available water connection (see site assessment question Q24 and paragraph 4.41 of the SAM)
- development will not be within or adjacent to a phosphate sensitive (SAC) catchment (see site assessment question 25 and paragraphs 4.42 to 4.45 of the SAM)
- development has connections to other infrastructure (see site assessment question 26 and paragraph 4.47 of the SAM), and
- development will not have a detrimental impact on Welsh Language (see site assessment question 27 and paragraphs 4.47 and 4.48 of the SAM).

5.9 Further to the reference above to peat deposits, the Tetra Tech Site Review confirmed the British Geological Survey shows peat deposits are expected within and adjacent to the site area. Ground investigations have confirmed peat deposits underly part of the site (see geology section of Executive Summary to the Tetra Tech Site Review). The survey mapping indicates peat deposits lie across the northern and western areas of the site (see section 3.1.1 on page 9 of the Review, and the map on appendix page 78 to Appendix B (Groundsure Report), of the Review). This deposit straddles both the areas allocated and not allocated for development by the Council. It can therefore be concluded that neither the presence or absence of peat deposits has been or should be a factor in the inclusion or exclusion of land when deciding the extent of the allocation at Emlyn Brickworks.

- 5.10 In conclusion therefore, the stage 2b assessment found no site constraints which would make its development undeliverable and it is a reasonable site both for inclusion with the development limits of the settlement and for allocation for development (see paragraphs 4.2 and 2.1 of the SAM). This is also consistent with the allocation of the whole site for development in the current Local Plan.
- 5.11 The Council explain in the comments at the end of stage 2b why the whole site did not go forward to stage 3. In summary, it was because of what they felt to be a lack of progress. However, this explanation does not give due weight to the planning history of the site
- substantial earthworks have taken place to ready the site for development
 - Phase I, while only a modest scheme, was built out
 - the responsibility for the time taken to reach a conclusion on the application on Phase II, for 70 units, does not rest solely with the landowner, and
 - the spur link road has been completed and opened, providing new means of access to the majority of the site.
- 5.12 Investor confidence to move forward with proposals for the remainder of the site will be boosted when the planning permission is issued for Phase II.
- 5.13 Council comments at the end of the stage 2b assessment also refer to potential remediation costs. Remediation work was undertaken as part of the earthworks operation. While some further work will be needed to demonstrate compliance with current standards, there are no grounds to suggest this merits the special mention given in the Council comments. The Tetra Tech Site Review provides a comprehensive assessment of work undertaken to date and sets out conclusions and recommendations for further work (in section 11, starting on page 52). The scope of that work is not unusual and is no impediment to the delivery of a comprehensive scheme of development across the site.
- 5.14 The Welsh Government Development Plans Manual (Edition 3, March 2020) sets out at paragraph 5.20 (page 99) that the use of settlement boundaries on the Proposals Map should make a clear distinction for plan users as to where development is acceptable or not. The land Parc Emlyn wish to see 'added' to the draft allocation is presently allocated for development in the current Local Plan. This in itself speaks to the site being judged acceptable, on its planning merits, for development. The assessment of the planning merits of the site against the issues set out in stages 1, 2a and 2b of the site assessment methodology shows that it continues to be an appropriate and acceptable location for development. The assessment undertaken by the Council did not identify any site constraints which would suggest otherwise and nor has the Council otherwise identified any grounds for seeking to constrain growth at this location (see paragraph 5.21 of the Manual). Independent of any matters

relating the extent of the land to be allocated for development, there are no grounds to justify a more tightly drawn settlement boundary at this location, as the Council has proposed, and instead the boundary should remain as shown in the current Local Plan.

6. SUSTAINABILITY APPRAISAL

- 6.1 Only that part of the site the Council proposed to allocate was subject to Stage 3, the integrated sustainability appraisal. The following therefore looks at the remainder of the area Parc Emlyn wish to see included in the allocation, and considers it against the criteria in stage 3 of the site assessment (integrated sustainability appraisal and habitat regulation assessment).
- 6.2 The Council produced an ‘Integrated Sustainability Appraisal – guide for promoters of sites for development (Feb 2023) (‘the ISA Guide’). This asks those promoting sites for allocation to complete a site assessment proforma (at section 3). This proforma sets out exactly the same questions asked in stages 1, 2a and 2b of the candidate site assessment. The whole of the candidate site at Emlyn Brickworks, including the part Parc Emlyn want added to the allocation, has already been assessed, by the Council, against those questions in the Site Allocation Assessments (Cluster 3) document (Feb 2023). The latter provides the answers to the questions the proforma asks, and therefore there is no need to repeat the exercise.
- 6.3 The proforma in the ISA Guide shows which of the questions, in the site assessment, cross-reference to the Integrated Sustainability Appraisal Objectives (‘ISA Objectives’). The Council gave a ‘score’ (‘the ISA score’) against each ISA Objective, based on the response to the site assessment question. On the basis the answers to the questions in site assessment stages 1, 2a and 2b are the same for the whole site as they are for the part the Council went on to assess against the ISA Objectives, the ISA scores for the whole site will be the same as for the part the Council has already scored. Again, therefore, there is no need to repeat the exercise. The findings will be as set out in the Site Allocation Assessments (Cluster 3) document (Feb 2023).

7. CONCLUSIONS

- 7.1 The Deposit Plan as currently set out does not meet the second test of soundness. This is because
- the rationale behind the decision to allocate only part of the candidate site has not been demonstrated
 - real alternatives, namely allocating the whole site, with the same rate and timing of delivery, has not been properly considered, and

- the way in which the candidate site has been divided, so only part is advanced for allocation, is not logical or reasonable because it is based on information which was not produced with the intention of informing such a decision.

- 7.2 The Plan can be made sound by including all of the land owned by Parc Emlyn, as shown on the Initial Masterplan, within the site allocation. This will allow for a comprehensive approach to the proper planning of the area to be dealt with through the development management process, without undue constraint. In addition, or alternatively, the settlement boundary line should be retained as shown in the current Local Plan.
- 7.3 The whole of the candidate site has been assessed as deliverable and the part of the site not included in the proposed allocation has the same ISA Score as the part that is. There is no reason not to allocate the whole site, and indeed, given its planning merits, there is good reason to do so.
- 7.4 Parc Emlyn support the position of the Council with regard to the number and timing of the delivery of new homes during the Plan period. Parc Emlyn are not seeking to suggest the site will deliver more homes than the Council have forecast during the plan period. Notwithstanding that, given the planning merits of the whole site, no harm would arise if the site were to prove capable of delivering more homes than is forecast during the plan period, or if it started delivering homes sooner than anticipated. If it did not, it is not unreasonable to expect the undeveloped portion would come forward during the following plan period.
- 7.5 The Candidate Site Assessment concluded that, ‘The site presents an opportunity to regenerate or redevelop a previously developed site’. That opportunity remains and should continue to be made available.
- 7.6 The Examination Inspector is therefore respectfully requested to find the Deposit Plan is not sound as currently presented and to invite the Council to seek to make a minor modification by amending, as described above, the site allocation and settlement boundary line on the Proposals Map.

Representations prepared by

Adrian Thompson MRTPI

Director, Lightwater TPC

14 April 2023

