

Our Ref: 1045.a

Date: 28th March 2023

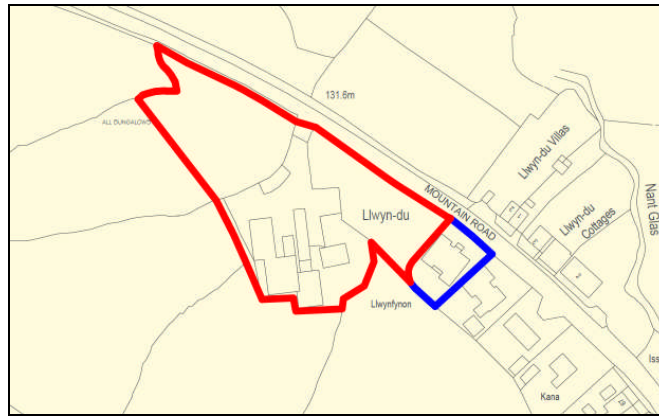
Forward Planning Manager,
Place and Sustainability,
Department of Sustainability and Infrastructure,
Carmarthenshire County Council
3 Spilman Street,
Carmarthen
SA31 1LE

Dear Sir/Madam,

Carmarthenshire Local Development Plan 2018-2033 – 2nd Deposit
Representation on behalf of Mr Mrs S Matthews
Land off Mountain Road, Glanaman

Further to the publication of the above document, we have been asked by our Client to review its contents, policies and proposals and advise them of any aspects we believe would unreasonably affect their aspirations and interests. In doing so, we consider that the proposed provisions of **Policy SD1** are of particular interest to our Client. As a result, we offer the following for the Authority's consideration, and Inspector's in due course.

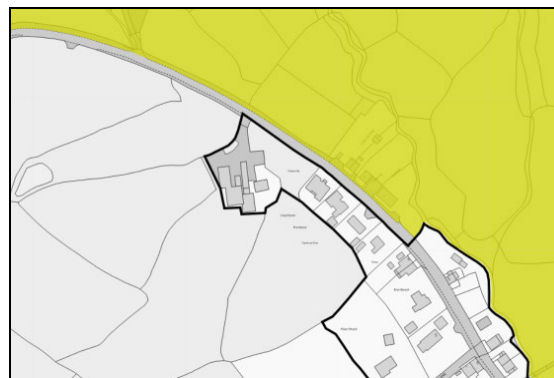
Our client made a formal Candidate Site Submission in August 2018, which was referenced **SR/064/004**, seeking the inclusion of the land within the defined development limits of Glanaman as part of the Replacement Local Development Plan. The Candidate Site (edged red below) included two small parcels of land, set either side an existing residential property with its associated hardstandings and outbuildings, being the core of an associated smallholding.



Plan A

All boundaries of the Candidate Site were and continue to be well defined, with the public highway (Mountain Road) then running along its north eastern boundary. The site then continues to be within walking distance to the range of community facilities and local services the adjoining settlement has to offer, as well as well serviced bus stops that provide access to those services and facilities in the wider growth area.

Following its due consideration, the Council then included within the development limits the south eastern two thirds of the land in question in its 1st Deposit LDP, published in January 2020 (Plan B).



Plan B

In explaining its decision to exclude part of the site, the Council advised in its 'Site Assessment Table' (January 2020) as follows:

"Part of the site is considered appropriate for small scale rounding off, and the development limits will be drawn to incorporate this element. In terms of the remainder of the site, it is

considered that there is sufficient and more suitable land available for development within the settlement to accommodate the housing need.”

What was apparent therefore from the above was that the Council had assessed the Candidate Site on the basis of its potential as a residential allocation – i.e. a site capable of accommodating 5 units. Those sites put forward for less than this number by means of seeking an amendment to the defined development limits therefore largely failed a number of the stages of the assessment by default.

As part of the current consultation process into the 2nd Deposit LDP, the Council have again published a “Site Assessment Table” (2023), which provides details of the Council’s analysis of each received Candidate Site submission. We note that our Client’s land was considered as part of this process and as a result the Council concluded as follows:

“Part of the site is considered appropriate for small scale rounding off, and the development limits will be drawn to incorporate this element. In terms of the remainder of the site, it is considered that there is sufficient and more suitable land available for development within the settlement to accommodate the housing need.”

As can be seen, the process of assessment of our Client’s land by the Council has remained unchanged, and whilst we support the inclusion of part of the land within the development limits defined by Policy SD1, we consider the exclusion of the remainder of the site to be an erroneous decision by the Council, as well as being an inconsistent approach taken by it in the assessment of such sites. We therefore consider that the LDP is “unsound” and should be changed, as it fails to meet the tests for “soundness”.

Specifically, we consider the approach of assessment taken by the Authority has been inconsistent in terms of (a) other policy approaches taken by the Deposit LDP and (b) in relation to other examples that were successfully included within defined development limits of the 2nd Deposit LDP. We consider therefore that the whole of the land edged red in Plan A, should be included within the defined development limits for Glanamman under the provision of Policy SD1 of the Carmarthenshire Local Development Plan.

This formal representation letter supplements the following documents which comprise a complete submission to the 2nd Deposit LDP Consultation stage:

- Completed 2nd Deposit LDP Representation Form
- Copy of Candidate Site Supporting Letter (August 2018)
- Copy of Candidate Site Location and Layout Plan (August 2018)

Response to Council's Reasons for Non-Allocation of Site

Consistency with Other Policies of the Deposit LDP

The Council has provided no specific indication or guidance on how it has determined and defined development limits within the 2nd Deposit LDP. It has therefore been difficult to ascertain why some sites have been successfully included and others haven't, which is discussed further below. 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.

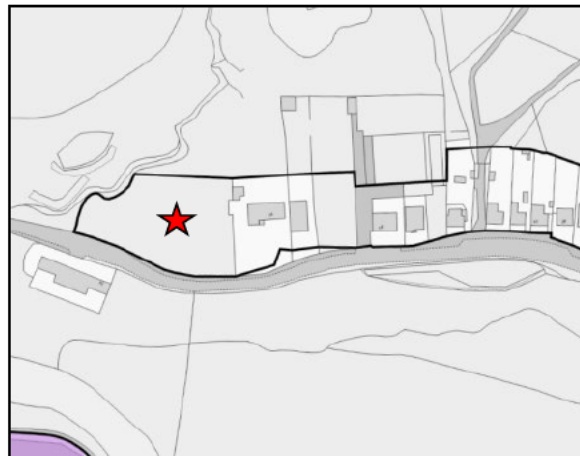
It is logical therefore that the same assessment criteria should be utilised in assessing whether or not a candidate site would make an acceptable addition to existing development limits (A separate representation with regards to Policy SD1 has been made on this basis).

Taking all our Client's land into consideration, together with the actual 'on-the-ground' physical attributes of adjoining and nearby land and its use, it is clear that it would adhere to the second criteria listed above and so should in turn have been included within the defined development limits of Glanamán. Its exclusion would be inconsistent with the provisions of Policy HOM3 and indeed decisions taken by the Council with regard to other sites within the Plan area. As a result and on this basis alone, the Plan as it currently stands is unsound.

Consistency with Other Settlement Limits

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 Glanamán, the Council has been found to be inconsistent.

The plans below are an extract of the 2nd Deposit LDP Proposals Maps for two areas (indicated by the red star) at the eastern and western edges of Garnant.



Plan C



Plan D

As can be seen, although both areas are defined by strong boundary features, neither have a developed form. In addition, the area shown on Plan C, the land on the opposite side of the adjoining public highway from the site is predominantly undeveloped and the area of 'white land' in question also does not have any planning history, but its inclusion within the limits will extend the existing form of the settlement in a western 'ribbon-like' manner.

It should be noted that we do not object to the form of alteration to the development limits as referred to above, as it secures a varied form of available housing development opportunities for a community. However, their inclusion are in direct contrast and inconsistency to the Council's decision to exclude our Client's land as a whole from the development limits. Combined with our Client's land representing a logical rounding-off of the respective area of

the settlement, the exclusion of it would represent a clear inconsistency in approach taken by the Council, resulting in the Plan as it stands being unsound.

In conclusion, this Representation to the 2nd Deposit Draft of the Revised LDP has sought to examine the Council's reasons for non-inclusion of a Candidate Site within the defined development limits. It has successfully addressed the reason put forward by the Council for its exclusion and highlighted that its continued exclusion would represent a dangerous inconsistency.

We therefore respectfully request that this Representation be given careful examination, and consequently the land in question be included within the defined development limits as part of the Carmarthenshire Local Development Plan to ensure that the document passes all the relevant tests of soundness.

Kind regards

A solid black rectangular box used to redact the signature of Jason D Evans.

Jason D Evans

Director