

Our Ref.: 1597.a

Date: 28<sup>th</sup> March 2023

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

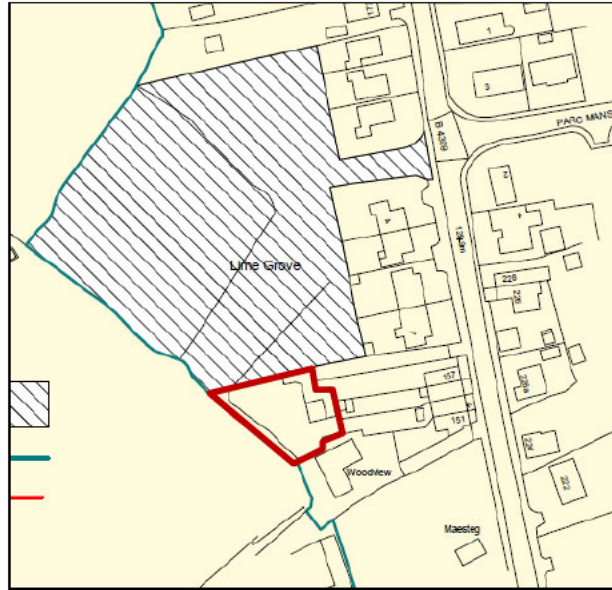
Dear Sir/Madam,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft**  
**Objection on Behalf of Mr E Rees**  
**Land rear of 153 Heol Meinciau, Pontyates**

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 Council's consideration, and Inspector's in due course.

**The Site and Adjoining Area**

This submission relates to the land edged red on Plan A below.



**Plan A**

The land relates to a small element of rear curtilage associated with 153 Heol Meinciau, pictured below and circled red in Photograph 1.



**Photograph 1**



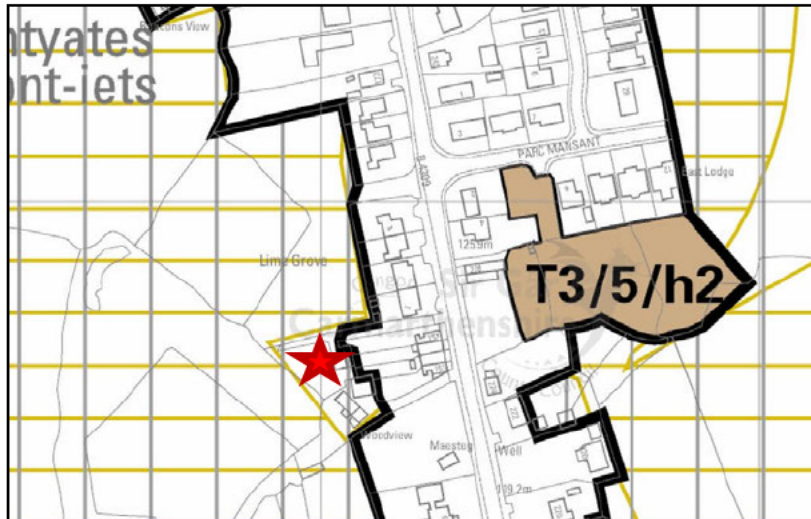
**Photograph 2**

As can be seen, the land in question consists of a managed area of grass and provides rear access to an outbuilding serving No. 153. Access to the land is gained directly off Heol Meinciau to the east, in between two further residential properties.

Immediately to the south and east of the site are existing residential properties and their associated curtilages. To the west, as can be seen in Photograph 2 is a mature woodland, with the land to the north then benefiting from an extant planning permission for 21 residential properties. The land edged red on Plan A is therefore completely encapsulated by strongly defined boundaries and established land uses.

A short distance to the south then is the core of the settlement of Pontyates, with its associated community facilities and local services and bus stops, all of which are within walking distance of the site subject of this submission.

Under the provisions of the current adopted Carmarthenshire Local Development Plan, the site (indicated by a red star in Plan B) adjoins, but remains outside of the currently defined development limits, as illustrated by Plan B.

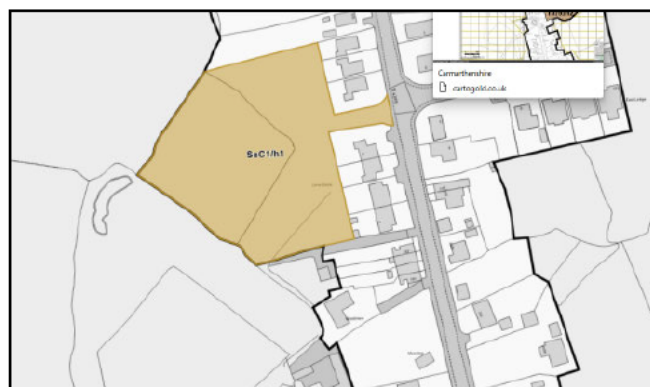


**Plan B**

Having reviewed the evidence base for the current adopted LDP, it is not apparent as to why the site edged red in Plan A was excluded from the defined development limits.

**2<sup>nd</sup> Deposit Local Development Plan**

Although no submission was made by or on behalf of our Client at the Candidate Stage for the inclusion of the land edged red in Plan A within the defined development limits for Pontyates, we understand that the Council undertook a comprehensive review of the development limits of all settlements within the County as part of its preparation of the 2<sup>nd</sup> Deposit LDP. Notwithstanding this assessment, from reviewing the Proposals Map for the 2<sup>nd</sup> Deposit LDP, the situation with regards to the land in question appears to be unchanged, as illustrated in Plan C below.



**Plan C**

Notwithstanding the above, the land directly to the south and north of the site edged red on Plan A, is now proposed for inclusion within the development limits and allocated for housing development respectively.

#### *Consistency with Other Policies of the 2<sup>nd</sup> Deposit LDP*

The Council 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 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.

Taking the land edged red in Plan A into consideration, together with the actual 'on-the-ground' physical attributes of the two residential properties in question, 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 logically been included within the defined development limits of Pontyates. Its exclusion would be inconsistent with the assessment provisions of Policy HOM3 and indeed decisions taken by the Authority with regard to other sites within the Plan area in terms of Policy SD1. As a result and on this basis alone, the Plan as it currently stands is unsound.

#### *Consistency with Other Development Limits*

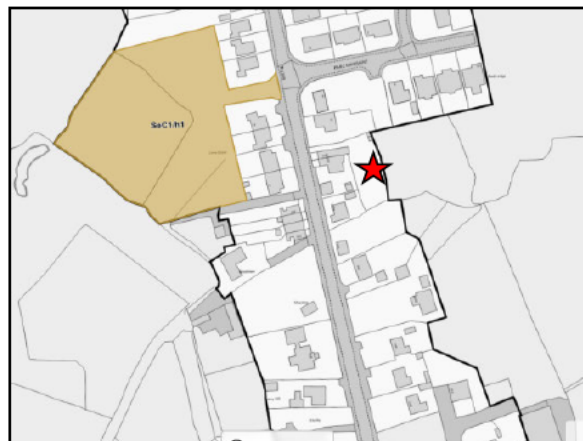
Consistency in approach and application is critical in order for the planning system to be both effective and credible to all its users. Without it, the system itself becomes unsound and in the case of the determination of the development limits for Pontyates and other settlements, the Council has been found to be inconsistent.



The plans below are an extract of the 2<sup>nd</sup> Deposit LDP Proposals Maps for two areas (indicated by the red star) in the settlement of Garnant and Pontyates, where the entirety of a residential curtilage has been included within Development Limits, despite its shape and size.



**Plan C  
(Garnant)**



**Plan D  
(Pontyates)**

There are of course numerous examples of similar situations throughout the Proposals Map and so it is unclear why the land edged red on Plan A has been excluded from the development limits for Pontyates, particularly when adjoining land to its north and south has. The exclusion of it would therefore 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 2<sup>nd</sup> Deposit Draft of the Revised LDP has sought to assess the suitability of the inclusion of the land edged red on Plan A, based on the current

provisions of the Plan and its decisions taken with respect to similar circumstances elsewhere. In conclusions, it has successfully 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.

Yours sincerely,

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

**Jason D Evans**

**Director**