

Our Ref.: 1062.c

Date: 30<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**  
**Representation on Behalf of Davies Richards Developments**  
**Land off Colonel Road, Ammanford**

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 HOM1** 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.

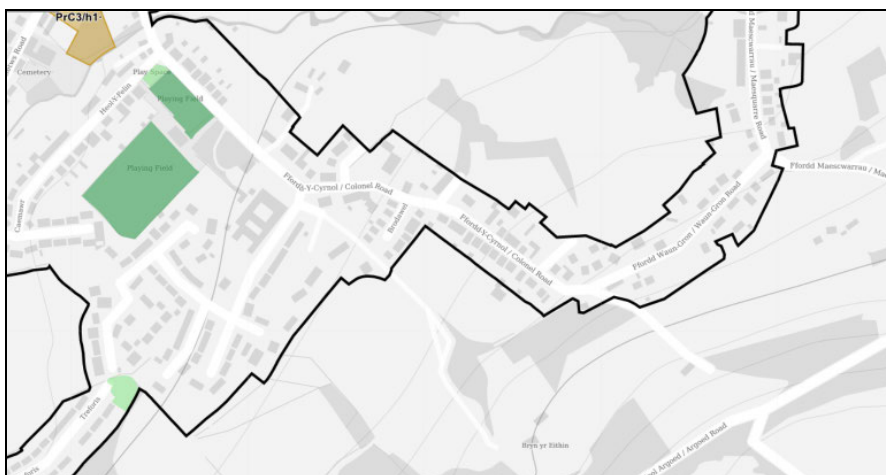
Our clients made a formal Candidate Site Submission in August 2018, which was referenced **SR/004/022**, seeking the allocation of their land for future residential development within the defined settlement limits of Ammanford/Betws as part of the Replacement Local Development Plan. The Candidate Site (edged red below) comprised of a single existing enclosure and an associated residential property with all boundaries clearly and well defined.



**Plan A**

As a result of this, existing residential development and their associated curtilages are positioned directly to the north east, north west and south east. The site is also within close proximity to the range of community facilities and local services the settlement and greater urban area of Ammanford has to offer.

Following its due consideration, the Council then excluded the Site from the proposed development limits for Ammanford/Betws in its 1<sup>st</sup> Deposit LDP, published in January 2020 (Plan B).



**Plan B**

In explaining its decision to exclude the site and not allocate it for residential purposes, the Council advised in its 'Site Assessment Table' (January 2020) as follows:

*“There is sufficient and more suitable land available for residential development within the town to accommodate its housing need.”*

At the time of publication of the 1<sup>st</sup> Deposit LDP therefore, the only reason presented by the Council for the exclusion of the site from the development limits and its non-allocation for residential development, was on the basis that the Council considered there to be sufficient alternative sites within the town to accommodate the housing need.

As part of the current consultation process into the 2<sup>nd</sup> 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:

*“There is sufficient and more suitable land available for residential development within the town to accommodate its housing need. Access to the site would likely necessitate the demolition of property likely to cause some disturbance to neighbouring properties. It is unclear whether suitable visibility splays can be achieved.”*

As can be seen, the initial rationale presented by the Council mirrors that at the 1<sup>st</sup> Deposit LDP stage (housing land supply), but now the Council have questioned the means of access to the site. Both reasons presented are puzzling, particularly the latter as the Candidate Site submissions include a full Transport Statement that included new access provisions to serve the site, in-line with the highway authority’s requirements. The proposed arrangement is reproduced in Plan C below.



**Plan C**

It should of course be further noted that as a result of changes being brought in by the Welsh Government later this year, the required level of visibility for new access will be reduced even further. Unfortunately, it appears that in their assessment of the Candidate Site, the Council have failed to take this and the submitted information into consideration. As a result of this and the reasons above, we consider the sites exclusion to be an illogical and erroneous decision by the Council and consider therefore that the LDP as it stands is “unsound” and fails to meet the required Tests of Soundness.

Specifically, we consider that alternative allocations within the settlement and wider Principal Centre are neither appropriate nor deliverable. We consider therefore that the land edged red in Plan A, should be allocated for residential development under the provision of Policy HOM1 of the Carmarthenshire Local Development Plan.

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

- Completed Deposit LDP Representation Form
- Completed Integrated Sustainability Appraisal form
- Copy of Candidate Site Submission Report (August 2018)
- Ecological Appraisal
- Transport Statement

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

### *Sufficient Residential Land Allocated Within Settlement*

Part of the Council's rationale for the non-allocation of the site for residential development is on the basis that it considers that alternative allocations within Ammanford/Betws and the wider Principal Centre it forms part of will deliver sufficient housing for the town during the Plan period.

Under the current provision of the Deposit LDP, the Principal Centre has a range of proposed residential allocations. Having undertaken a comprehensive review of the proposed allocations put forward by the 2<sup>nd</sup> Deposit LDP for the Principal Centre in question, it has been identified that a number have significant questions over their ability to be delivered within the Plan period, including the following:

<b>Ref. No.</b>	<b>Site Name</b>	<b>Units</b>
PrC3/h4	Tirychen Farm	150
PrC3/h36	Betws Colliery	60
PrC3/h14	Nantydderwen, Tumble	33
PrC3/h22	Adj. to Pant y Blodau, Penygroes	79
PrC3/h2	Heol Gelynen, Brynamman	8

**Table 1**

As a result of the above – all of which have been allocated in previous development plans - separate objections to their inclusion with the LDP have been made. This is due to the fact that to continue to allocate such sites for residential development results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.

In conclusion, this Representation to the 2<sup>nd</sup> Deposit Draft of the Revised LDP has sought to examine the Council's reasons for non-allocation of a Candidate Site. It has successfully addressed the reasons put forward by the Authority for its exclusion and has highlighted that currently proposed allocations are undeliverable.

We therefore respectfully request that this Representation be given careful examination, and consequently the land in question be allocated for residential development as part of the

Carmarthenshire Local Development Plan to ensure that the document passes all the relevant tests of soundness.

Yours sincerely,



**Jason D Evans**

**Director**