

Our Ref.: 1062.a

Date: 30th 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 Blaenau Road, Llandybie

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** and **Policy SG1** 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.

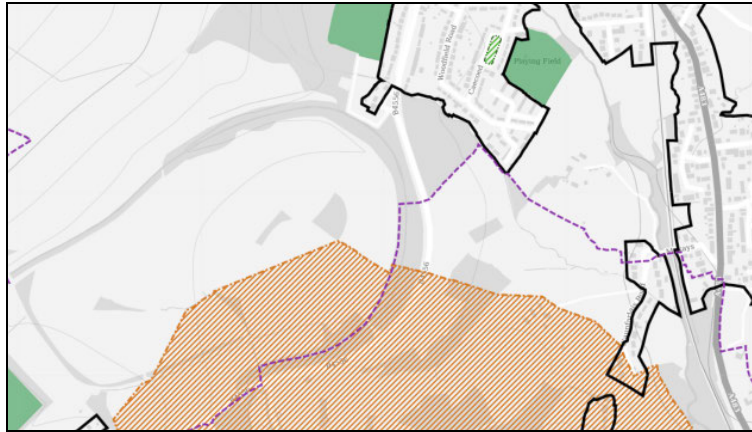
Our clients made a formal Strategic Candidate Site Submission in August 2018, which was referenced **SR/082/012**, seeking the allocation of their land (edged red on Plan A) for a mix of residential development, areas of formal and informal amenity space, together with an area preserved for ecological interests, as part of the Replacement Local Development Plan.



Plan A

The site would serve the settlement of Llandybie and the surrounding area of the associated Principal Centre (Cluster 3). The Strategic Candidate Site comprised of a series of existing enclosures, with vehicular access gained directly off Blaneau Road, which runs along its northern boundary. From a locational perspective, the site is also within close proximity to the range of community facilities and local services the adjoining settlement and surrounding area has to offer, as well as being in close proximity to a number of well served bus stops that provide access to those services and facilities found in the wider region.

Following its due consideration, the Council then excluded the Site from the proposed development limits for Llandybie in its 1st 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:

"The site has been identified as being at high risk of flooding in the Revised Carmarthenshire LDP SFCA. There are other more suitable sites available which can meet the housing needs of the village."

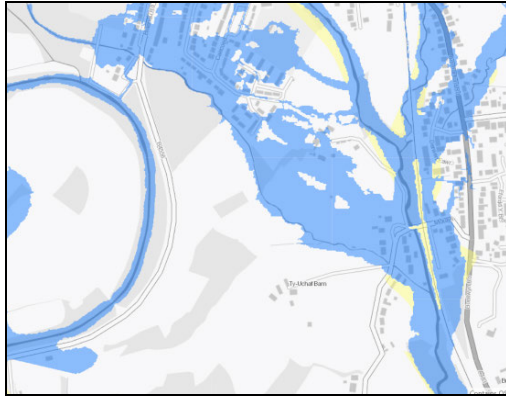
The above decision was somewhat puzzling and in our view erroneous, as (a) the SFCA was wrong to exclude the whole of the site from consideration (the area of the Site within the flood zone was minimal) and that (b) alternative allocations within the settlement and wider growth area were clearly neither appropriate nor deliverable.

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:

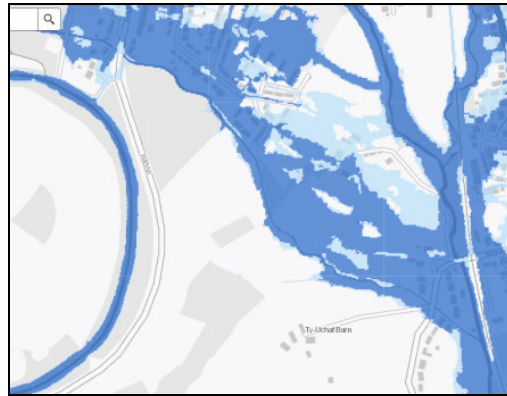
"The site has been identified as being at high risk of flooding in the Revised Carmarthenshire LDP SFCA (2019). There are other more suitable sites available which can met the housing needs of the village."

As can be seen, the rationale presented by the Council replicates that at the 1st Deposit LDP stage (flood risk and housing land supply), although when examined fully, they appear both illogical and erroneous.

Plan C and Plan D below provide an indication under the provisions of *Technical Note 15: Development and Flood Risk* of the considered current and emerging risk of flooding in relation to the Site.



Plan C
(Development Advice Maps)



Plan D
Flood Maps for Planning)

As can be seen, less than 5% of the total area of the Site is considered to be at risk of flooding. Furthermore, as illustrated on the submitted Indicative Layout Plan, none of this area is required to deliver the mix of development put forward for the Site and so the Council have undertaken an incomplete and clearly erroneous assessment of the Alternative Strategic Site. As a result of this and the reasons below, 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 (see below). We consider therefore that the land edged red in Plan A, should be allocated for residential development under the provision of **Policy HOM1** and **Policy SG1** 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 Deposit LDP Representation Form
- Completed Integrated Sustainability Appraisal form
- Copy of Candidate Site Submission Report (August 2018)
- Ecological Appraisal
- Transport Statement
- Indicative Master Plan

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 Llandybie 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 2nd 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:

Ref. No.	Site Name	Units
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

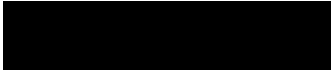
Table 1

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 2nd 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 and that the Council's assessment of the Alternative Strategic Site was flawed.

We therefore respectfully request that this Representation be given careful examination, and consequently the land in question be allocated for mixed use development 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