

Our Ref.: 1021.a

Date: 5<sup>th</sup> April 2023

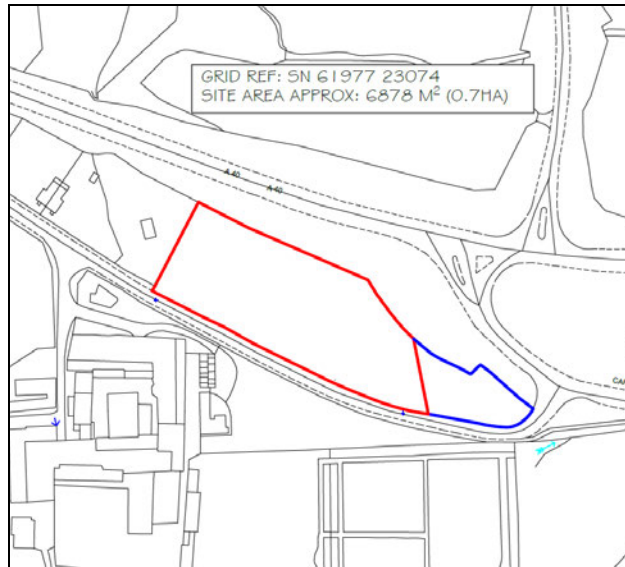
Forward Planning Manager,  
Place and Sustainability,  
Department of Sustainability and Infrastructure,  
Carmarthenshire County Council  
3 Spilman Street,  
Carmarthen  
SA31 1LE

Dear Sir/Madam,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft**  
**Objection on Behalf of Mr M Jones**  
**Land adjoining Red Cottages, Llandeilo**

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.

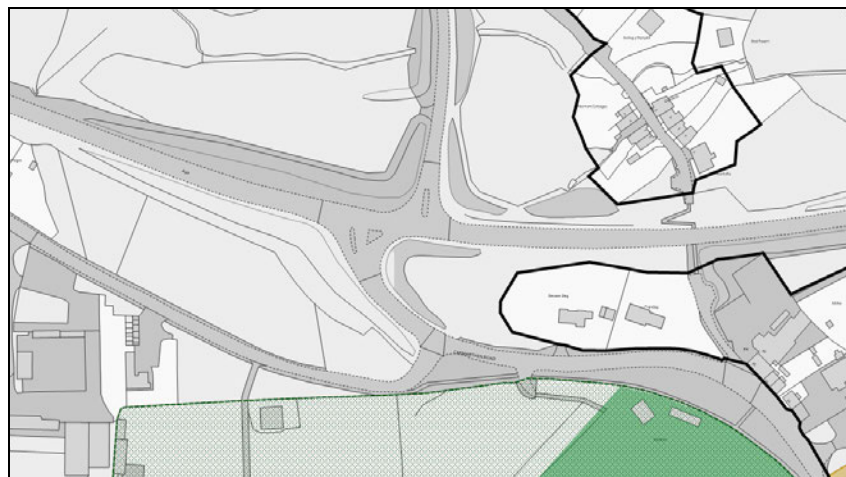
Our clients made a formal Candidate Site Submission in August 2018, which was referenced **SR/080/002**, seeking the allocation of their and adjoining land for future residential development within the defined settlement limits of Llandeilo as part of the Replacement Local Development Plan. The Candidate Site is edged red below in Plan A.



**Plan A**

The Candidate Site comprised of a single enclosure, with its south western boundary fronting onto the adjoining public highway, from which access to it was gained. Its remaining boundaries were as equally well defined through a combination of existing woodland belts and residential properties.

Following its due consideration, the Council then excluded the Site from the proposed development limits for Ffairfach 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:

*“Development would lead to an illogical extension of the urban form. The Site will remain outside of limits. There is sufficient residential land allocated in the settlement. The position with DCWW WWTW at Ffairfach is a consideration.”*

At the time of publication of the 1<sup>st</sup> Deposit LDP therefore, the Council presented three separate reasons for justifying its exclusion, although no further detail or explanation than the above statement was provided.

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:

*“Development would lead to an illogical extension of the urban form. The Site will remain outside of limits. There is sufficient residential land allocated in the settlement. The position with DCWW WWTW at Ffairfach is a consideration.”*

As can be seen, the rationale of the Council for the exclusion of the Site as an allocation in the LDP has remained the same. This is somewhat puzzling and illogical and for the reasons set out below, puts the soundness of the Plan into question.

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 therefore 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)

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

#### *Sufficient Residential Land Allocated Within Settlement*

Under the provisions of the 2<sup>nd</sup> Deposit LDP, Llandeilo in conjunction with Ffairfach and Rhosmaen is defined as a Service Centre, representing the largest and most sustainable settlement in Cluster 5 of the Settlement Framework. Despite this, and the fact that the Council’s objective through the Plan is to channel most development to these settlements,

the current 2<sup>nd</sup> Deposit LDP has only allocated land for the provision of 27 new homes during the Plan period for the Service Centre. To therefore suggest that there is 'sufficient residential land' within the settlement to meet its community's needs and satisfy the strategic policies of the Plan is incredulous and for the Council's proposals to remain unchanged would result in the Plan being 'unsound'.

In turn, the Service Centre then forms part of a group of settlements defined as Cluster 5 in the Settlement Framework, with the table below providing an indication of the proposed allocations in the 2<sup>nd</sup> Deposit LDP for the cluster.

Ref. No.	Site Name	Units
SeC15/h1	Land to north of Dan y Crug, Llandovery	61
SeC15/h2	Land adjacent to Bryndeilog, Tywi Avenue, Llandovery	8
SeC16/h1	Llandeilo Northern Quarter, Llandeilo	27
SeC17/h1	Land opp. Llangadog C.P School, Llangadog	16
SeC17/h3	Ger yr Ysgol, Llangadog	21
SuV49/h1	Ael y Mynydd, Llanfynydd	13
SuV51/h1	Opp. Village Hall, Cwmifor	

**Table 1**

The above provides a worrying picture with regard to housing supply in the Cluster in question. Despite being the largest and most sustainable Service Centre of Cluster 5, Llandeilo/Rhosmaen/Ffairfach has a far lower level than the smaller settlement of Llandovery and less than half the number allocated for Llangadog, despite the settlement being half the size of Llandeilo.

The above is even more worrying when the deliverability, or the ability to deliver the assigned number of units of some of the above allocations are in serious question (SeC17/h1 and SuV51/h1), as well as some sites despite being allocated for over 30 years, still having not delivered as single unit (SeC15/h1)

As a result of the above, separate objections have been made in relation to a number of the aforementioned allocations and it is therefore important that alternative more deliverable sites should be identified, to ensure the Plan can be regarded as being 'sound' in targeting new housing development at the most sustainable location.

*Development would lead to an unacceptable extension of the Urban Form.*

The second reason given by the Authority for not allocating the Candidate Site was on the basis that in its view it would "... lead to an illogical extension fo the urban form."

As the accompanying Candidate Site Supporting Statement highlights, the Candidate Site is in fact well related to the existing settlement of Llandeilo. This is best appreciated from an aerial photograph (see below), which illustrates the close proximity of the site (edged red) to existing residential and commercial development.



**Photograph 1**

It is in fact almost surrounded by existing non-agricultural land uses and so forms a logical extension and addition to the wider urban form. From an accessibility perspective, the site is within short walking distance of a number of the Town's community facilities and local services, as well as well served bus stops. The allocation of the Candidate Site would not only represent a logical addition to the existing urban form, but would also represent a sustainable form of development.

*The position with DCWW WWTW at Ffairfach is a consideration."*

The final reasoning given by the Council then relates to the waste treatment plant at Ffairfach, although it has not included this statement in any of its other response to its assessment of Candidate Sites in the Service Centre. No explanation to date has been given as to why.

Notwithstanding the above, we understand that provided all foul water leaving a development from Llandeilo meets the phosphate regulations of Natural Resource Wales, the WWTW in question will be able to accommodate such additional flows. The Site subject of this submission is capable of providing such on-site infrastructure and the proposed 5

units, due to its size. This ratio has been based on other worked up examples and so the third reason cited by the Council for excluding the Site is both illogical and erroneous

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,

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

**Jason D Evans**

**Director**