

Our Ref.: 1062.b

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

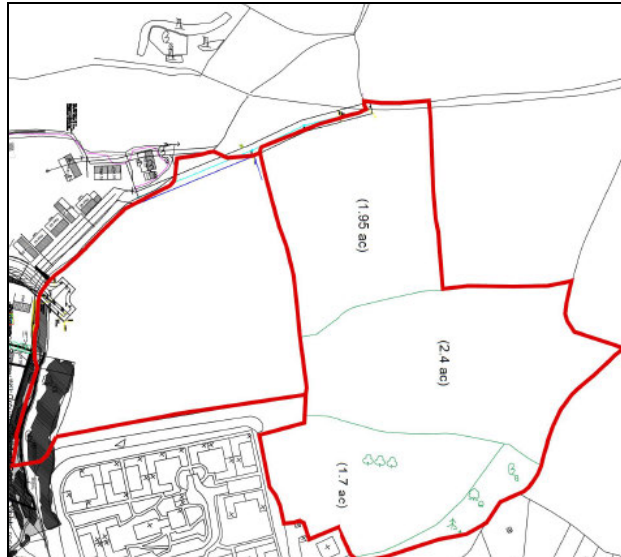
Forward Planning Manager,  
Place and Sustainability,  
Department of Sustainability and Infrastructure,  
Carmarthenshire County Council  
3 Spilman Street,  
Carmarthen  
SA31 1LE

Dear Sir/Madam,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft**  
**Representation on Behalf of Davies Richards Developments**  
**Land adjoining Parc Pencrug, 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 Client made a formal Candidate Site Submission in August 2018, which was referenced **SR/080/013**, seeking the allocation of their land for residential development within the defined settlement limits of Llandeilo as part of the Replacement Local Development Plan. The Candidate Site (edged red below) comprised of several parcels of land, with the eastern half of the Site in the ownership of Carmarthenshire County Council and the western half in the ownership of our Clients.



**Plan A**

As illustrated above, the Candidate Site comprised of three enclosures, each of low-moderate value in terms agriculture, and with all being well defined by a mix of hedgerows and stock proof fencing. The westernmost enclosure (owned by the Council) is steeply sloping, with the remaining two enclosures being more level in nature. The site as a whole is then bounded by the existing urban form of Llandeilo to its south and west, with further enclosures to its east and the Llandeilo Northern Bypass located a short distance to the north. Due to the site's location, it is within a short walk from a wide range of community facilities and local services found within the Town.

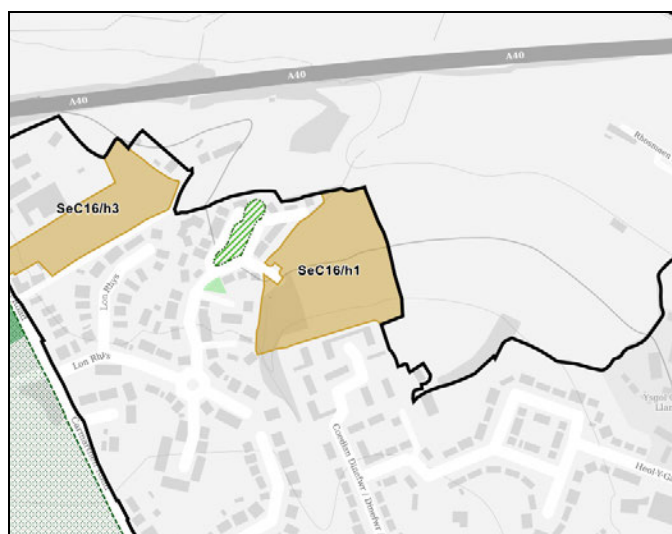
It should be noted, that consultation has already begun on a comprehensive scheme for the development of the majority of the Site by Pobl Housing Group, based on the site layout drawing reproduced below, delivering 88 new units.



**Plan B**

The proposed development includes provision for addressing the phosphate regulations published by Natural Resources Wales with regards to the disposal of foul water, ensuring that the scheme is fully deliverable.

Notwithstanding the above, following its due consideration of submissions made at the Candidate Site Stage, the Council then allocated part of the Candidate Site for residential development in its 1<sup>st</sup> Deposit LDP, published in January 2020 (Plan C).



**Plan C**

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

*"There are concerns over the deliverability of the site. The site has been allocated for housing for a number of years and has not been developed. Allocation to be reduced in size to the area covered by candidate site SR/080/005 with reference SeC16/h1; the remainder to be excluded from development limits."*

At the time of publication of the 1<sup>st</sup> Deposit LDP therefore, the Council's concerns related to concerns over the deliverability of the much larger allocation the Candidate Site formed part of, and so reduced it to the area of land owned by the Council.

Notwithstanding the above decision, and for reasons well known, the Council then revisited its 1<sup>st</sup> Deposit LDP in preparation of a second version. As part of the preparation process for the 2<sup>nd</sup> Deposit LDP, the Council have published a “Site Assessment Table” (2023), which provides details of the Council's analysis of each received Candidate Site submission, including that subject of this objection. We note that our Clients land was considered as part of this process and as a result the Council concluded as follows:

*“There are concerns over the deliverability of the site. The site has been allocated for housing for a number of years and has not been developed. Allocation to be reduced in size to the area covered by candidate site SR/080/005 with reference SeC16/h1; the remainder to be excluded from development limits.”*

As can be seen, the rationale of the Council for the exclusion of our Clients land from the allocation in the LDP has remained the same. However, it is somewhat illogical and puzzling for the Council to be citing ‘deliverability’ as the justification for its decision. In fact, and in contrast, the Council have failed to sell or develop its own element of the Candidate Site for a considerable time now, due to unreasonable land value aspirations and construction-cost challenges due to its topography. However – as can be seen from the current scheme in preparation for the wider site – when the land is looked at in combination, a scheme for the larger area then becomes deliverable. As a result, without our Clients land, the proposed allocation will be undeliverable and fail to provide the number of new housing units it is expected to do so, resulting in turn in the Plan being ‘unsound’.

The Council's decision is therefore not only illogical, but also appears to be a dangerous and erroneous decision to make, particularly in light of the level of under provision of deliverable housing sites within the Plan. As a result of this decision we therefore consider that the LDP as it stands is “unsound” and fails to meet the required Tests of Soundness. As detailed, this is particularly worrying, in view of the lack of deliverable allocations within the Cluster and wider Plan area.

We consider therefore that all 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)
- Copy of Transport Statement

We therefore respectfully request that this Representation be given careful examination, and consequently the land in question be allocated for residential development in its entirety 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**