

Our Ref.: 1121.a

Date: 4th April 2023

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

Dear Forward Planning,

Carmarthenshire Local Development Plan 2018-2033 – Second Deposit Draft
Representation on Behalf of Mr M. Thomas
Land part of Cruglwyd Farm, Capel Iwan

We are instructed by Mr M. Thomas to make a formal representation with regards to the above land and the Second Deposit Draft of the Carmarthenshire Local Development Plan. Our clients made a formal Candidate Site Submission in August 2018, which was referenced **SR/019/008**, seeking the inclusion of their land within the development limits of Capel Iwan as part of the Replacement Local Development Plan.

The Candidate Site comprises part of a field enclosure, being irregular in shape but shares a common boundary on two sides with detached dwellinghouses which fronts the main road running north to south through the village centre. The land benefits from an undeveloped gap set between existing bungalows and the farm buildings of Cruglwyd set just to the north of the field. Its extents are illustrated by the site edged in red at Figure 1 below.

The Council have published a “Site Assessment Table” (January 2023) which provides details of the Council’s analysis of each received Candidate Site submission, and in the case of our clients’ submission, reasons why the site was not selected for inclusion within the draft settlement limits of Capel Iwan as contained within the Deposit Draft.

We note that the submission successfully passed through all three Assessment Stages, being Stage 1 (site compatible against the location of future growth presented in the Preferred Strategy), Stage 2A (Initial Detailed Site Assessment), Stage 2b (Further Detailed Site Assessment) and Stage 3 (Sustainability Appraisal and Habitat Regulation Assessment) of the Council’s site assessment. It therefore crucially was **adjudged acceptable in all technical aspects** of formal assessment, but was only rejected at the final selection stage, with reasons for reported as follows:

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



Figure 1 – Google Earth image of Candidate Site at Capel Iwan

Our clients consider the LDP is “unsound” and should be changed, as it fails to meet the tests for “soundness”, in that the Plan “is not appropriate”, and “will not deliver”, as defined by the Planning Inspectorate’s LDP Examinations Procedural Guidance.

Specifically, our clients consider that the draft settlement limits for Capel Iwan, as defined under Policy SD1 “Settlement Limits”, **should be amended to include the land as edged in red upon the extract of the Proposals Map for Capel Iwan, as reproduced below in Figure 2.**

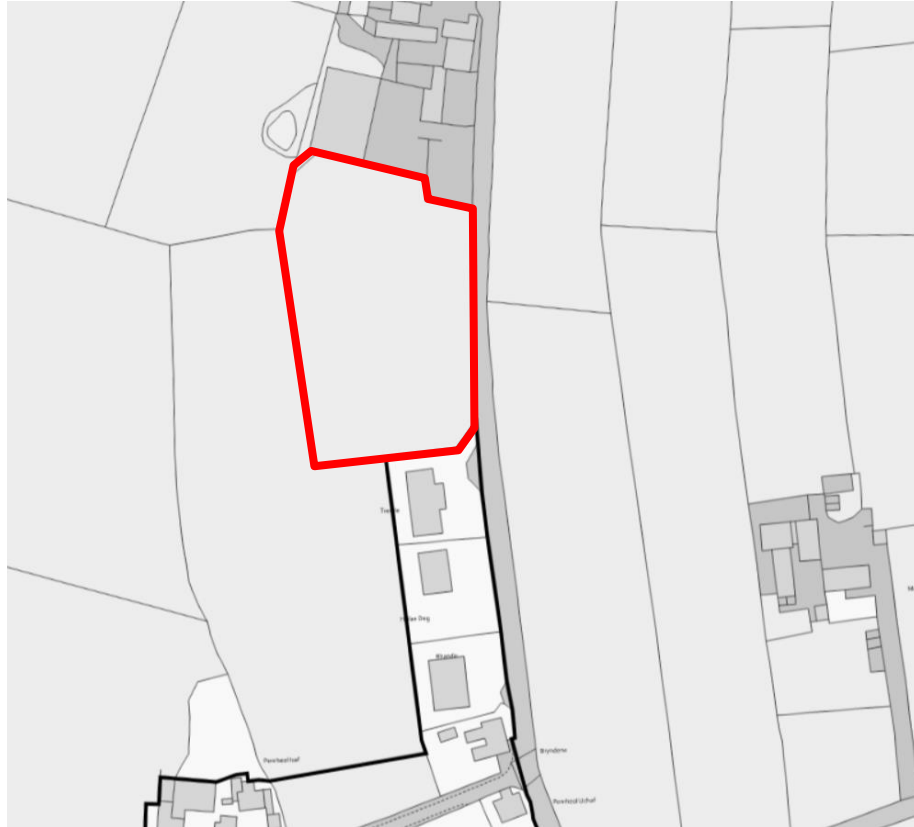


Figure 2 – Extent of Representation Site in Second Deposit Draft Plan in centre of Capel Iwan, and edged in red

This formal representation letter supplements the following documents which comprise a complete submission to the Second Deposit Draft Consultation stage:

- Completed Deposit LDP Representation Form

Response to Council's Reasons for Non-Inclusion of Site within Settlement Limits

1.0 Overall Housing Supply at Capel Iwan and Cluster 4 within Deposit Draft

- 1.1 The Council consider that the only reason for the Candidate Site south of Cruglwyd farmyard as not being included within the draft Plan as a Residential Allocation is that they believe that there are **sufficient residential sites allocated elsewhere in the settlement**. On this basis, it must be accepted that the form of the Candidate Site set as an infill opportunity between established properties which front the minor road running north from the village towards Newcastle Emlyn, together with the proposals to provide individual vehicular accesses onto that C class road is deemed acceptable, and in accord with the spatial form and character of the settlement.
- 1.2 The proposals under this Representation merely seek the addition of 3 residential units to the overall housing supply of Capel Iwan, which is regarded as a Tier 3

Sustainable Village, identified within the Teifi Valley Cluster within the draft LDP. Figure 3 below provides an extract of the indicative site layout plan for this Representation site. The proposals can provide for 3 bed detached bungalows, each served off their own accesses with traditional rear garden space.

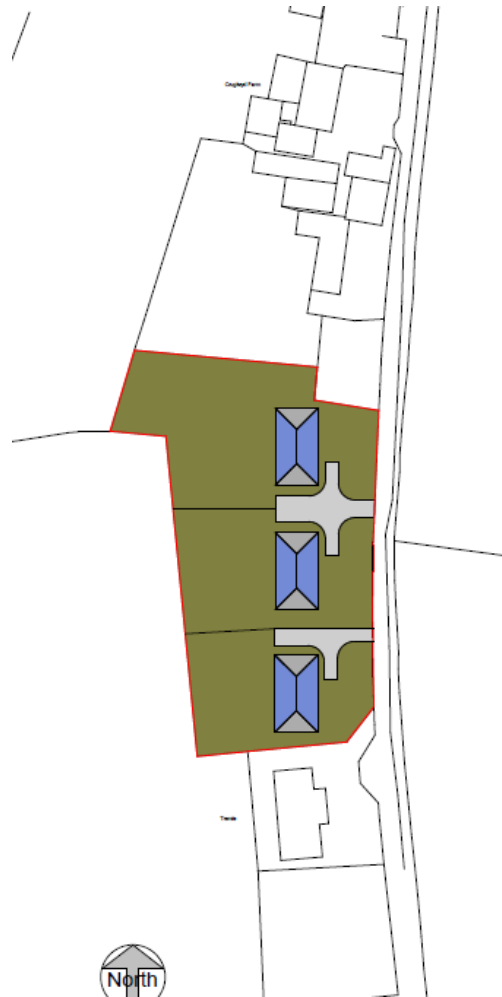


Figure 3 – Proposed Indicative Site Layout Plan for Representation Site

- 1.3 The Teifi Valley Cluster (Cluster 4) aims to provide an additional 218 residential units over the Plan period to 2033, with Capel Iwan (Settlement SuV38) providing only one allocated site at “Maes-y-Bryn” expected to provide only 6 units to that overall Cluster total (reproduced at Figure 4 below). We would submit in the first instance that the realignment of settlement limits to provide an additional 3 units will not lead to an over-supply of dwellinghouses within the Cluster, nor the defined Capel Iwan settlement supply.

Capel Iwan				
SuV38/h1	Maes y Bryn	6	Commuted Sum Contribution	Year 6 - 10

Figure 4 – Extract from Policy HOM1 for Capel Iwan

- 1.4 We have examined and researched sites which have been brought forward as Residential Allocations with the Deposit Draft. In Capel Iwan great emphasis within the Draft Plan has been placed upon the continued allocation of the above proposed housing site, which is still left allocated from the 2008-21 Local Development Plan. The above table indicates that the Council expect that site to be delivered to the market between LDP years 6-10, being 2023 to 2028. Therefore, given that it already benefits from being allocated in the current adopted LDP, the landowner or prospective purchase can seek planning permission in the knowledge of its acceptance in principle. Indeed, when questioned by the Council as part of their formal review of Allocated Sites from the 2014 adopted Plan they reported that *“The site was submitted as a candidate site and as such, the agent has provided evidence showing its viability.”*
- 1.5 However, we note that no application for planning permission has ever been submitted on the site, despite it appearing in an adopted LDP **for nine years**. The site made up part of the residential allocation SC7/h2 as reproduced at Figure 5 below.

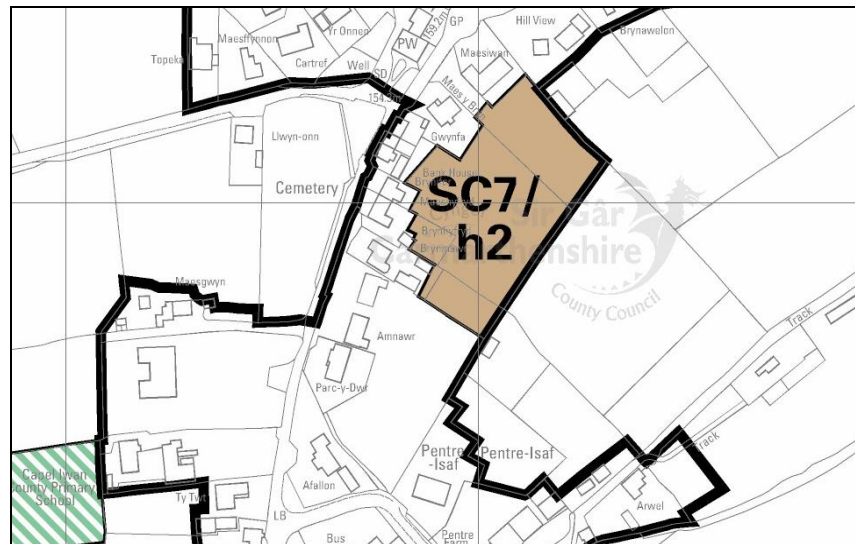


Figure 5 - Extract of Current LDP Proposal Map for Capel Iwan and Maes y Bryn Allocation

- 1.6 The site was also included with the Carmarthenshire Unitary Development Plan, adopted in 2006, and accordingly it has laid undeveloped and not subject of any planning application for a combined total of 17 years. **We will lodge separate formal representations seeking omission of this site, as it clearly is undeliverable, and the landowner has no intent of bringing it forward for development.**

2.0 Newcastle Emlyn

2.1 We have also examined Draft Allocations within the nearby town of Newcastle Emlyn, which is regarded as a Tier 2 Local Service Centre in the new LDP. Figure 6 below provides a snapshot of the three allocations in the town.

Newcastle Emlyn				
SeC12/h1	Trem y Ddol	17	1.7	Year 6 - 10 Year 11 - 15
SeC12/h2	Heol Dewi	14	0	Year 1 - 5
SeC12/h3	Land to r/o Dolcoed	20	3.4	Year 6 - 10 Year 11 - 15

Figure 6 – Newcastle Emlyn HOM1 Allocations

2.2 “Trem-Y-Ddol” allocated as SeC12/h1 for 17 dwellings. The site was allocated in the adopted 2014 Local Development Plan, and also Carmarthenshire Unitary Development Plan in 2006. Full Planning Permission was sought under application W/18258 for the development of “17 Dwellings, Site Layout and Access Road” in 2008. The application lay undetermined until 2022 – **a period of 15 years** – until it was finally refused due to the Applicants’ failure to commit to making a contribution towards Affordable Housing.

2.3 It is clear that to leave a planning application continue for so long without a decision is testament to a lack of desire and commitment by the landowner to implement a development upon the site, and accordingly it is plainly undeliverable as a future LDP allocation.

2.4 Finally, “Dolcoed” is allocated as Site SeC12/h3, apparently capable of providing 20 new homes, in two phases over the 10 years remaining of this new Replacement LDP. However, upon closer examination, it is revealed that there have been **no planning applications** made relating to the site subject of this allocation to date. This is despite the site being allocated in the *Carmarthenshire Local Development Plan (2014)* as allocation (T2/4/h1). After a period of 10 years, not a single dwelling has been proposed at this edge of town site, and yet the Council persist in awarding this inability to deliver by continuing the allocation in the new Replacement LDP.

2.5 We therefore highlight that a combined total of 37 dwellings upon two sites within 3 kilometres of our client’s site at Capel Iwan have remained stagnant and their continued allocation in a new LDP for a further 10 years is undeniably questionable. The Council should be seeking more deliverable small sites such as that promoted by our client at Cruglwyd Farm, which should be included in settlement limits in replacement of one if not all the above three sites.

In conclusion, this Representation to the Second Deposit Draft of the Revised LDP has sought to examine the Council's reasons for non-inclusion of a Candidate Site. Our clients have illustrated that their indicative proposals to construct 3 dwellinghouses will not appear at odds to the prevailing spatial pattern of development in Capel Iwan. The proposals will provide a short frontage of bungalows respectful to the character and setting of the locality.

We respectfully request that this Representation be given careful examination, and consequently the defined settlement limits of this part of Capel Iwan realigned to include the Representation Site, in a realigned settlement limits in the Proposals Map of the adopted Local Development Plan.

Yours sincerely,

R. A. Banks

Richard A. Banks
Director

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Cc clients