

Our Ref.: 1028.a

Date: 30<sup>th</sup> March 2023

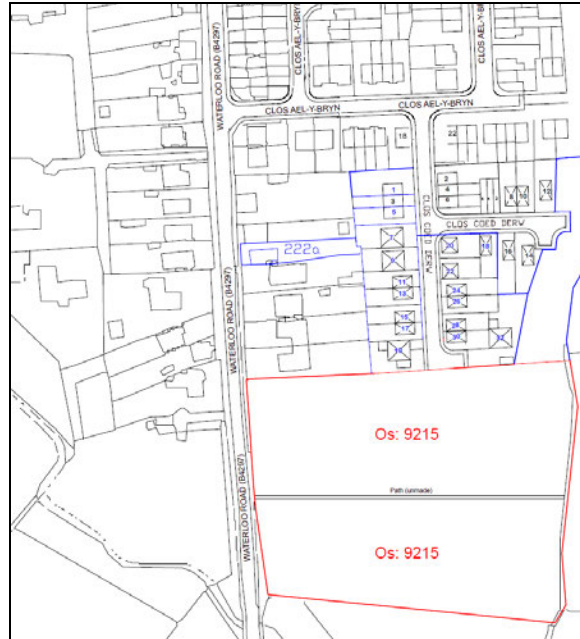
Forward Planning Manager,  
Place and Sustainability,  
Department of Sustainability and Infrastructure,  
Carmarthenshire County Council  
3 Spilman Street,  
Carmarthen  
SA31 1LE

Dear Sir/Madam,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft**  
**Representation on Behalf of D & A Rourke**  
**Land off Clos Coed Derw, Penygroes**

Further to the publication of the above document, we have been asked by our Clients 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 Clients. As a result, we offer the following for the Authority's consideration, and Inspector's in due course.

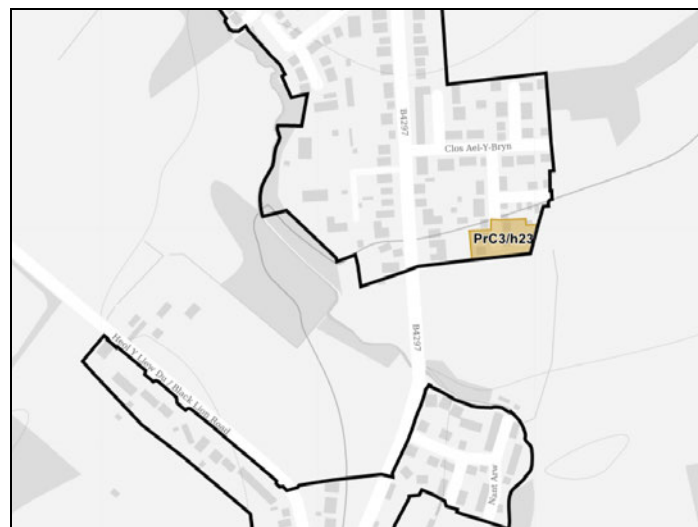
Our Clients made a formal Candidate Site Submission in August 2018, which was referenced **SR/132/008**, seeking the allocation of their land for future residential development within the defined settlement limits of Penygroes as part of the Replacement Local Development Plan. The Candidate Site (edged red below) comprised in effect of two existing enclosures, split by a stock proof fence and public footpath.



**Plan A**

It should be noted that the adjoining development was constructed by our Clients and so they have a recent proven development track record of delivering residential development in the area. The site is then within close proximity to the range of community facilities and local services the settlement has to offer.

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

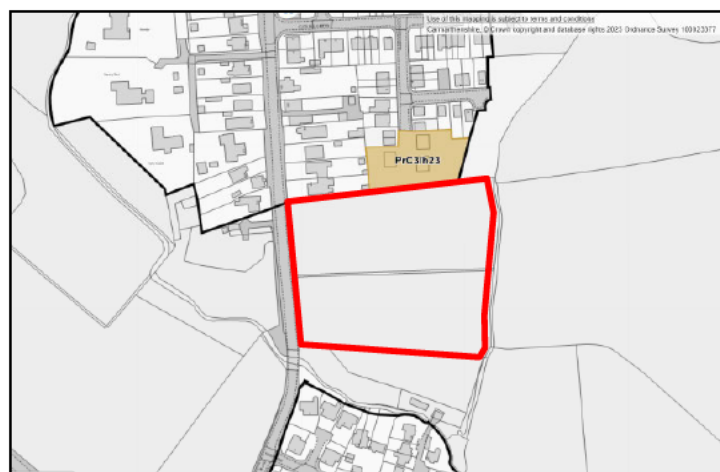
*“Inclusion of the site would contribute towards the coalescence of two villages contrary to general planning principles.”*

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 the development of the site would lead to the coalescence of two villages. However, as can be seen from Plan A and Plan B above, this is clearly not the case.

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 Clients land was considered as part of this process and as a result the Council concluded as follows:

*“Inclusion of the site would contribute towards the coalescence of two villages contrary to general planning principles. .”*

As can be seen, the initial rationale presented by the Council replicates that at the 1<sup>st</sup> Deposit LDP stage, but it is still considered that the reasoning given is illogical. Using the relevant extract of the 2<sup>nd</sup> Deposit Proposals Map and highlighting in red the Alternative Site, it can be seen that even with its development, a gap would remain between the southern most limits of Penygroes and the northernmost limits of Capel Hendre.



**Plan C**

It is quite clear therefore, that the development of the Alternative Site would not lead to the coalescence of two villages and as a result of this, 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. This is particularly worrying, in view of the lack of deliverable allocations within the Principal Tier of which the Alternative Site forms part of (please 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 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 Sustainability Appraisal form
- Copy of Candidate Site Submission Report (August 2018)
- Copy of Ecological Appraisal Report

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

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

We understand from discussions with Officers that 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 Penygroes and the wider Principal Centre it forms part of will deliver sufficient housing for the area 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:

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 Clients, 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 the reasons given are illogical and erroneous. In addition, it has been highlighted in conjunction with our submissions made by this Practice, that the currently proposed allocations put forward by the 2<sup>nd</sup> Deposit LDP 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**