

Our Ref.: 1070.b

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 Mr C Jenkins**  
**Land South of Tycroes Road, Tycroes**

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/159/006**, seeking the allocation of their land for residential development within the defined settlement limits of Tycroes as part of the Replacement Local Development Plan. The Candidate Site (edged red below) comprised in effect of two elements – a now complete residential development for 37 units in its western half and an undeveloped parcel of poor agricultural land in its eastern half.



**Plan A**

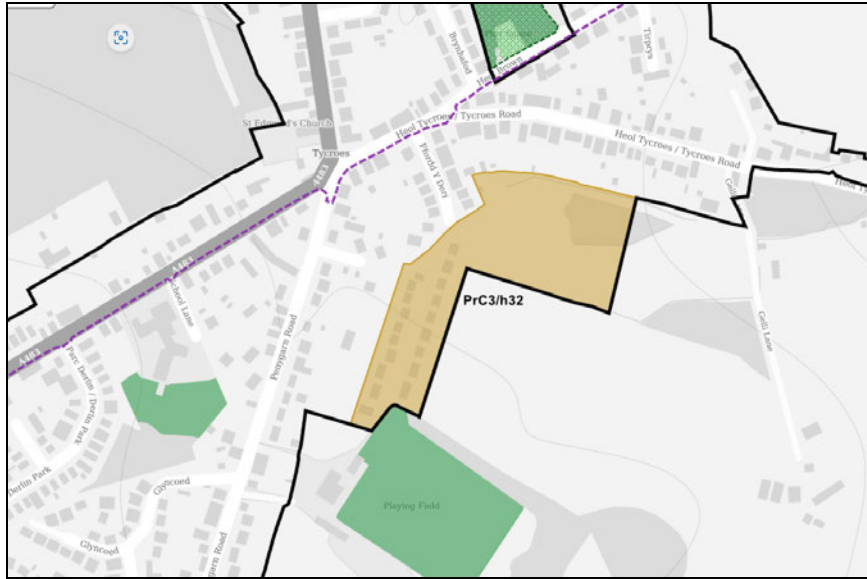
It should be noted that the adjoining development retained provision to provide access to the eastern half of the site, whilst access was also possible via the demolition of two properties to its north, as illustrated below.



**Plan B**

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 allocated the Candidate Site for residential development in its 1<sup>st</sup> Deposit LDP, published in January 2020 (Plan C).



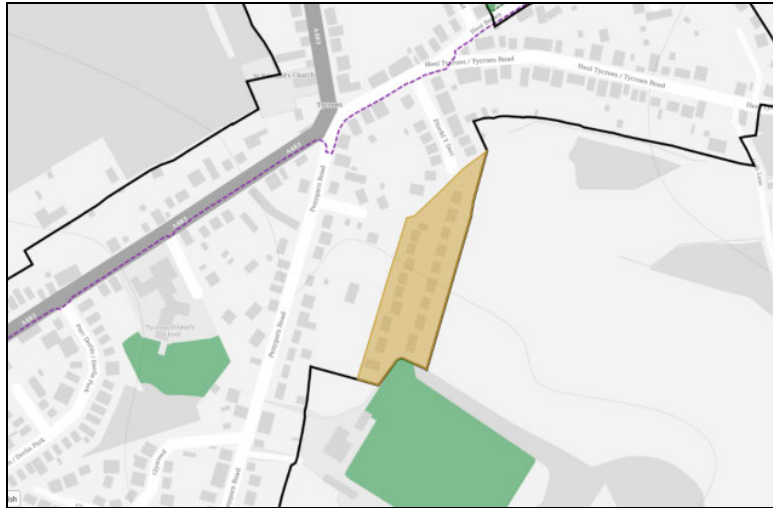
**Plan B**

Allocated under reference PrC3/h32, the allocation in its totality was expected to deliver a total of 62 units within the first 10 years of the Plan's lifetime.

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:

*"The site is to be partly allocated for residential development. Site reference is PrC3/h32."*

According then to the 2<sup>nd</sup> Deposit LDP Proposals Maps, now only the western half of the original Candidate Site is allocated for residential development (37 units) as illustrated in Plan D, despite construction on this element of the Site having been completed in 2022.



**Plan D**

Other than the text quoted above, the Council have provided no explanation for the removal of the eastern half of the Site from the allocation, or its reduction from 62 units to 37 units. They have raised no highway, ecological, utility or viability reason for its exclusion. This is 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 Principal Tier of which the Alternative Site forms part of (please see below).

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 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*

As detailed above, we are deeply concerned with the Council's decision to reduce the proposed housing allocation in question, and understand that this may be because the Council holds the view that alternative allocations within Tycroes and the wider Principal Centre it forms part of will deliver sufficient housing for the area during the Plan period. This is in our view wholly incorrect.

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:

<b>Ref. No.</b>	<b>Site Name</b>	<b>Units</b>
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 2<sup>nd</sup> Deposit Draft of the Revised LDP has sought to examine the Council's reasons for non-allocation of the whole of the Candidate Site. It has successfully addressed the reasons put forward by the Authority for its exclusion and has highlighted that the reason 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 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**