

Our Ref: 1027.a

Date: 6th 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 – 2nd Deposit
Representation on behalf of Mr A Pritchard
Land off Kings Road, Llandybie

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 SD1** 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/082/006, seeking the inclusion of the land within the defined development limits of Llandybie as part of the Replacement Local Development Plan. The Candidate Site centred mainly on a small agricultural paddock that fronted onto Kings Road, edged red on Plan A.



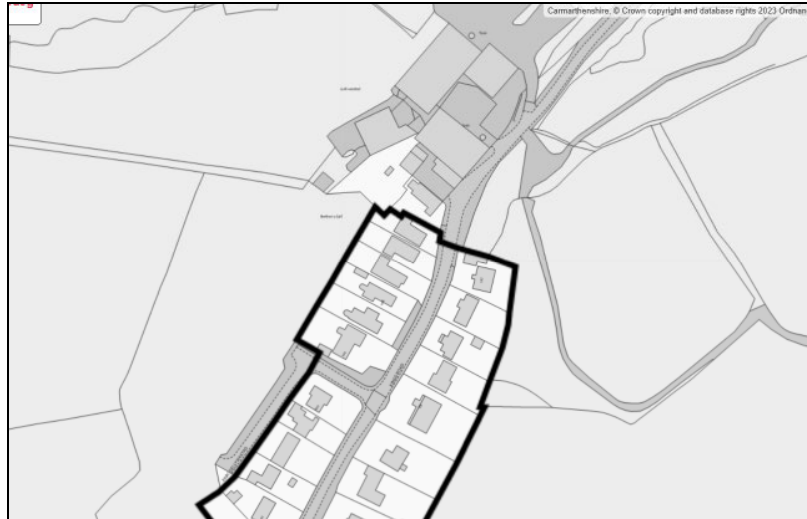
Plan A

Further agricultural enclosures are positioned to the east, but residential development is located directly to the land's south and on the opposite side of Kings Road to the west. The Site is also within walking distance to the range of community facilities and local services the settlement has to offer, as well as well serviced bus stops that provide access to those services and facilities in the wider growth area.

As part of the preparation of the 1st Deposit LDP, the Council then considered the submissions made and provided a summary of its assessment in its 'Site Assessment Table' (January 2020), which read as follows:

“Inclusion of the site would result in extending a ribbon pattern of development contrary to general planning principles.”

As a result, the proposed 1st Deposit LDP made no changes to the development limits in the environs of the Candidate Site to those forming part of the current adopted LDP, as illustrated by the Proposals Map extract below.



Plan B

As part of the current consultation process into the 2nd 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:

“The site cannot accommodate 5 or more dwellings. Inclusion of the site would result extending a ribbon pattern of development contrary to general planning principles.

As can be seen, the process of assessment of our Client’s land by the Council has remained unchanged, as has its exclusion from the development limits. We however consider the exclusion of the site to be an erroneous decision by the Council, as well as being an inconsistent approach taken by it in the assessment of such sites. We therefore consider that the LDP is “unsound” and should be changed, as it fails to meet the tests for “soundness”.

Specifically, we consider the approach of assessment taken by the Council has been inconsistent in terms of (a) other policy approaches taken by the Deposit LDP and (b) in relation to other examples that were successfully included within defined development limits of the 2nd Deposit LDP. We consider therefore that the whole of the land edged red in Plan A, should be included within the defined development limits for Llandybie under the provision of Policy SD1 of the Carmarthenshire Local Development Plan.

This formal representation letter supplements the following documents which comprise a complete submission to the 2nd Deposit LDP Consultation stage:

- Completed 2nd Deposit LDP Representation Form
- Copy of Candidate Site Supporting Letter (August 2018)
- Copy of Candidate Site Location and Layout Plan (August 2018)

Response to Council's Reasons for Non-Allocation of Site

Consistency with Other Policies of the Deposit LDP

The Council has provided no specific indication or guidance on how it has determined and defined development limits within the 2nd Deposit LDP. It has therefore been difficult to ascertain why some sites have been successfully included and others haven't, which is discussed further below. However, Policy HOM3 deals with small extensions to existing rural villages and so provides a useful series of criteria in determining where such extensions would be acceptable, namely the following:

- Minor infill or a small gap between the existing built form; or
- Logical extensions and/or rounding off of the development pattern that fits in with the character of the village form and landscape; or
- Conversion or the sub-division of large dwellings.

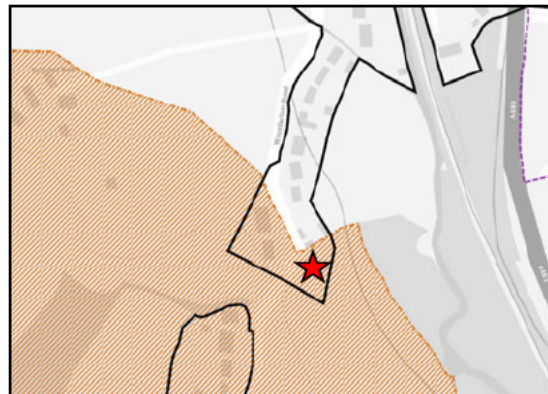
It is logical therefore that the same assessment criteria should be utilised in assessing whether or not a candidate site would make an acceptable addition to existing development limits (A separate representation with regards to Policy SD1 has been made on this basis).

Taking our Client's land into consideration, together with the actual 'on-the-ground' physical attributes of adjoining and nearby land and its use, it is clear that it would adhere to the second criteria listed above and so should in turn have been included within the defined development limits of Llandybie. Its exclusion would be inconsistent with the provisions of Policy HOM3 and indeed decisions taken by the Council with regard to other sites within the Plan area. As a result and on this basis alone, the Plan as it currently stands is unsound.

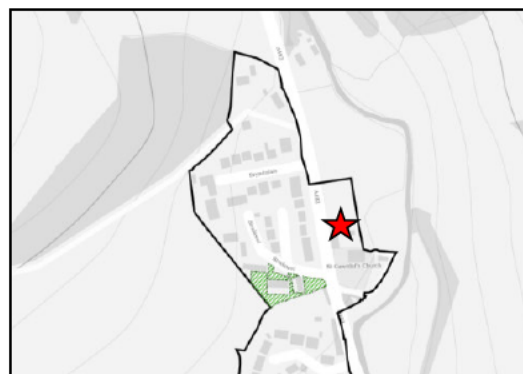
Consistency with Other Development Limits

Consistency in approach and application is critical in order for the planning system to be both effective and credible to all its users. Without it, the system itself becomes unsound and in the case of the determination of the development limits for Llandybie and other settlements, the Council has been found to be inconsistent.

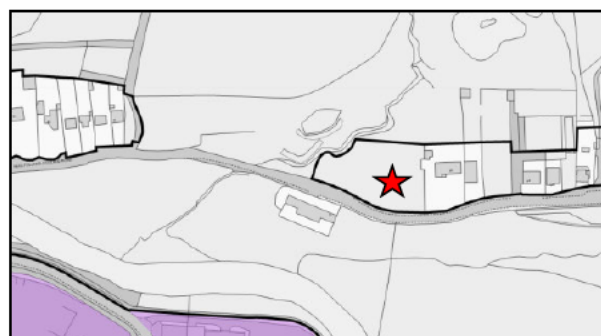
The plans below are an extract of the 2nd Deposit LDP Proposals Maps for two areas (indicated by the red star) in the settlement of Llandybie, Glanamman and Llanwrda.



Plan C
(Llandybie)



Plan D
(Llanwrda)



Plan E
(Glanamman)

In the case of the Llandybie example, two separate parcels of undeveloped land have been included within the defined development limits, that extend the existing form of the

settlement in a southern 'ribbon-like' manner, and the Garnant example follows a similar pattern. The Llanwrda example is then an element of an existing larger agricultural enclosure, with two of its boundaries therefore currently undefined and so extending the existing settlement's limits beyond existing boundaries.

It should be noted that we do not object to the form of alteration to the development limits as referred to above, as it secures a varied form of available housing development opportunities for a community. However, their inclusion is in direct contrast and inconsistency to the Council's decision to exclude our Client's land and the aforementioned existing properties from the development limits. Combined with our Client's land representing a logical rounding-off of the respective area of the settlement (particularly when the on-the-ground position is given full consideration), the exclusion of it would represent a clear inconsistency in approach taken by the Council, resulting in the Plan as it stands being unsound.

In conclusion, this Representation to the 2nd Deposit Draft of the Revised LDP has sought to examine the Council's reasons for non-inclusion of a Candidate Site within the defined development limits. It has successfully addressed the reason put forward by the Council for its exclusion and highlighted that its continued exclusion would represent a dangerous inconsistency.

We therefore respectfully request that this Representation be given careful examination, and consequently the land in question be included within the defined development limits as part of the Carmarthenshire Local Development Plan to ensure that the document passes all the relevant tests of soundness.

Kind regards

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

Jason D Evans

Director