

Our Ref.: 1066.a

Date: 4th April 2023

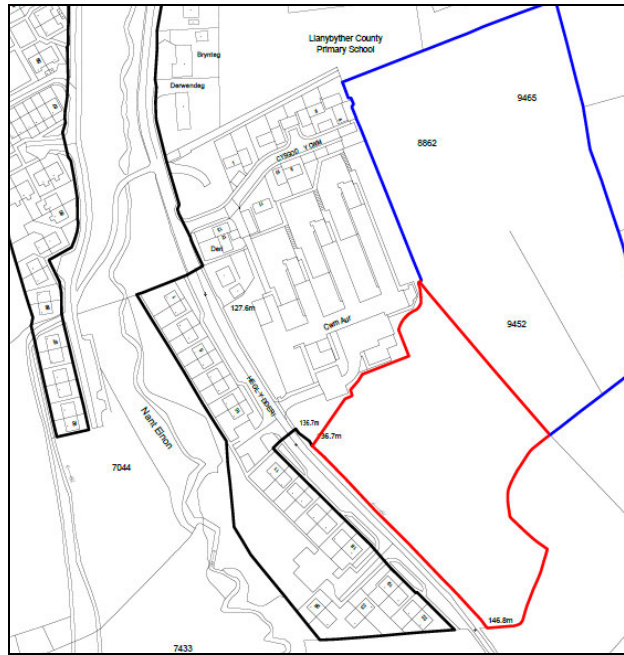
Forward Planning Manager,
Place and Sustainability,
Department of Sustainability and Infrastructure,
Carmarthenshire County Council
3 Spilman Street,
Carmarthen
SA31 1LE

Dear Sir/Madam,

Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft
Representation on behalf of Trustess of Highmead Estate
Land off Heol y Dderi, Llanybydder

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.

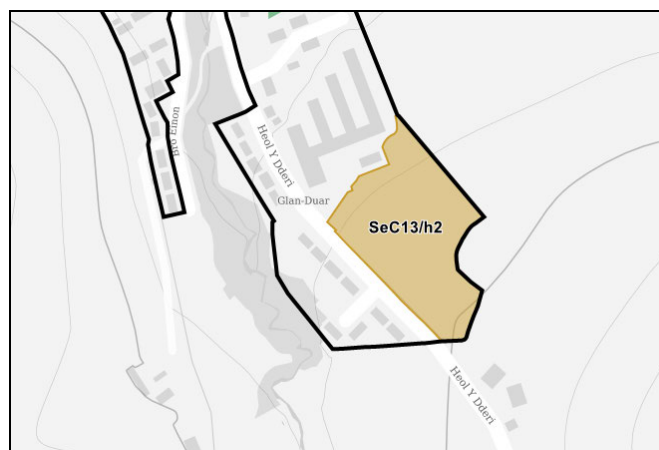
Our Client made a formal Candidate Site Submission in August 2018, which was referenced **SR/109/005**, seeking the allocation of their land for residential development within the defined settlement limits of Llanybydder as part of the Replacement Local Development Plan. The Candidate Site related to the land edged red in Plan A below.



Plan A

The Candidate Site comprised of a single enclosure, with its western boundary leading onto Heol y Dderi and existing development found directly to its north. Its remaining boundaries were then defined by established field boundaries. The land therefore clearly represented a logical extension opportunity to the existing settlement and its extents are illustrated by the red line below.

Following its due consideration, the Council then allocated the Candidate Site for residential development in its 1st Deposit LDP, published in January 2020 (Plan B).



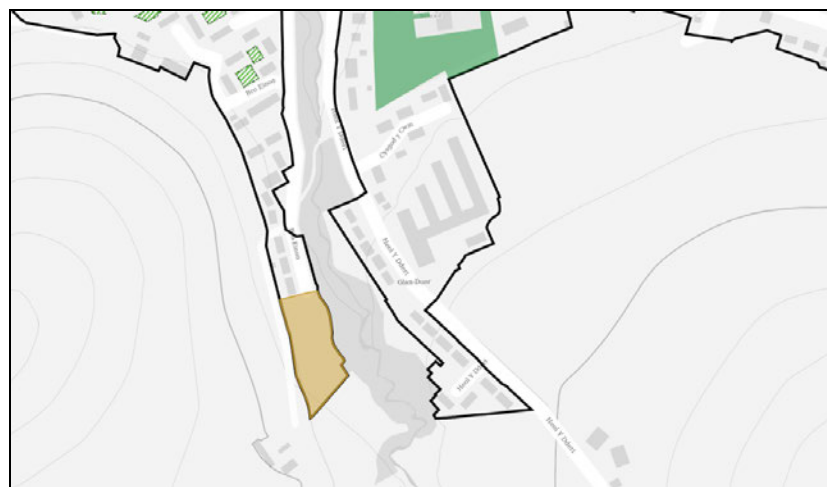
Plan B

Allocated under reference SeC13/h2, the allocation in its totality was expected to deliver a total of 30 units within 11-15 years of the Plan's commencement date.

Notwithstanding the above decision, and for reasons well known, the Council then revisited its 1st Deposit LDP in preparation of a second version. As part of the preparation process for the 2nd 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:

"Large scale development within Llanybydder is limited due to the town falling within the phosphate sensitive SAC catchment. It is considered that there is sufficient and more suitable land available for development within the town to accommodate its housing need

According then to the 2nd Deposit LDP Proposals Maps, the Site is no longer allocated for the purposes of residential development, as illustrated in Plan C.



Plan C

The rationale given by the Council in reaching its decision is deeply worrying and provides a strong indication that their process of assessment of Candidate Sites within the phosphate sensitive SAC catchment has been incorrect, in turn causing the Plan to be deemed unsound. The Council does not provide any evidence to substantiate its claim that *"Large scale development within Llanybydder is limited due to the town falling within the phosphate sensitive SAC catchment."* In fact, from our experience of dealing with planning applications within such catchment's, it is the larger scale developments that represent the more deliverable and viable option for securing new housing than the smaller sites.

As can be seen from the accompanying drainage drawing for a site at Heol Hathren, Cwmann, the area necessary to provide the infrastructure for dealing with phosphates on an on-site basis in line with the current regulatory requirements, would amount to 25% of the total site area. On this basis (and with allocation SeC13/h4 under construction), the proposed allocations put forward by the Council for Llanybydder – if technically possible – will only deliver 7 units. This is incredibly low for such a sustainable settlement containing a wide variety of community facilities and local services.

In addition to the above, the decision to not allocate the Alternative Site is not only technically flawed, 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 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 for the purposes of 24 units to allow for provision on site for the aforementioned foul water infrastructure.

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

- Completed Deposit LDP Representation Form
- Completed Sustainability Appraisal form
- Copy of Candidate Site Submission Report (August 2018)

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 not allocate the land in question and understand that this may be because the Council holds the view that alternative allocations within the wider Cluster 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 Cluster has a range of proposed residential allocations. Having undertaken a comprehensive review of the proposed allocations put forward by the 2nd Deposit LDP for the Cluster 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
SeC12/h1	Trem y Ddol, Newcastle Emlyn	17
SeC12/h3	Land to r/o Dolcoed, Newcastle Emlyn	20
SeC13/h1	Adjoining y Neyadd, Llanybydder	10
SeC14/h1	Blossom Garage, Pencader	20
SeC14/h2	Land adj. Maescader, Pencader	24
SuV33/h1	Land opp. Brogeler, Llangeler	
SuV28/h1	Maes y Bryn, Capel Iwan	6
SuV39/h1	Adj. Yr Hendre, Llanfihangel ar Arth	7
Su41/h2	Cilgwyn Bach, Pontyweli	14

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 2nd 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 currently proposed allocations 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,

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

Jason D Evans

Director