

Our Ref.: 1048.g

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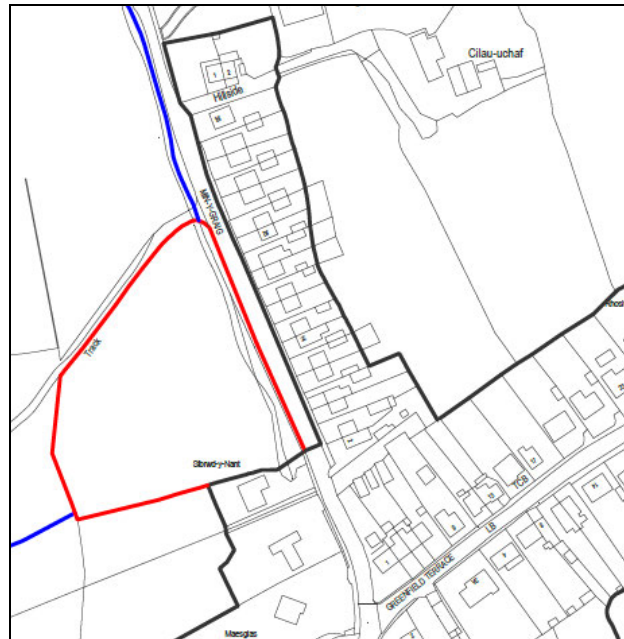
Forward Planning Manager,
Place and Sustainability,
Department of Sustainability and Infrastructure,
Carmarthenshire County Council
3 Spilman Street,
Carmarthen
SA31 1LE

Dear Sir/Madam,

Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft
Objection on Behalf of Mr N Richards
Land off Min y Graig, Pontyberem

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 clients made a formal Candidate Site Submission in August 2018, which was referenced **SR/138/010**, seeking the allocation of their land for future residential development within the defined settlement limits of Pontyberem as part of the Replacement Local Development Plan. The Candidate Site is edged red below in Plan A.



Plan A

The Candidate Site comprised of a single enclosure laid to grass, with its eastern boundary fronting onto the adjoining public highway, from which access to it was gained. Its remaining boundaries were as equally well defined through a combination of existing hedgerows, stock and domestic fencing.

Following its due consideration, the Council then excluded the Site from the proposed development limits for Ffairfach in its 1st 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:

“Development of the site would have a detrimental impact on the character and setting of the settlement. Furthermore, there is sufficient and more suitable land available for development within the village to accommodate its housing need.”

At the time of publication of the 1st Deposit LDP therefore, the Council presented two separate reasons for justifying its exclusion, although no further detail or explanation than the above statement was provided.

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:

“Development of the site would have a detrimental impact on the character and setting of the settlement. Furthermore, there is sufficient and more suitable land available for development within the village to accommodate its housing need.”

As can be seen, the rationale of the Council for the exclusion of the Site as an allocation in the LDP has remained the same. This is somewhat puzzling and illogical and for the reasons set out below, puts the soundness of the Plan into question.

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 therefore supplements the following documents, which comprise a complete submission to the 2nd Deposit LDP Consultation stage:

- Completed Deposit LDP Representation Form
- Completed Integrated 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

Under the provisions of the 2nd Deposit LDP, Pontyberem is defined as a Service Centre, representing one of the largest and most sustainable settlements in Cluster 3 of the Settlement Framework. Despite this, and the fact that the Council's objective through the Plan is to channel most development to these settlements, the current 2nd Deposit LDP has only allocated land for the provision of 34 new homes during the Plan period for the Service Centre, with one allocation not expected to deliver any housing until the last years of the Plan's lifetime. To therefore suggest that there is 'sufficient residential land' within the settlement to meet its community's needs and satisfy the strategic policies of the Plan is illogical and for the Council's proposals to remain unchanged would result in the Plan being 'unsound'.

In addition to the above, Pontyberem and the Cluster it forms part of 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
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

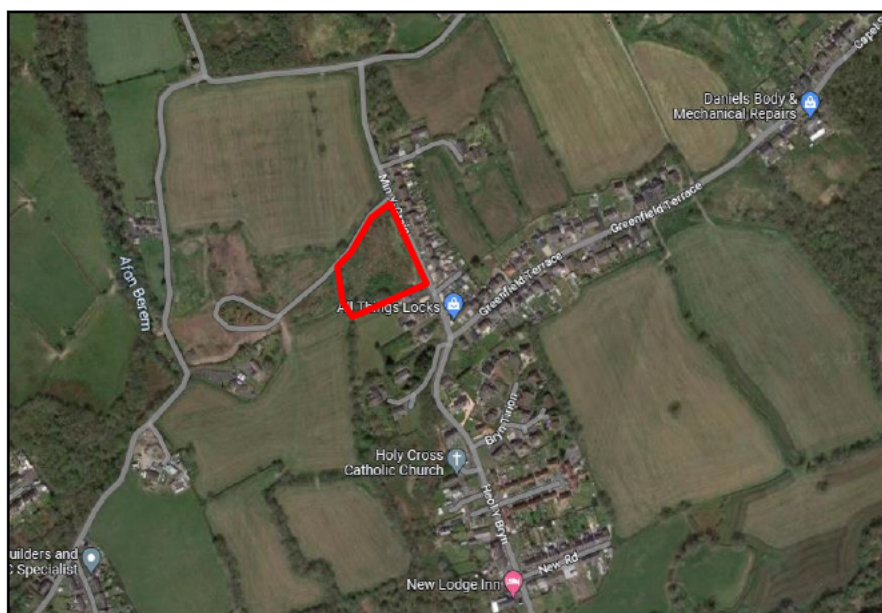
Table 1

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.

Development would lead to a detrimental impact on the character and setting of the settlement

The second reason given by the Authority for not allocating the Candidate Site was on the basis that in its view it would "... lead to a detrimental impact on the character and setting of the settlement."

As the accompanying Candidate Site Supporting Statement highlights, the Candidate Site is in fact well related to the existing settlement of Pontyberem. This is best appreciated from an aerial photograph (see below), which illustrates the close proximity of the site (edged red) to existing residential development to its south and west.



Photograph 1

As can also be seen from the aerial photograph, the 'character and setting' of Pontyberem is defined by residential development along its main arteries, with further in-depth developments of them, such as New Road and Bryn Tirion illustrated above. To suggest therefore that the development of the Site in the same manner would be 'detrimental' to the character and setting is incredulous and demonstrates that the assessment process of Candidate Site undertaken by the Council has been inconsistent and therefore flawed.

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