

Our Ref.: 1041.a

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

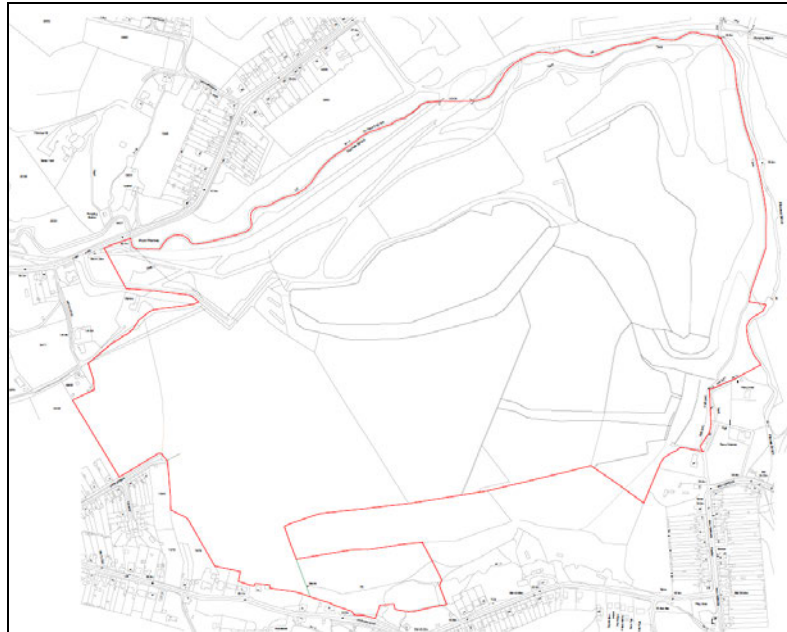
Forward Planning Manager,  
Place and Sustainability,  
Department of Sustainability and Infrastructure,  
Carmarthenshire County Council  
3 Spilman Street,  
Carmarthen  
SA31 1LE

Dear Sir/Madam,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft**  
**Representation on Behalf of Landview Developments Ltd**  
**Former Wernos Washery Site, 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** and **Policy SG1** 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.

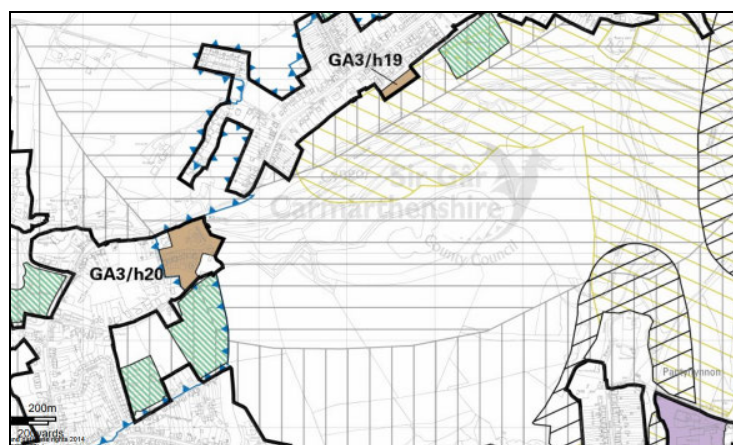
Our clients made a formal Strategic Candidate Site Submission in August 2018, which was referenced **SR/159/007**, seeking the allocation of their land (edged red on Plan A) for a mix of residential development, areas of formal and informal amenity space, habitat enhancement areas, as well as improvements to local pedestrian and cycle link provision and linkages, as part of the Replacement Local Development Plan.



**Plan A**

The Site would serve the settlement of Tycroes and the surrounding area of the associated Principal Centre (Cluster 3). The Strategic Candidate Site comprised of a series of existing enclosures, with vehicular access gained off the access estate road shared with a recently constructed residential development to its north east, although multiple pedestrian and cycle linkages would also be available along all boundaries of the site. Locationally, the site is also within close proximity to the range of community facilities and local services the settlement and surrounding area has to offer.

Following its due consideration, the Council then excluded undeveloped element of the Site from the proposed development limits for Tycroes 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 in its entirety would have a detrimental impact upon the character and setting of the settlement and would exceed identified housing need. In considering smaller areas of the site for inclusion it is concluded that there is sufficient and more suitable land available elsewhere in Tycroes to meet its housing needs.”*

The above decision was somewhat puzzling and in our view erroneous, particularly as alternative allocations within the settlement and wider growth area were clearly neither appropriate nor deliverable. In addition, the assessment also clearly failed to take into account the mix of proposed uses, that reflected the immediate and wider landscape setting.

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

*“Inclusion of the site in its entirety would have a detrimental impact upon the character and setting of the settlement and would exceed identified housing need. In considering smaller areas of the site for inclusion it is concluded that there is sufficient and more suitable land available elsewhere in Tycroes to meet its housing needs.”*

As can be seen, the rationale presented by the Council replicates that at the 1<sup>st</sup> Deposit LDP stage (impact on character and housing land supply), although when examined fully (see below), they appear both illogical and erroneous. Specifically, we consider that alternative allocations within the settlement and wider Principal Centre are neither appropriate nor deliverable (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** and **Policy SG1** 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 Integrated Sustainability Appraisal form
- Copy of Candidate Site Submission Report (August 2018)
- Ecological Appraisals
- Transport Statement
- Indicative Master Plan

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

#### *Detrimental impact upon the character and setting of the Settlement*

The first part of the Council's rationale for the Site's exclusion relates to the Council's perception that its development for the proposed mix of uses would lead to a "... *detrimental impact upon the character and setting of the settlement*". However, beyond this statement, the Council has provided no further explanation of what 'detriment' would occur and to which elements of the settlements "... *character and setting*...".

As the originally submitted supporting information (copy enclosed) illustrates, the Strategic Alternative Site does not form part of nor does it adjoin any designated Conservation Area. In fact, the nearest (Llandeilo) is located a considerable distance to the north. Furthermore, the Site does not contain nor is it within sight of any Listed Building or Ancient Monument. In summary therefore, the allocation of the Site for the proposed mix of uses, would not have any detrimental impact on the character or setting of any nearby historic interest.

From a landscape designation perspective, the Alternative Strategic Site does not form part of a National Park or Area of Outstanding Beauty. On a more local level, the current LDP has not defined any part of the Site or surrounding area as part of a Special Landscape Area. The allocation of the Site for the proposed mix of uses, would not therefore have any detrimental impact on the character or setting of any national or local landscape designation.

In terms then of the physical form of the adjoining settlement of Tycroes, its historic evolution has followed the principal access routes to, through and within it, with later more recent development then taking place in a more 'in-depth' manner of these routes. To suggest then that the development of the relevant elements of the Strategic Alternative Site would be counter – and so detrimental – to this existing setting and character is illogical. The proposed pattern would in fact mirror and compliment the existing pattern of the adjoining settlement and the erroneous inconsistent decision to exclude the Site by the Council is in itself grounds to highlight that the 2<sup>nd</sup> Deposit LDP is unsound.

### *Sufficient Residential Land Allocated Within Settlement*

The second 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 Tycroes and the wider Principal Centre it forms part of will deliver sufficient housing for the town 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:

<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 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 and that the Council's assessment of the Alternative Strategic Site was flawed.

We therefore respectfully request that this Representation be given careful examination, and consequently the land in question be allocated for mixed use 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**