

Our Ref.: 1022.a

Date: 5th April 2023

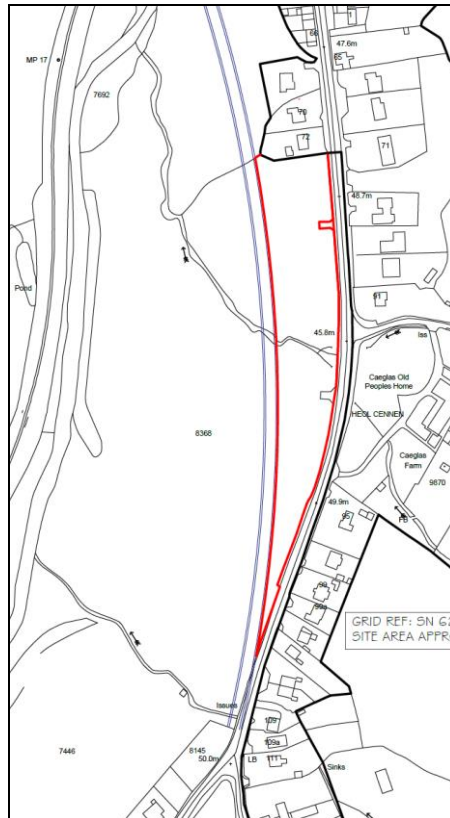
Forward Planning Manager,
Place and Sustainability,
Department of Sustainability and Infrastructure,
Carmarthenshire County Council
3 Spilman Street,
Carmarthen
SA31 1LE

Dear Sir/Madam,

Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft
Representation on Behalf of Mr G Green
Land off Heol Cennen, Ffairfach

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.

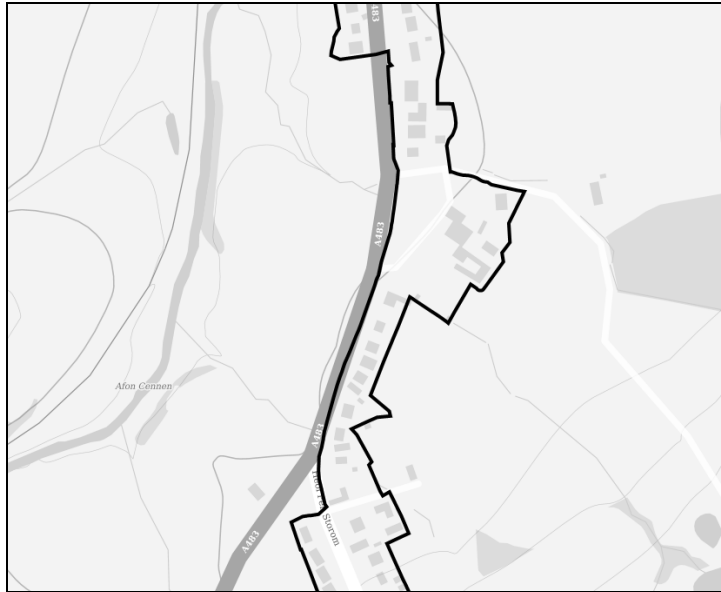
Our clients made a formal Candidate Site Submission in August 2018, which was referenced **SR/080/007**, seeking the allocation of their and adjoining land for future residential development within the defined settlement limits of Ffairfach as part of the Replacement Local Development Plan. The Candidate Site is edged red below in Plan A.



Plan A

The Candidate Site comprised of the frontage elements of two existing enclosures, providing a development opportunity that mirrored existing development found on the eastern side of the adjoining public highway. The form and extent of the Candidate Site was also dictated by future aspirations of the Welsh Government (Transport Division) in relation to the Llandeilo and Ffairfach bypass and so ensured that this strategic project would not be prejudiced in any way, should it come forward.

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 would lead to an unacceptable extension of the urban form. There is sufficient residential land allocated in the settlement.”

At the time of publication of the 1st Deposit LDP therefore, the principle reason presented by the Council for the exclusion of the site from the development limits and its non-allocation for residential development, was on the basis that the Council considered there to be sufficient alternative sites within the settlement to accommodate the housing need.

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 would lead to an unacceptable extension of the urban form. There is sufficient residential land allocated in the settlement. The Site will remain outside of limits.”

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, Ffairfach in conjunction with Llandeilo and Rhosmaen is defined as a Service Centre, representing the largest and most sustainable settlement in Cluster 5 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 27 new homes during the Plan period for the Service Centre. 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 incredulous and for the Council’s proposals to remain unchanged would result in the Plan being ‘unsound’.

In turn, the Service Centre then forms part of a group of settlements defined as Cluster 5 in the Settlement Framework, with the table below providing an indication of the proposed allocations in the 2nd Deposit LDP for the cluster.

Ref. No.	Site Name	Units
SeC15/h1	Land to north of Dan y Crug, Llandovery	61
SeC15/h2	Land adjacent to Bryndeilog, Tywi Avenue, Llandovery	8
SeC16/h1	Llandeilo Northern Quarter, Llandeilo	27
SeC17/h1	Land opp. Llangadog C.P School, Llangadog	16
SeC17/h3	Ger yr Ysgol, Llangadog	21
SuV49/h1	Ael y Mynydd, Llanfynydd	13
SuV51/h1	Opp. Village Hall, Cwmifor	

Table 1

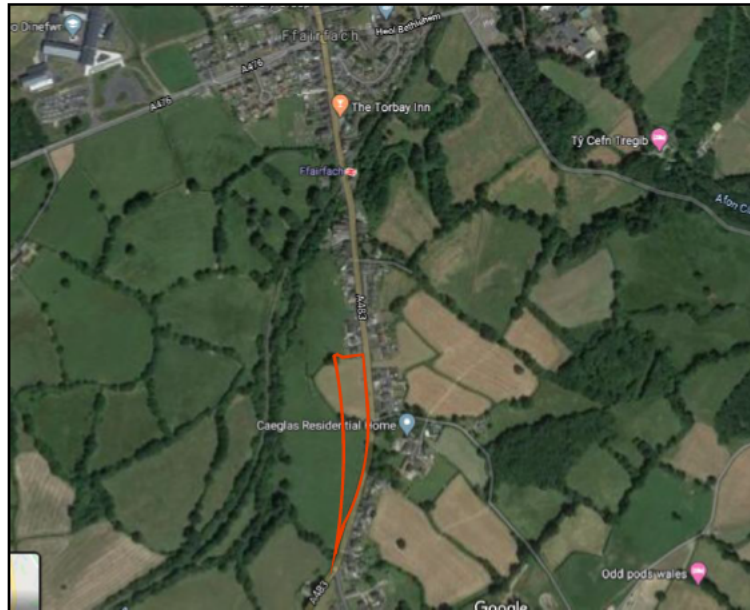
The above provides a worrying picture with regard to housing supply in the Cluster in question. Despite being the largest and most sustainable Service Centre of Cluster 5, Llandeilo/Rhosmaen/Ffairfach has a far lower level than the smaller settlement of Llandovery and less than half the number allocated for Llangadog, despite the settlement being half the size of Llandeilo.

The above is even more worrying when the deliverability, or the ability to deliver the assigned number of units of some of the above allocations are in serious question (SeC17/h1 and SuV51/h1), as well as some sites despite being allocated for over 30 years, still having not delivered as single unit (SeC15/h1)

As a result of the above, separate objections have been made in relation to a number of the aforementioned allocations and it is therefore important that alternative more deliverable sites should be identified, to ensure the Plan can be regarded as being 'sound' in targeting new housing development at the most sustainable location.

Development would lead to an unacceptable extension of the Urban Form.

The second reason given by the Council for not allocating the Candidate Site was on the basis that in its view it would "... *lead to an illogical extension fo the urban form.*".As the accompanying Candidate Site Supporting Statement highlights, the Candidate Site is in fact well related to the existing settlement of Ffairfach and its current urban form. This is best appreciated from an aerial photograph (see below), which illustrates the close proximity of the site (edged red) to existing residential development and the fact that it would represent a logical rounding-off opportunity of the settlement at this location.



Photograph 1

From an accessibility perspective, the site is within short walking distance of a number of the settlement's community facilities and local services, as well as well served bus stops. The allocation of the Candidate Site would not only represent a logical addition to the existing urban form, but would also represent a sustainable form of development.

In view of the above, the decision of the Council is again somewhat confusing, when the merits and attributes of the Candidate Site are taken into consideration. The decision is then even more confusing – and indeed inconsistent – when similar allocations such as that proposed for Cwmifor are taken into consideration. Both this allocation and the Candidate Site clearly share the same attributes and objectives of rounding-off the existing urban form of their respective settlements through mirroring existing residential development on the opposite side of the public highway to which they relate. On this basis, the consistency of approach with regards to the assessment of sites must be called into question and indeed the soundness of the Plan.

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 the sender.

Jason D Evans
Director