

Our Ref: EBP/HOM1 (PrC2/h22)

Date: 5th April 2023

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

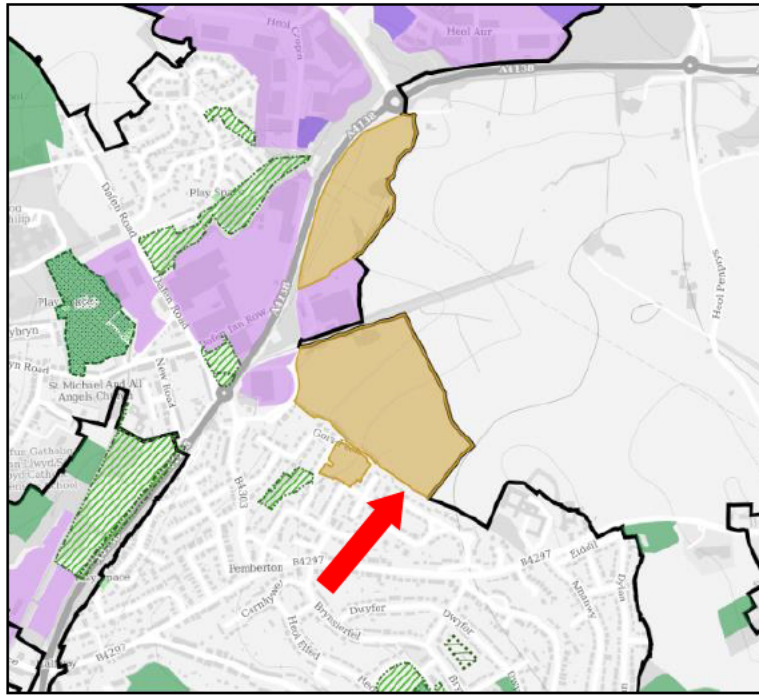
Dear Sir,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft
Objection to Policy HOM1 on behalf of Evans Banks Planning Ltd
Site PrC2/h22 – Cwm y Nant, Dafen**

Further to the publication of the above document, we have been asked by our Clients 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 it necessary to make a formal representation to the “soundness” of the Carmarthenshire Deposit Local Development Plan in relation to the allocation for residential development at land at **Cwm y Nant, Dafen (LDP Ref. No. PrC2/h22)** under the provisions of Policy HOM1. The proposed allocation has been fully assessed and in considering its context and background (summarised below) it is considered that its continued inclusion will lead to the Plan failing the 3 Tests of Soundness for the reasons set out below.

Site Background and Context

The allocation relates to the land shaded brown on the Proposals Map extract below and is proposed for allocation in the 2nd Deposit LDP for the purposes of 202 residential units.



Plan A

(Extract of Proposals Map for Cwm y Nant Allocation)

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 and existing allocations within the current adopted LDP. Proposed allocation PrC2/h22 was considered as part of this process and as a result the Council concluded as follows:

“Part of the allocation was not included in candidate site submission SR/086/025. Part of the remainder to be retained as a residential allocation as part of a wider area at Cwm Y Nant. Reference is made to site SR/086/025 et al below. Site to be allocated (part) with reference PrC2/h22.”

“Site(s) to be retained as a residential allocation. Reference is made to site GA2/h30 above. Site to be allocated with reference PrC2/h22 (only part of GA2/h30).”

It is clear from the above that the Council considers that the site is deliverable for the purposes of 202 houses, although it is not clear on what basis this conclusion has been made.

The allocation is greenfield in nature with its topography sloping gently from the south to the north. The southern perimeter of the site is bordered by residential properties while the

western and northern boundaries are bordered by industrial uses. The eastern boundary is then bordered by further greenfield land as can be seen from the aerial photograph below (outlined in red below).



Photograph 1
(Extract from Google Earth – June 2021)

Access to the allocation is currently unknown, however the north western perimeter of the site borders Nant y Gro (see below).

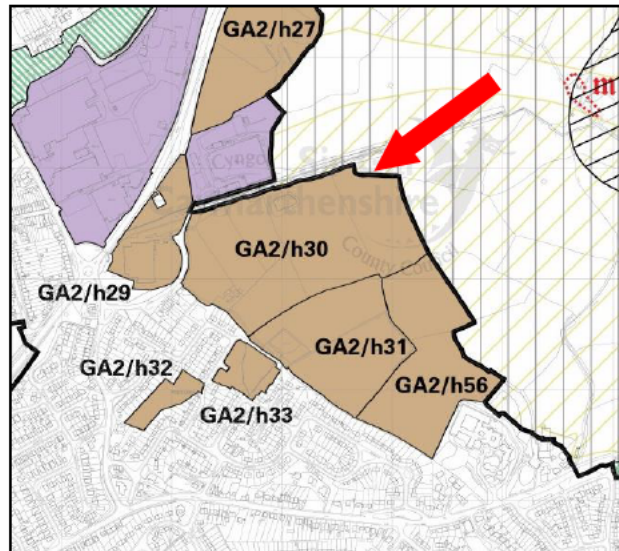


Photograph 2
(Streetscene of Nant y Gro)

Outline Planning Permission was first granted for the *Proposed Residential Development for 26 Bungalows (S/25729)* in the southernmost part of the allocation. Outline Planning Permission was also granted for the whole site in 2021 for the *Proposed Construction of up*

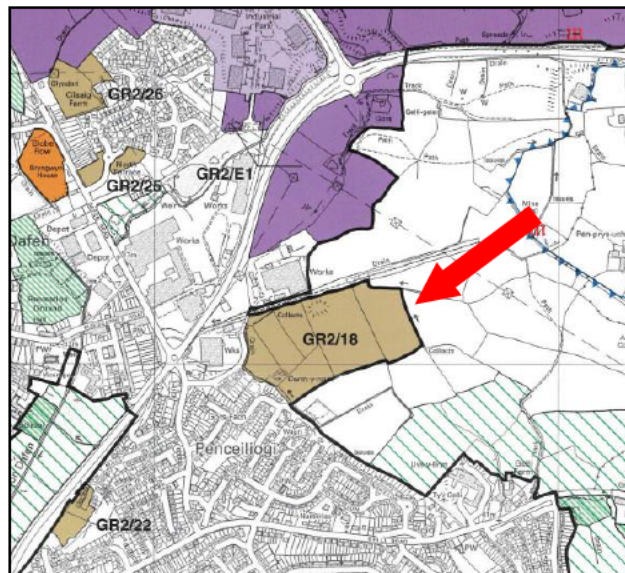
to 202 Units with Associated Landscaping and Infrastructure Works (S/40692). However there have been no applications made to further this development to date.

The site makes up part of an allocation in the *Carmarthenshire Local Development Plan (2014)* under Allocation GA2/h3 as well as the *Carmarthenshire Unitary Development Plan (2006)* under allocation GR2/18 as can be seen below.



Plan B

(Extract of current LDP Proposal Map for Cwm y Nant (Adopted 2014))



Plan C

(Extract of Carmarthenshire UDP Proposal Map for Cwm y Nant (Adopted 2006))

Despite having almost 20 years of support for the principle of residential development at the historic allocation from the Council, **not a single housing unit has been delivered to date.** We are led to believe that there is also **no active marketing strategy** for the development and the Council being the landowners are merely seeking to secure an outline permission on their own land asset.

Tests of Soundness

Based on the above information and the guidance documents provided by the Welsh Government and Council itself, it is considered that the inclusion of the adoption of the LDP in its current form with the inclusion of the allocation in question, would result in it failing to meet the requirements of the Tests of Soundness, for the reasons summarised below.

Test 1 – Does the Plan Fit?

The allocation fails the test of soundness as its inability to be delivered is in conflict with **Paragraph 4.2.2 of Planning Policy Wales (Edition 11)** requirements of national planning policy.

Test 2 – Is the Plan appropriate?

The allocation fails the test of soundness as its **inability to be delivered** would fail to address key issues set out by the Plan (housing supply). The Council's decision to allocate the land appears to not have been done so on credible or robust evidence.

Test 3 – Will the Plan deliver?

The allocation fails to test the soundness as the site is clearly unable to deliver any new housing. The **Welsh Governments Development Plans Manual (Edition 3)** is quite clear with regard to rolling forward allocations and states that allocations *"... rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered"*. No evidence has been presented to demonstrate a change in circumstances to indicate the allocation will now be deliverable and so its continued allocation would lead to the plan being deemed unsound on this basis.

In summary, we **object** to the inclusion of the allocation in question on the basis of the above and that its inclusion within the Plan would result in the document being '**unsound**'.

We therefore respectfully request that this Representation be given careful examination, and that the allocation be removed to ensure that the document passes all the relevant tests of soundness.

Kind regards



Richard Banks

Director



Jason Evans

Director