

Our Ref: EBP/HOM1 (SeC18/h3)

Date: 28th March 2023

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

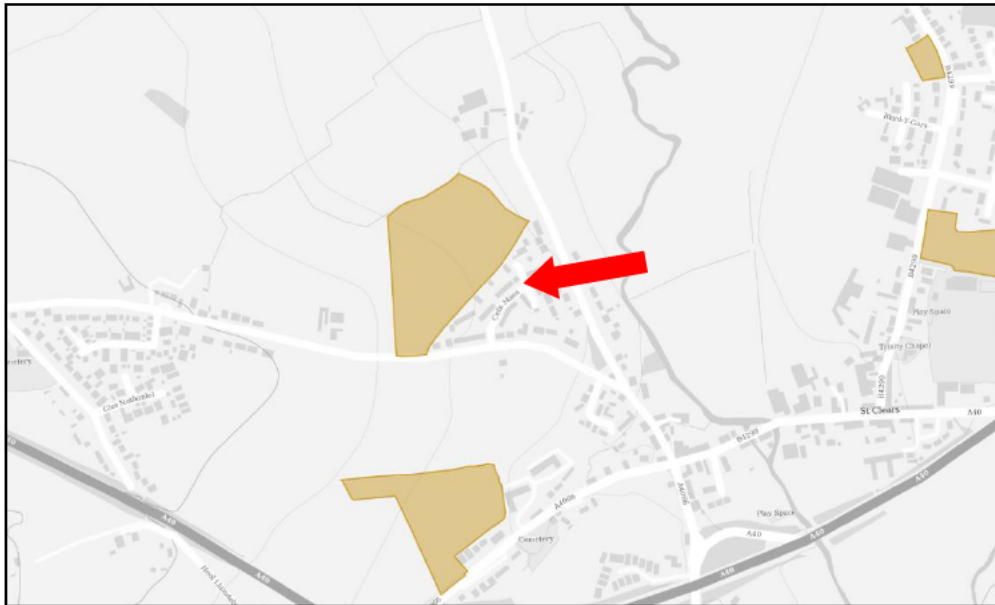
Dear Sir,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft
Objection to Policy HOM1 on behalf of Evans Banks Planning Ltd
Site SeC18/h3 – Land Adjacent to Cefn Maes, St Clears**

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 Adjacent to Cefn Maes, St Clears (LDP Ref. No. SeC18/h3)** 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 100 residential units.



Plan A

(Extract of Proposals Map for St Clears and land Adjacent to Cefn Maes 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 SeC18/h3 was considered as part of this process and as a result the Council concluded as follows:

“Site to be allocated with reference SeC18/h3.”

It is clear from the above therefore that the Council considers that the site is deliverable for the purposes of 100 houses, although it is not clear on what basis this conclusion has been made. It is also unclear how the allocation of a previously allocated ‘green wedge’, used in order to protect local green spaces as well as to prohibit the coalescence of settlements, would now be deemed to be appropriate for future housing development.

The allocation is greenfield in nature with its topography being relatively level. The site is made up of two enclosures with much of the perimeter of the allocation being covered with mature vegetation, trees and hedgerows, as can be seen from the aerial photograph below (outlined in red below).



Photograph 1
(Extract from Google Earth – June 2021)

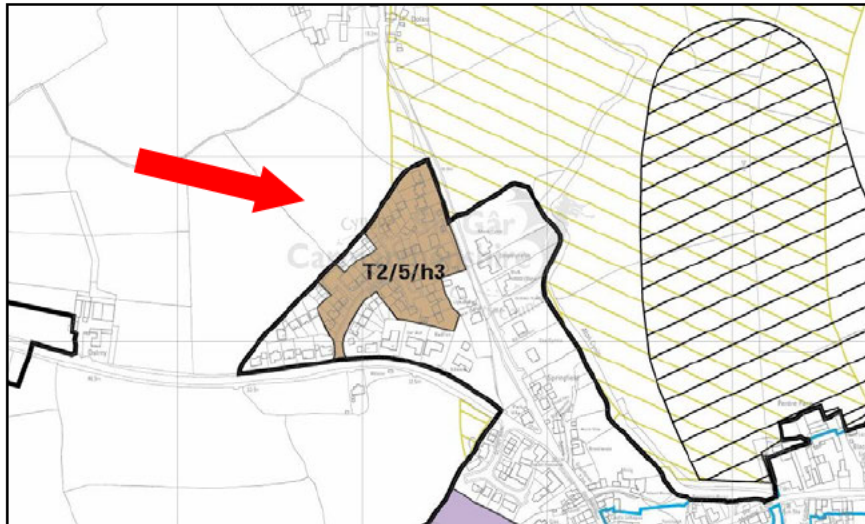
Access to the allocation is currently gained via an existing residential site known as Cefn Maes (see below).



Photograph 2
(Streetscene of Cefn Maes)

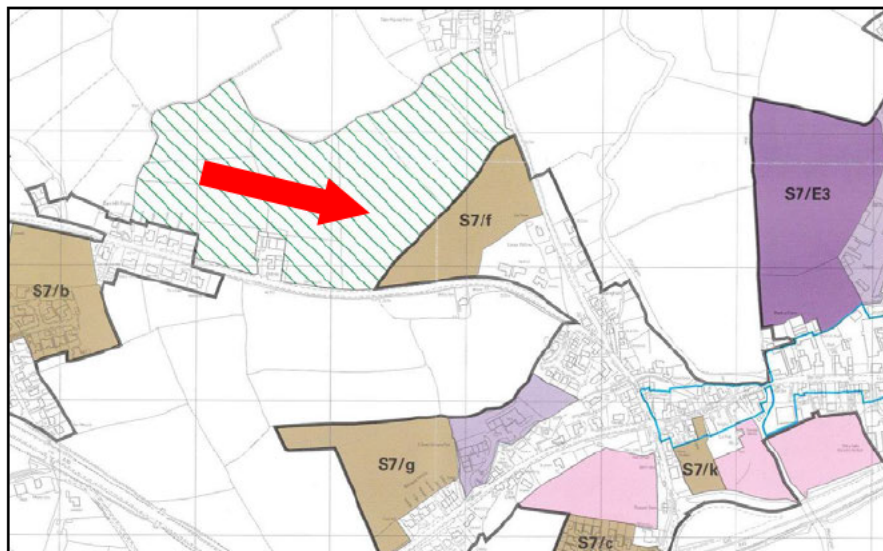
There have been no planning applications made relating to the allocation site in question to date.

Although the site was not allocated for development in the *Carmarthenshire Local Development Plan (2014)*, the site was not included within the defined settlement limits of St. Clears. As well as this, within the *Carmarthenshire Unitary Development Plan (2006)*, the allocation site was defined as a green wedge (as can be seen below).



Plan B

(Extract of current LDP Proposal Map for land Adjacent to Cefn Maes (Adopted 2014))



Plan C

(Extract of Carmarthen UDP Proposal Map for Allocation Site (Adopted 2006))

The purpose of the 'Green Wedge' allocation from Plan C is clear – to prevent an instance that could contribute towards the coalescence of settlements (Pwll and St. Clears).

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 due to its inappropriateness with regards to the principles of sustainable growth and so 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 (protection of landscape quality). 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 fact that the site wasn't allocated within the defined settlement limits on the current Carmarthenshire LDP demonstrates that the site is encroaching towards the open countryside and does not reflect the layout of the town. Also, given that the site was once allocated as a green wedge, within the Carmarthenshire UDP, indicates that the area is of natural importance and that development in this area was not deemed acceptable due to it resulting in a situation that could lead to the coalescence of settlements. Therefore, the allocation of this site for the purposes of residential development 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