

Our Ref.: 1044.a

Date: 6<sup>th</sup> April 2023

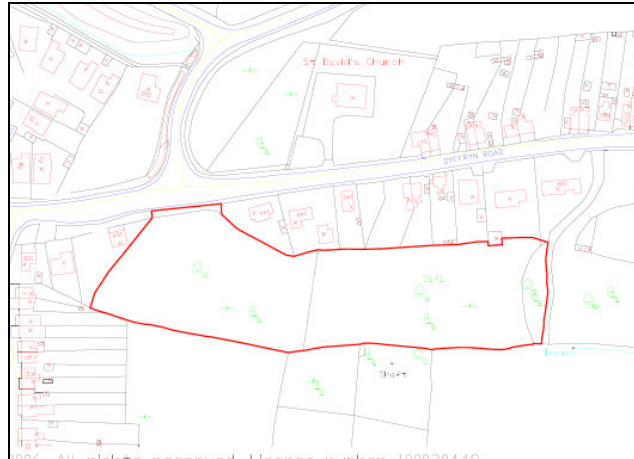
Forward Planning Manager,  
Place and Sustainability,  
Department of Sustainability and Infrastructure,  
Carmarthenshire County Council  
3 Spilman Street,  
Carmarthen  
SA31 1LE

Dear Sir/Madam,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft**  
**Representation on Behalf of Ms D England and Mr D Davies**  
**Land off Dyffryn Road, Saron**

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 that the proposed provisions of **Policy HOM1** are of particular interest to our Clients. 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/149/010, seeking the allocation of their land for future residential development within the defined settlement limits of Saron as part of the Replacement Local Development Plan. The Candidate Site (edged red below) comprised of two existing enclosures, accessed directly off the adjoining public highway on its northern boundary.



**Plan A**

The enclosures are then well defined, with existing residential development to its north, east and to a degree west. The site is also within close proximity to the range of community facilities and local services the settlement has to offer.

Following its due consideration, the Council then excluded the Site from the proposed development limits for Saron 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:

*“There is sufficient and more suitable land available in Saron to meet its housing needs.”*

At the time of publication of the 1<sup>st</sup> Deposit LDP therefore, the only 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 and more suitable land available in the settlement for residential development.

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 Clients land was considered as part of this process and as a result the Council continued to exclude it from allocation, concluding as follows:

*“There is sufficient and more suitable land available in Saron to meet its housing needs. Inclusion of the whole site would result in a pattern of development which would have a detrimental impact on the character and setting of the settlement.”*

As can be seen, the initial rationale presented by the Council includes that at the 1<sup>st</sup> Deposit LDP stage, but also now includes a claim that the development of the Site would be detrimental to the character and setting of the settlement of Saron. No explanation as to why the change in assessment has been made has been given by the Council.

For the reasons set out below, we consider the Site’s exclusion for the reasons given by the Council to be an illogical and erroneous decision and consider therefore that the LDP as it stands is “unsound” and fails to meet the required Tests of Soundness. This is particularly worrying, in view of the lack of deliverable allocations within the Principal Tier of which the Alternative Site forms part of.

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 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 Sustainability Appraisal form
- Copy of Candidate Site Submission Report
- Copy of Transport Statement

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

### *Sufficient Residential Land Allocated Within Settlement*

We understand from discussions with Officers that 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 Saron and the wider Principal Centre it forms part of will deliver sufficient housing for the area 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**

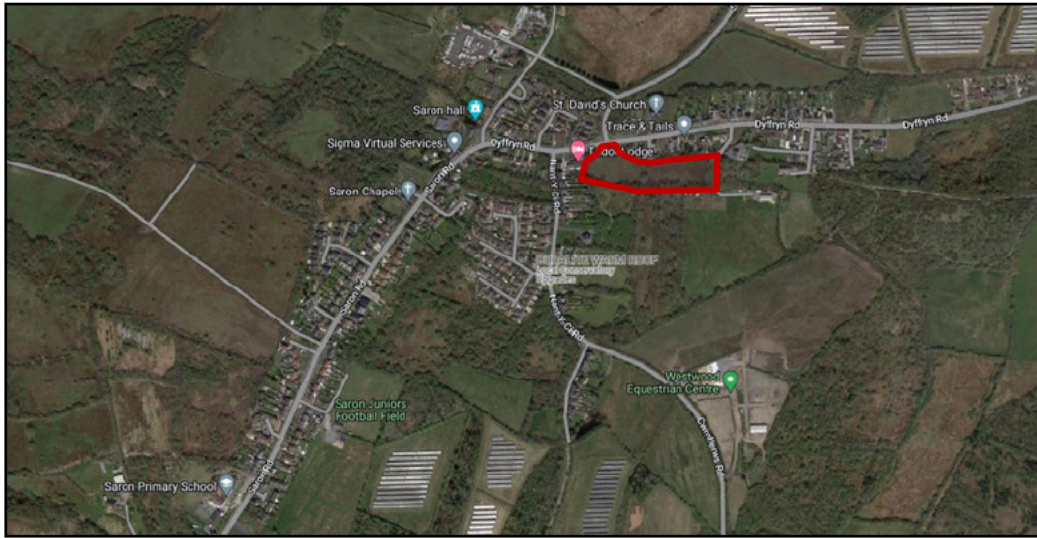
As a result of the above – all of which have been allocated in previous development plans - separate objections to their inclusion with the LDP have been made. This is due to the fact that to continue to allocate such sites for residential development results in the Plan being unsound. Alternative sites, such as that put forward by our Clients, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.

### *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 its development would result in a “...*detriemntal impact on the charater 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 Saron, forming an infill site between its existing built up elements directly to the north, east and west. This is best appreciated from

an aerial photograph (see below), which illustrates the close proximity of the site (edged red) to existing residential adjoining development.



**Photograph 1**

Photograph 1 also provides an illustration of the current form and character of the settlement of Saron, in that it is a settlement that has evolved along and out from Dyffryn Road, which runs through it. The Alternative Site – being directly on Dyffryn Road – would therefore follow this character and respect its setting. The Council's claim to the contrary is therefore frankly bizarre and clearly erroneous. The allocation of the Alternative Site would therefore represent a logical addition to the existing urban form.

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 the reasons given are illogical and erroneous. In addition, it has been highlighted in conjunction with our submissions made by this Practice, that the currently proposed allocations put forward by the 2<sup>nd</sup> Deposit LDP 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**