

Our Ref: EBP/HOM1 (SeC12/h3)

Date: 30th 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 SeC12/h3 – Land to r/o Dolcoed, Newcastle Emlyn**

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 to r/o Dolcoed, Newcastle Emlyn (LDP Ref. No. SeC12/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 Proposal Map extract below and is proposed for the allocation in the 2nd Deposit LDP for the purposes of 20 residential units.



Plan A

(Extract of Proposal Map for Newcastle Emlyn and Land to r/o Dolcoed 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 SeC12/h3 was considered as part of this process and as a result the Council concluded as follows:

“Site to be allocated for residential use with reference SeC12/h3.”

It is clear from the above therefore that the Council considers that the site is deliverable for the purposes of 20 houses, although it is not clear on what basis this conclusion has been made.

The allocation itself is greenfield in nature and is currently used as agricultural land. The topography of the site is then generally level. The northern boundary of the site is bordered by residential properties along the A484 while the southern boundary is bordered by mature vegetation and trees, as can be seen from the aerial photograph below (allocation circled red).



Photograph 1
(Extract from Google Earth – June 2021)

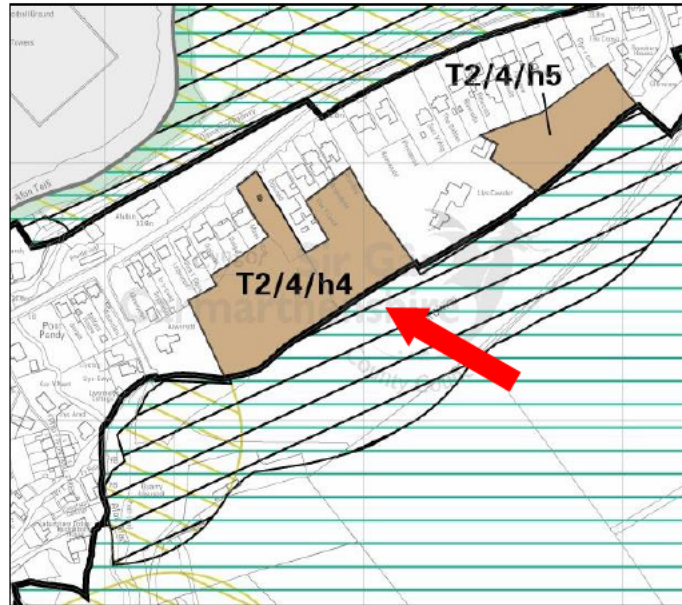
Access to the allocation is currently gained via a rear access track (south of the allocation site). However, the western boundary of the allocation also borders the A484 (see below).



Photograph 2
(streetscene of A484)

There have been **no planning applications** made relating to the site subject of this allocation to date.

The site was allocated in the *Carmarthenshire Local Development Plan (2014)* as allocation (T2/4/h1), as can be seen below.



Plan B

(Extract of current LDP proposal map for Land to r/o Dolcoed (Adopted 2014))

Despite having almost 10 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.**

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