

Our Ref: EBP/HOM1 (SeC9/h2)

Date: 28th March 2023

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

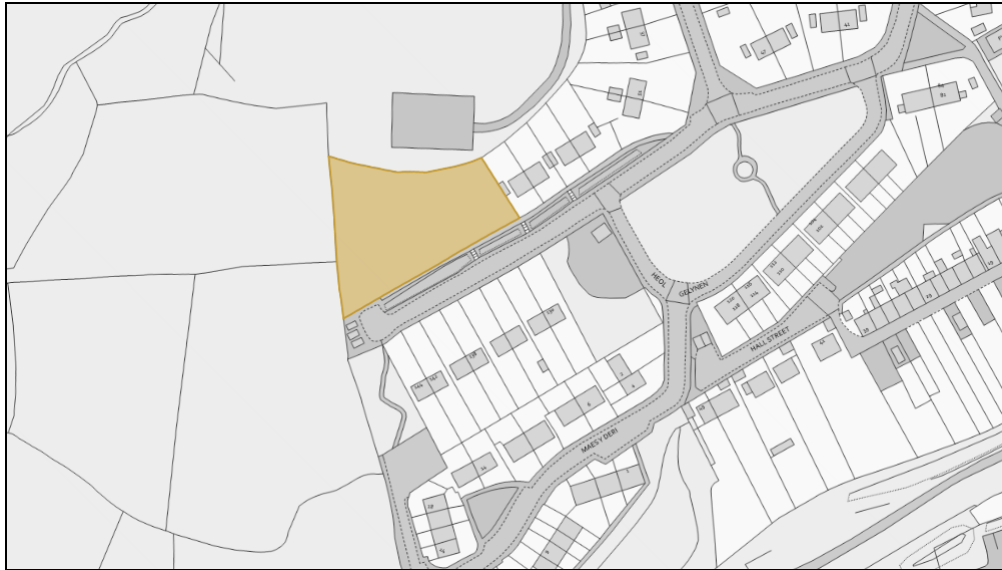
Dear Sir,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft
Objection to Policy HOM1 on behalf of Evans Banks Planning Ltd
Site SeC9/h2 – Heol Gelynen, Brynamman**

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 **Heol Gelynen, Brynamman (LDP Ref. No. SeC9/h2)** 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 8 residential units.



Plan A

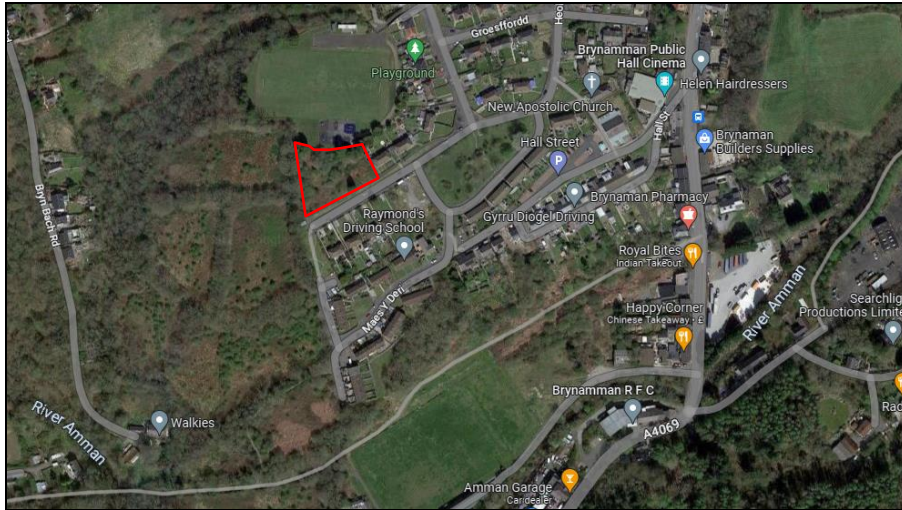
(Extract of Proposals Map for Brynamman and Allocation Site)

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 SeC9/h2 was considered as part of this process and as a result the Council concluded as follows:

“Site to be allocated with reference SeC9/h2.”

It is clear from the above therefore that the Council considers that the site is deliverable for the purposes of 8 houses, although it is not clear on what basis this conclusion has been made.

The allocation is greenfield in nature with its topography being relatively level while the site is raised above the road level. Much of the site is 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)

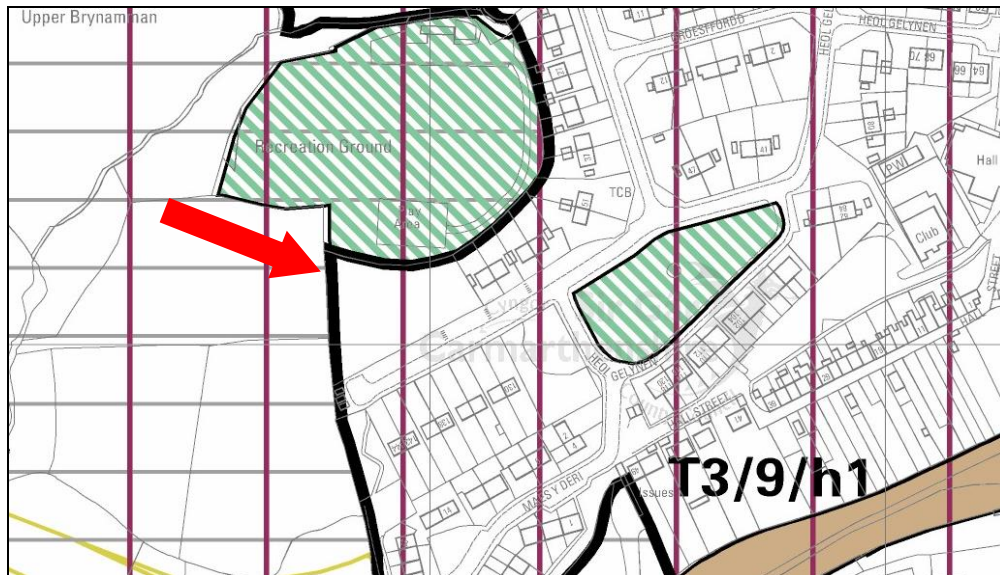
Access to the site is currently gained from Heol Gelynen, being a narrow, dead end road, located to the south of Brynamman (see below).



Photograph 2
(Streetscene of Heol Gelynen, Brynamman)

Prior notification for the *Demolition of and removal of all rubble from six cornish houses* was granted on the site in 2007, this being the **only** planning application relevant to the allocation.

Although the site was not allocated for the purposes of residential development in the *Carmarthenshire Local Development Plan (2014)*, the site was within the defined settlement limits of Brynamman (see below).



Plan B

(Extract of Current Proposal Map for Brynamman)

As of yet no planning application regarding residential development have been submitted at the site and therefore **not a single housing unit has been delivered to date**. This in turn, questions its deliverability and reliability as a housing allocation.

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 and reliability 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 and reliability 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 deliverability of the allocation site is of concern due to a number of factors. The first concern being that of the highway infrastructure along Heol Gelynen. The narrow road would not be satisfactory for the development of 8 new residential units along the street as well as issues being caused during the construction period. The second factor of concern is that of biodiversity. The construction of 8 new dwellings at this location would have detrimental impacts on the biodiversity interests on the site. As previously mentioned, the site is covered in mature vegetation, trees and hedgerows. The allocation of this site 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

Richard Banks

Director

Jason Evans

Jason Evans

Director