

Our Ref.: 1043.a

Date: 30th March 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 Low Carbon Construction Ltd
Former Emlyn Brickworks Site, Penygroes

Further to the publication of the above document, we have been asked by our Client 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** and **Policy SG 1** are of particular interest to our Client. As a result, we offer the following for the Authority's consideration, and Inspector's in due course.

Our clients made a formal Strategic Candidate Site Submission in August 2018, which was referenced **SR/132/009**, seeking the allocation of their land (edged red on Plan A) for a mix of residential development, areas of formal and informal amenity space, together with an area preserved for ecological interests, as part of the Replacement Local Development Plan.



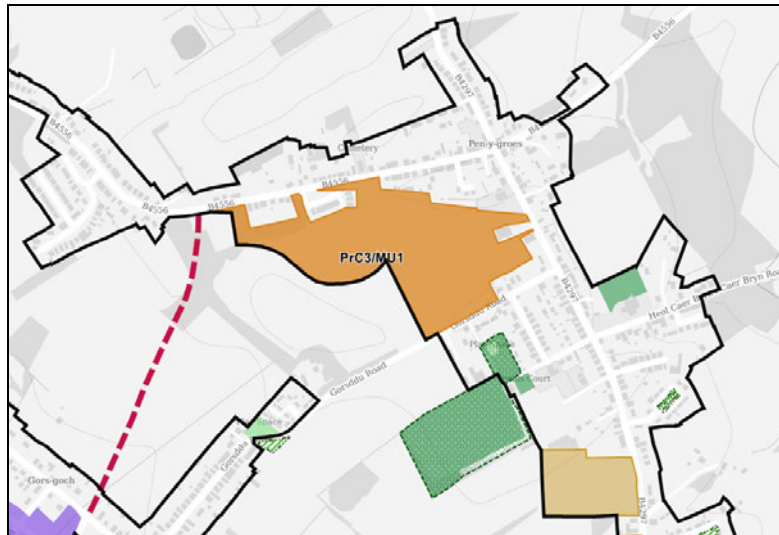
Plan A

The site would serve the settlement of Penygroes and the surrounding area of the associated Principal Centre. The Strategic Candidate Site comprised largely of a single enclosure of brownfield land, with vehicular access gained off the newly constructed A4076 spur leading to Norton Road to the north, Waterloo Road to the east and Gorsddu Road to the south. Several pedestrian and cycle points of access are also located on each of these boundaries. Locationally, the Site is also within close proximity to the range of community facilities and local services the settlement and surrounding area has to offer.

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 are concerns regarding the deliverability of the whole site, and so it is considered appropriate to allocate part of the site for mixed use. The site reference is PrC3/MU1."

As a result of the above, only an element of the Alternative Strategic Site was proposed for allocation, as illustrated by Plan B below.



Plan B

At the time of publication of the 1st Deposit LDP therefore, the only reason presented by the Council for not allocating the whole of the Site, was on the basis of concerns with regards to its delivery in totality. It should be noted, that there has been a strong desire by the land owners and developers for some time to see the Parc Emlyn site developed out, but this has been hampered and significantly delayed due to the lengthy process of the construction of the new A4076 (broken red line on Plan B). With its recent completion, progress on the development of the Parc Emlyn site can continue and there are in fact two planning applications currently being prepared for elements of it.

Notwithstanding the above decision, and for reasons well known, the Council then revisited its 1st Deposit LDP in preparation of a second version. As part of the preparation process for the 2nd Deposit LDP, the Council have published a "Site Assessment Table" (2023), which provides details of the Council's analysis of each received Candidate Site submission, including that subject of this objection. We note that our Clients Site was considered as part of this process and as a result the Council concluded as follows:

"There are concerns regarding the deliverability of the whole site, and so it is considered appropriate to allocate part of the site for mixed use. The site reference is PrC3/MU1."

Accordingly, the 2nd Deposit LDP Proposals Maps replicate the position shown by those of the 1st Deposit (Plan B), with the rationale given by the Council for doing so also remaining unchanged.

For the reasons given above, this is not only an illogical and ill informed decision, but also appears to be a dangerous and erroneous decision to make, particularly in light of the level of under provision of deliverable housing sites within the Plan. As a result of this decision we therefore consider that the LDP as it stands is “unsound” and fails to meet the required Tests of Soundness. As detailed, this is particularly worrying, in view of the lack of deliverable allocations within the Principal Tier of which the Alternative Strategic Site forms part of (please see below).

We consider therefore that all the land edged red in Plan A, should be allocated for mixed use development under the provision of Policy HOM1 and SPG1 of the Carmarthenshire Local Development Plan.

This formal representation letter supplements the following documents which comprise a complete submission to the 2nd Deposit LDP Consultation stage:

- Completed Deposit LDP Representation Form
- Completed Integrated Sustainability Appraisal form
- Copy of Candidate Site Submission Report and associated Plans

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

Sufficient Residential Land Allocated Within Settlement

As detailed above, we are deeply concerned with the Council’s decision to reduce the proposed housing allocation in question, and understand that this may be because the Council holds the view that alternative allocations within Penygroes and the wider Principal Centre it forms part of will deliver sufficient housing for the area during the Plan period. This is in our view wholly incorrect.

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 2nd 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:

Ref. No.	Site Name	Units
PrC3/h4	Tirychen Farm	150
PrC3/h36	Betws Colliery	60
PrC3/h14	Nantdydderwen, 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 Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.

In conclusion, this Representation to the 2nd Deposit Draft of the Revised LDP has sought to examine the Council's reasons for non-allocation of the whole of the Candidate Site. It has successfully addressed the reasons put forward by the Authority for its exclusion and has highlighted that the reason 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 2nd 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 in its entirety as part of the Carmarthenshire Local Development Plan to ensure that the document passes all the relevant tests of soundness.

Yours sincerely,



Jason D Evans

Director