

Our Ref.: 1035.a

Date: 31st March 2023

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

Dear Forward Planning,

**Carmarthenshire Local Development Plan 2018-2033 – Second Deposit Draft
Objection on Behalf of Mr H. & Mrs N. M. Evans
Land part of Danycapel, Rhydargaeau**

We are instructed by Mr H. & Mrs N.M. Evans to make a formal representation to the “soundness” of the Deposit Draft of the Carmarthenshire Local Development Plan.

Our client made a formal Candidate Site Submission in August 2018, which was referenced **SR/145/011**, seeking the inclusion of the land within the defined development limits of Rhydargaeau as part of the Replacement Local Development Plan. The Candidate Site centred mainly on part an agricultural paddock that fronted onto the A485 Carmarthen to Lampeter Road, within the northern cluster of development that forms the settlement. Further agricultural enclosures are positioned to the south-east, but residential development is located directly to the land’s north and on the opposite side of the main road to the west. The site is also within walking distance to the range of community facilities and local services the settlement has to offer, as well as well serviced bus stops that provide access to those services and facilities in the wider growth area of Carmarthen, which is only some 10 minutes by road.

The Council have published a “Site Assessment Table” (January 2023) which provides details of the Council’s analysis of each received Candidate Site submission, and in the case of our clients’ submission, reasons why the site was not selected for inclusion within the settlement limits of Rhydargaeau, as contained within the Second Deposit Draft.

We note that the submission successfully passed through Stage 1 (site compatible against the location of future growth presented in the Preferred Strategy) and Stage 2A (Initial Detailed Site Assessment) of the Council’s site assessment.

However, it was rejected at Stage 2B (further detailed site assessment), with reasons for non-inclusion reported as follows:

“Development of the site would have a detrimental impact on the character and setting of the settlement. Furthermore, there is sufficient and more suitable land available for development within the village to accommodate its housing need.”

Our clients consider that the LDP is “unsound” and should be changed, as it fails to meet the tests for “soundness,” in that the Plan “is not appropriate,” as defined by the Planning Inspectorate’s LDP Examinations Procedural Guidance.

Specifically, our clients consider that the Second Draft settlement limits for Rhydargaeau, as defined under Policy SD1 “Settlement Limits”, **should be amended to include the land as edged in red upon the extract of the Proposals Map for Rhydargaeau, as reproduced below in Figure 1.**

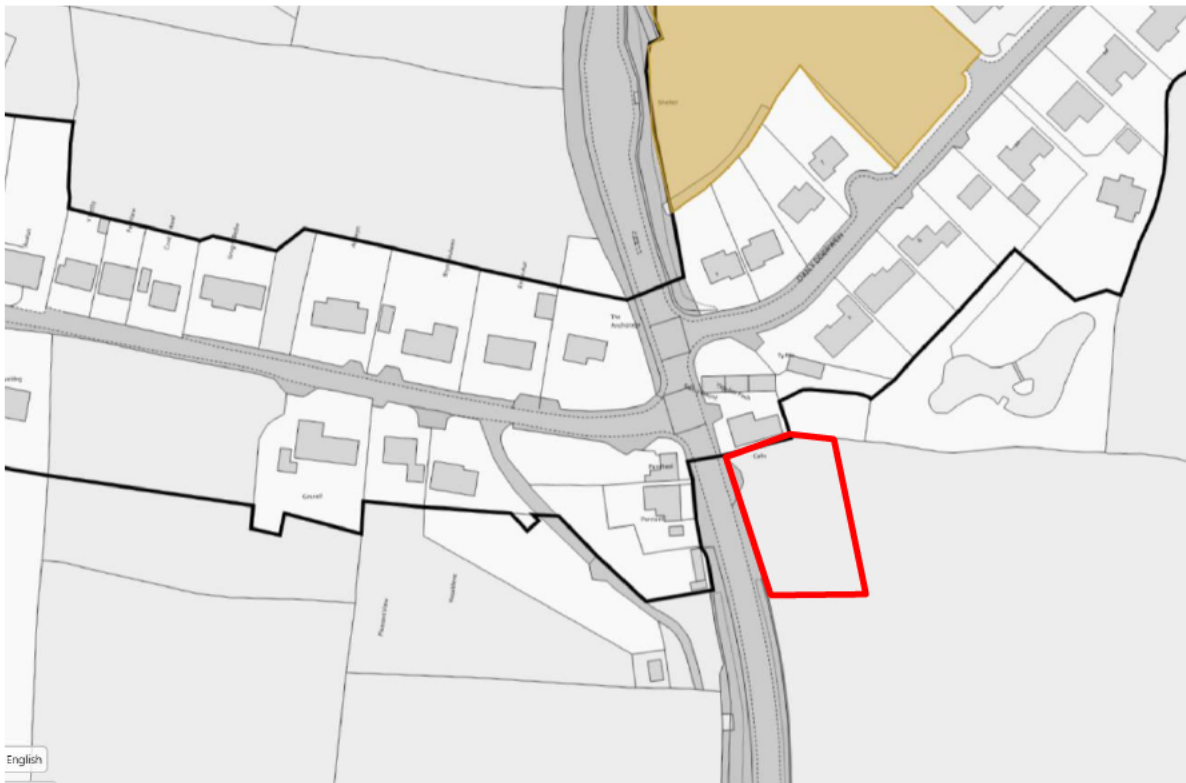


Figure 1 - Extract from Proposals Map with Representation site edged in red

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

- Completed Deposit LDP Representation Form
- Completed Sustainability Appraisal form

Response to Council's Reasons for Non-Inclusion of Site within Settlement Limits

1.0 Impact upon Character and Setting of the Settlement

- 1.1 The Council consider that the inclusion of the site within defined settlement limits would “have a detrimental effect on the character and setting of the settlement.” In response, it is abundantly clear from the submitted indicative site layout plan, as reproduced at Figure 1 below, that the proposals constitute “rounding off”. The proposals will seek to develop an established and delineated paddock, the boundaries of which are marked upon the Ordnance Survey Map and will bring development about the eastern flank of the A485 road in comparison to that established off the opposite, western flank. We question how that can be described as “detrimental” when the western flank is already in existence?

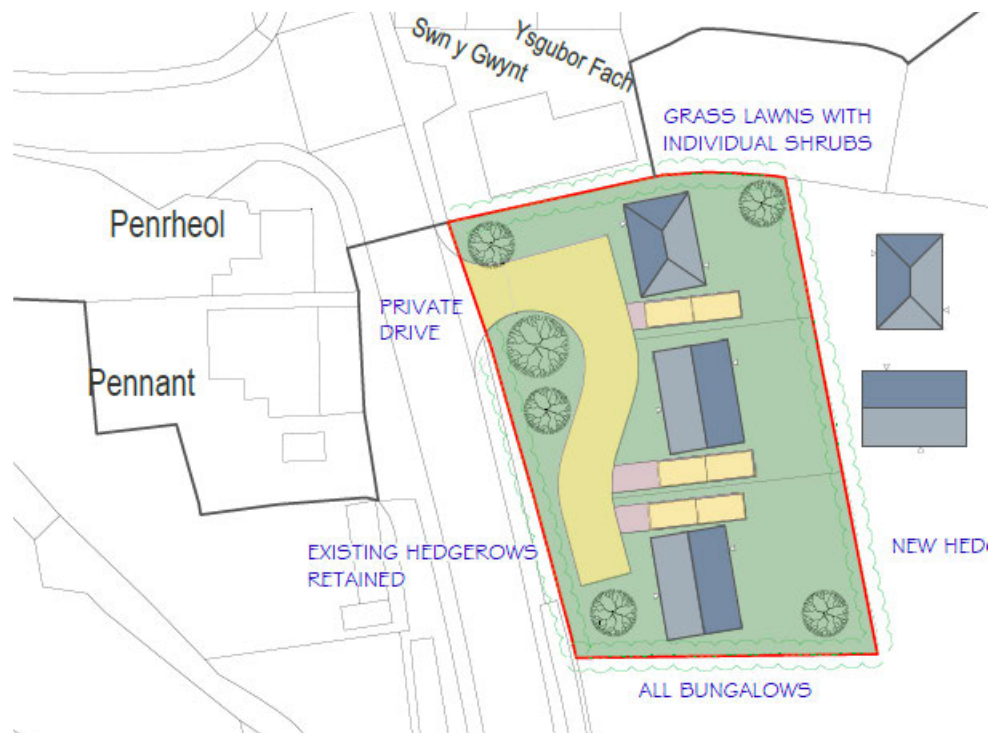


Figure 2 – Indicative Site Layout Plan of Representation Site

- 1.2 Policy HOM3 deals with small extensions to existing rural villages and so provides a useful series of criteria in determining where such extensions would be acceptable, namely the following:

- Minor infill or a small gap between the existing built form; or
- Logical extensions and/or rounding off of the development pattern that fits in with the character of the village form and landscape; or

It is logical therefore that the same assessment criteria should be utilised in assessing whether or not a candidate site would make an acceptable addition to

existing development limits. Taking our client's land into consideration, together with the actual 'on-the-ground' physical attributes of adjoining and nearby land and its use, it is clear that it would adhere to the second criteria listed above and so should in turn have been included within the defined development limits of Rhydargaeau. The land in question if developed with a small number of dwellings would appear as a "mirroring" of established development off the opposite side of the main road. Its exclusion would be inconsistent with the provisions of Policy HOM3 and indeed decisions taken by the Authority with regard to other sites within the Plan area. As a result, and on this basis alone, the Plan as it currently stands is unsound.

2.0 Consistency with Other Settlement Limits

2.1 Consistency in approach and application is critical in order for the planning system to be both effective and credible to all its users. Without it, the system itself becomes unsound and in the case of the determination of the development limits for Rhydargaeau, the Authority has been found to be inconsistent.

Figure 3 below is an extract of the Deposit LDP Proposals Maps for an area at the south of Rhydargaeau.

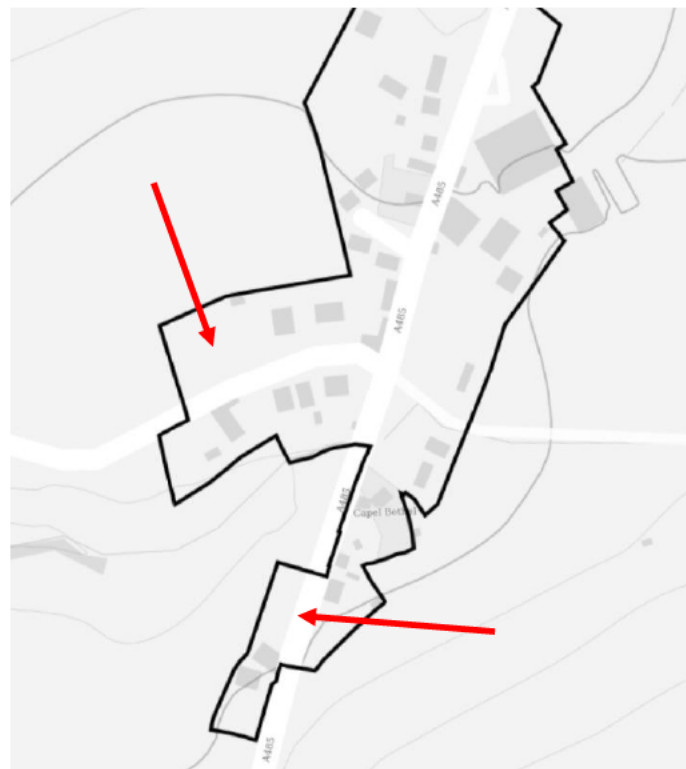


Figure 3 – examples of undeveloped land at settlement edge marked with red arrows

2.2 As can be seen, two separate parcels of undeveloped land have been included within the defined Rhydargaeau development limits, which extend the existing form of the settlement in a southern 'ribbon-like' manner. It should be noted that we do not object to this form of alteration to the development limits, as it secures a varied form of available housing development opportunities for a community. However, its inclusion

is a direct contrast and inconsistency to the Authority's decision to exclude our client's land from the development limits. Combined with our Client's land representing a logical rounding-off of the respective area of the settlement, the exclusion of it would represent a clear inconsistency in approach taken by the Authority, resulting in the Plan as it stands being unsound.

- 2.3 The practice of illogical addition of undeveloped land at nearby village fringes has continued at Peniel, where land at Aberddaudwr has been added, as shown below at Figure 4. This inclusion of this parcel of land exhibits a complete departure of extending the settlement limits off the eastern flank of the A road, without any definitive barrier such a hedgerow or tree line to mark as a physical barrier to the settlement.



Figure 4 – illogical extension of settlement limits at Peniel

- 2.4 The expansion of settlement limits to mirror development off an opposite road flank is not confined to Peniel. Figure 5 below shows a recent addition to settlement limits at Bronwydd, where land off the western side of the B4333 Llanpumsaint Road has been added in this Second Draft of the LDP. This is another example of the inconsistent approach taken by the Authority in examining modest representations within villages north of Carmarthen.



Figure 5 – expansio of settlement limits at Bronwydd in mirroring development off an opposite road flank

In conclusion, this Representation to the Deposit Draft of the Revised LDP has sought to examine the Council's reasons for non-inclusion of a Candidate Site within the defined development limits. It has successfully addressed the reason put forward by the Authority for its exclusion and highlighted that its continued exclusion would represent a dangerous inconsistency. We therefore respectfully request that this Representation be given careful examination, and consequently the land in question be included within the defined development limits as part of the Carmarthenshire Local Development Plan to ensure that the document passes all the relevant tests of soundness.

Yours sincerely,

[Redacted signature]

Richard A. Banks
Director

Enc.

Cc clients