

Our Ref: EBP/HOM1 (PrC3/h36)

Date: 27th 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 PrC3/h36 – Betws Colliery, Betws, Ammanford**

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 of **Betws Colliery, Betws (LDP Ref. No. PrC3/h36)** 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 66 residential units.



Plan A

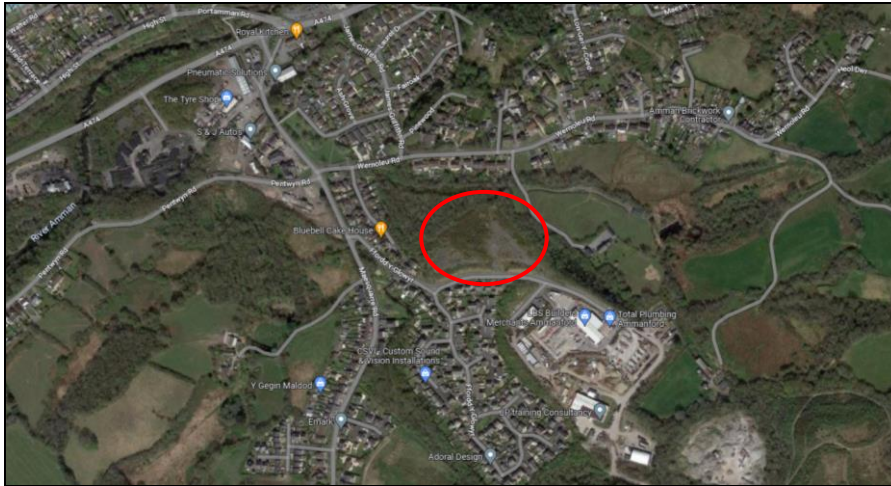
(Extract of Proposal Map for Betws and Betws Colliery Allocation)

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 PrC3/h36 was considered as part of this process and as a result the Council concluded as follows:

“Part of the site to be retained as a residential allocation, with site reference PrC3/h36. The site has partly been developed.”

It is clear from the above therefore that the Council considers that the site is deliverable for the purposes of 60 houses, although it is not clear on what basis this conclusion has been made. This is particularly as whilst the southern part of the former allocation site (south of Ffordd y Glowyr) has been developed, the remaining element (Allocation PrC3/h36) continues to remain undeveloped.

The allocation itself is brownfield in nature and is currently in an overgrown state. The topography of the site slopes gradually from east to south. The site is surrounded by mature woodland to the north and to the west with Ffordd y Glowyr making up the southern boundary, as can be seen from the aerial photograph below (allocation circled red).



Photograph 1
(Extract from Google Earth – June 2021)

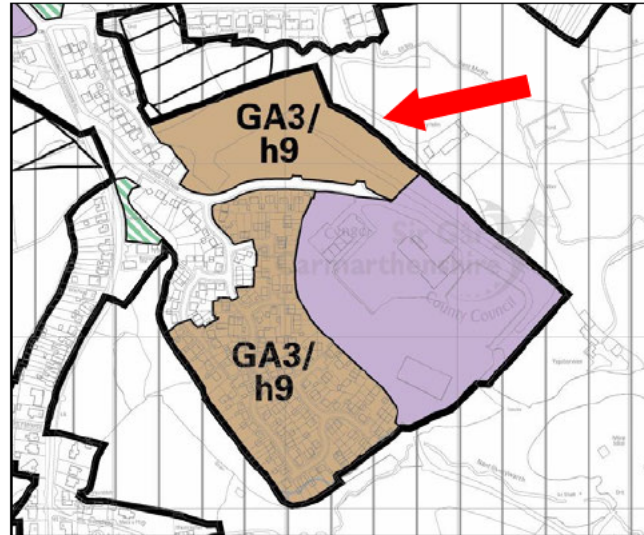
Access to the site is currently gained off Ffordd y Glowyr (see below), which leads to an industrial estate located some 100 metres south from the allocation.



Photograph 2
(streetscene of Ffordd y Glowyr)

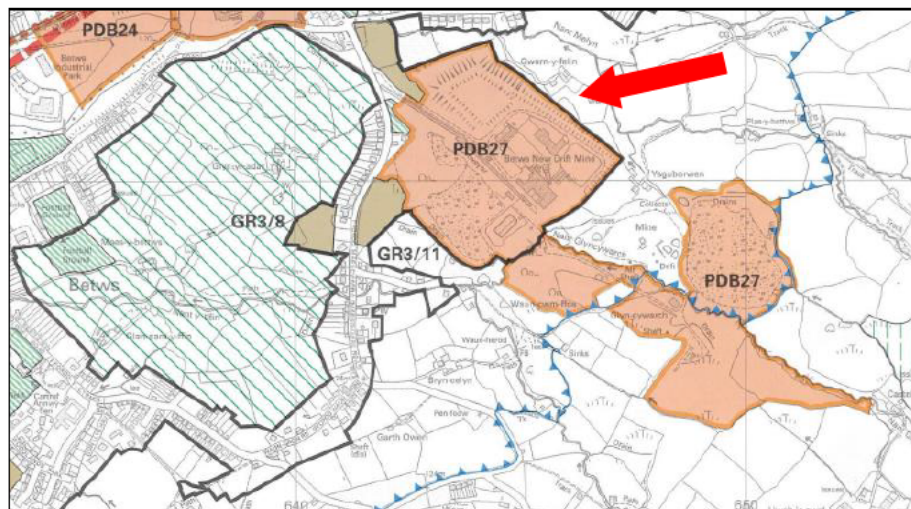
Outline planning permission was first granted for residential development on the allocation as far back as **2005** (Application E/09584), with reserved matters being granted in 2011 (Application E/24724). Since then, a Non-Material Amendment (Application PL/04568) has been granted in September 2022 for the 'Removal of chimneys and raising the height of window sills'.

The site was allocated in the *Carmarthenshire Local Development Plan (2014)* as part of a larger allocation (GA3/h9), and Allocation PDB27 of the *Carmarthenshire Unitary Development Plan (2006)*, which included the land south of Ffordd y Glowyr (as can be seen below).



Plan B

(Extract of current LDP proposal map for Betws Colliery (Adopted 2014))



Plan C

(Extract of Carmarthen UDP Proposal Map for Allocation Site (Adopted 2006))

The southern part of the historic allocation has been delivered however, despite having almost 20 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