

Our Ref: EBP/HOM1 (SuV63/h1)

Date: 29th March 2023

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

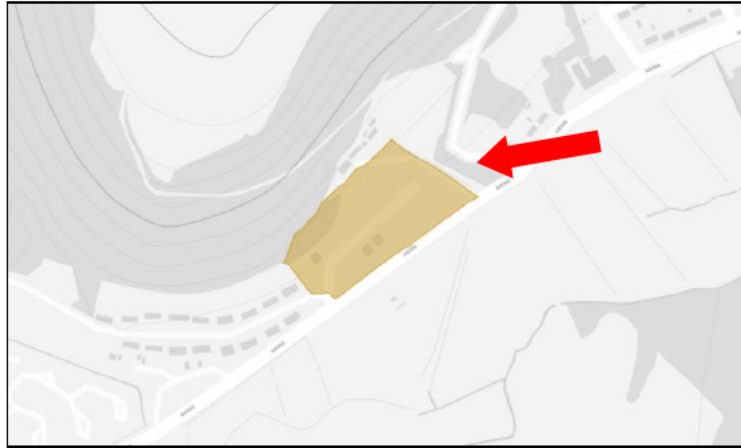
Dear Sir,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft
Objection to Policy HOM1 on behalf of Evans Banks Planning Ltd
Site SuV63/h1 – Land at Woodend, Llanmiloe**

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 at Woodend, Llanmiloe (LDP Ref. No. SuV63/h1)** 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 28 residential units.



Plan A

(Extract of Proposals Map for Llanmiloe and Land at Woodend 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 SuV63/h1 was considered as part of this process and as a result the Council concluded as follows:

“The site is under construction with a road and plot layout developed for self build development. Site to be allocated with reference SuV63/h1.”

It is clear from the above that the Council considers that the site is deliverable for the purposes of 28 houses. However, it is unclear as to the sustainability of the development of self build plots for the purposes of the proposed Local Development Plan, or the reliability that all plots will be completed during the plan period.

The allocation is brownfield in nature with its topography being relatively level in the southern half of the allocation while the northern half slopes drastically from north to south. The southern boundary of the allocation is bordered by the A4066, as can be seen from the aerial photograph below (outlined in red below).



Photograph 1
(Extract from Google Earth – June 2021)

Access to the allocation is currently gained via the A4066, that being the main road running between the villages of Pendine and Llanmiloe (see below).



Photograph 2
(Streetscene of Allocation Site)

Outline Planning Permission was granted for “*Residential Development, together with associated vehicular and pedestrian accesses, car parking, landscaping and ancillary development: site preparation, clearance, treatment, re-profiling and the installation of new services and infrastructure*” on the site in February 2016, under application reference W/32544. Since this date, individual plots have sought planning permission for their construction.

The site was allocated in the *Carmarthenshire Local Development Plan (2014)* under Allocation SC13/h3 as well as the Carmarthenshire Unitary Development Plan (Allocation PDB41) as can be seen below.



Plan B

(Extract of current LDP Proposal Map for Land at Woodend (Adopted 2014))



Plan C

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

Despite having almost 20 years of support for the principle of residential development at the historic allocation from the Council, **only 3 housing units have been delivered to date** on a site allocated for 28.

Given that the first plot was developed in 2019, and that to date there, are a total of 3 houses that have been developed on the site, it seems that there has been a single plot developed for each following year. At that build rate, it would take an estimated 25 years to complete the site therefore going beyond the proposed plan period. It is for this reason that the site should not be deemed as deliverable and that the allocation should be removed.

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 due to its inappropriateness with regards to the principles of sustainable growth and so 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