

Our Ref: EBP/SD1

Date: 6th April 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
Objection to Policy SD1 on behalf of Evans Banks Planning Ltd**

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, including in relation to the provisions of part of **Policy SD1 (Development Limits)**. As a result, we offer the following for the Authority’s consideration, and Inspector’s in due course.

Through the provisions of Policy SD1, ‘development limits’ have been defined for all settlements within Tiers 1, 2 and 3 of the Settlement Framework. The Policy then sets out that “*Proposals within defined Development Limits will be permitted, subject to policies and proposals of this Plan, national policies and other material planning considerations.*”.

The Policy’s supporting text goes on to set out four situations that have influenced how the proposed development limits have been set, with the first reading as follows: “*Prevent inappropriate development in the countryside and provide certainty and clarity as to where exceptions proposals (adjacent to limits) may be considered appropriate;*”. In order to ensure ‘certainty’ and ‘clarity’ from the Policy (and in turn ‘soundness of the Plan), there is an assumption that all settlement limits have been drawn correctly and logically. However, as

has been seen from the numerous submissions made as part of the current consultation process with regards to the proposed settlement limits, this is not the case.

The submissions made on behalf of our Clients with regards to Policy SD1 and specific areas of land, and those made by other parties, highlights that the level of 'clarity' and 'certainty – and indeed confidence – that Policy SD1 has sought to secure, has not been achieved. The submissions highlight that residential gardens (as a whole or in part), natural infill plots and often domestic outbuildings have been illogically excluded from proposed settlement limits and in doing so, labelling them 'open countryside'. As the aforementioned submissions clearly show, these areas of land and buildings are certainly not part of the 'open countryside' nor do they share their characteristics, and so should in fact be included within the defined development limits. However, under the current wording of Policy SD1 the above situations will in turn create confusion, with areas that quite clearly form a logical part of a settlement, in fact being defined by Policy SD1 as lying outside of it.

In order to secure greater consistency and clarity, it is proposed that Policy SD1 should be amended – either as part of its core text or supporting text – to allow for a 'case by case' assessment of the suitability of small areas of land or property for development at 'edge of settlement' locations. It is proposed that this could be done by including the same form of locational criteria as used by Policy HOM3, which are as follows:

- minor infill of 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 settlement form and landscape; or
- conversion or the sub-division of large dwellings.

The above would then ensure that all edge of settlement locations with regards to appropriate development are assessed in a consistent and clear manner, compensating for any such instances that the Deposit Plan has done so in an erroneous manner.

We therefore respectfully request that this Representation be given careful examination, and that the above wording and provision should be included as part of Policy SD1 to ensure that the Plan adheres to the requirements of all three Tests of Soundness.

Kind regards

A solid black rectangular box used to redact the signature of Jason D Evans.

Jason D Evans
Director