

**Our Ref:** EBP/HOM1 (SeC18/h1)

**Date:** 28<sup>th</sup> March 2023

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

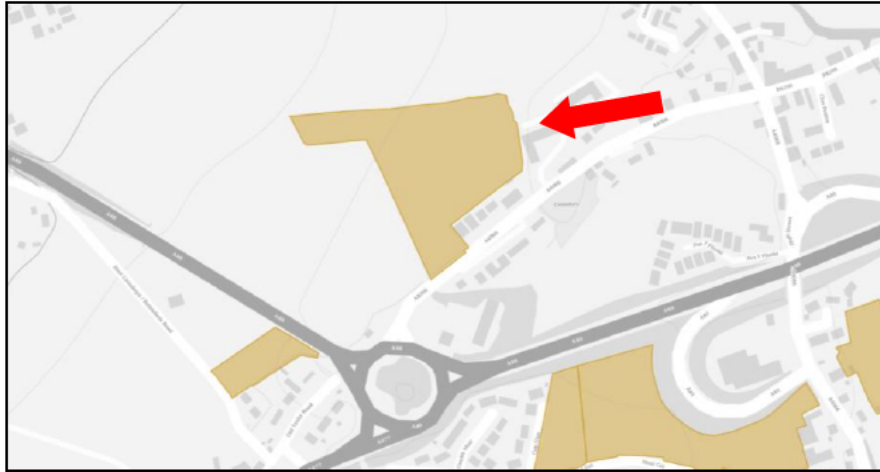
Dear Sir,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft  
Objection to Policy HOM1 on behalf of Evans Banks Planning Ltd  
Site SeC18/h1 – Land Adjacent to Brittonia Terrace, St Clears**

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 **Adjacent to Brittonia Terrace, St Clears (LDP Ref. No. SeC18/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 2<sup>nd</sup> Deposit LDP for the purposes of 60 residential units.



**Plan A**

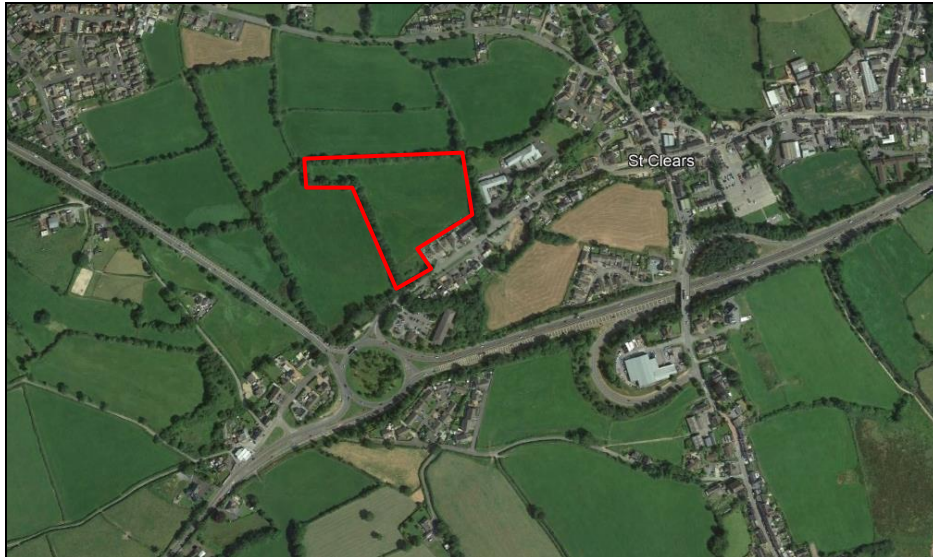
**(Extract of Proposals Map for St Clears and land Adjacent to Brittania Terrace Allocation)**

As part of the current consultation process into the 2<sup>nd</sup> 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 SeC18/h1 was considered as part of this process and as a result the Council concluded as follows:

*“Whilst the site has been included in previous development plans, its connection to the adjacent site and a potential dual access point could see this site being brought forward. Site to be allocated with reference SeC18/h1.”*

It is clear from the above that the Council considers that the site is deliverable for the purposes of 60 houses. However, it is unclear as to why and what evidence the Council has received to believe beyond doubt that the sites “...connection to the adjacent site...” provides absolute confidence that the site will be delivered.

The allocation is greenfield in nature with its topography being relatively level while gradually sloping from west to east. Much of the perimeter of the allocation is covered with mature vegetation, trees and hedgerows, as can be seen from the aerial photograph below (outlined in red below).



**Photograph 1**  
**(Extract from Google Earth – June 2021)**

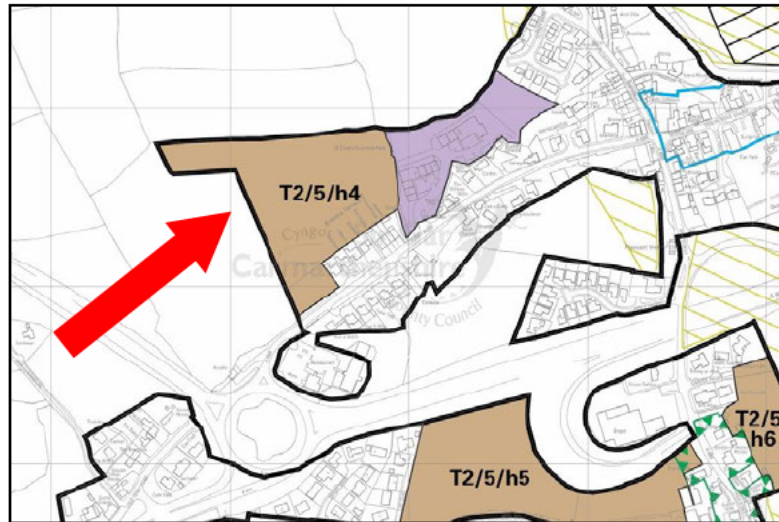
Access to the allocation is currently gained via an access road off Tenby Road, that being the main road running east to west through St Clears (see below).



**Photograph 2**  
**(Streetscene of Access to Allocation Site)**

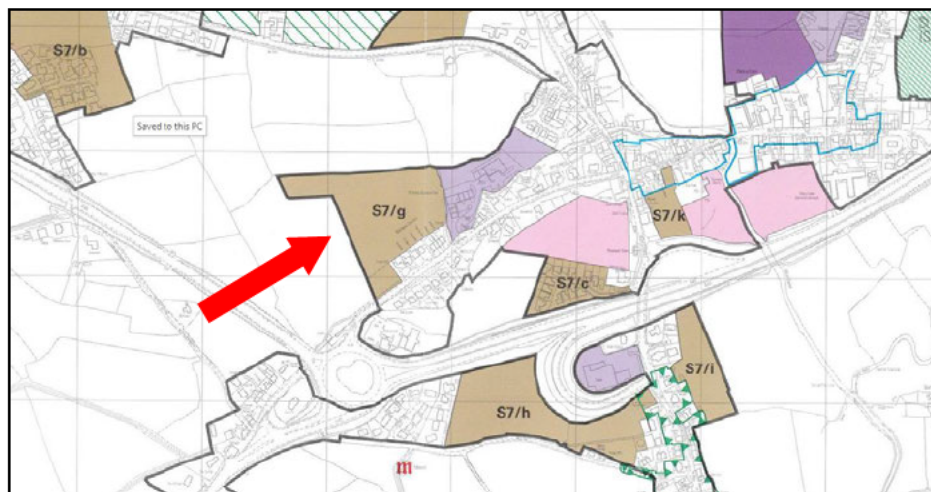
Outline Planning Permission was granted in 2010 for *Residential Development including Affordable Units (W/21675)*. In both 2013 and 2014, Variation of Conditions for an extension of time for the outline planning permission were granted, but no further applications have been made relating to the allocation site since 2014.

The site was allocated in the *Carmarthenshire Local Development Plan (2014)* under Allocation (T2/5/h4), and previously under Allocation S7/g of the *Carmarthenshire Unitary Development Plan (2006)* (as can be seen below).



**Plan B**

**(Extract of current LDP Proposal Map for land Adjacent to Britannia Terrace (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, **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**