[redacted]
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Our Ref: EBP/HOM1 (PrC2/h4) **Date:** 5th April 2023

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

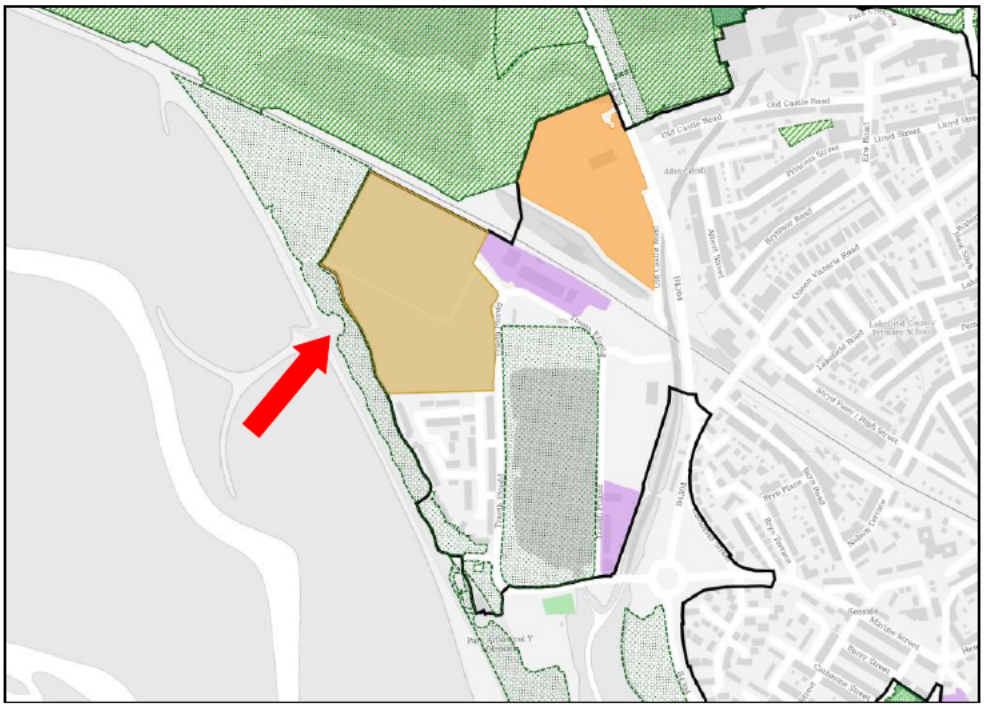
Dear Sir,

Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft
Objection to Policy HOM1 on behalf of Evans Banks Planning Ltd
Site PrC2/h4 – North Dock

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 **North Dock (LDP Ref. No. PrC2/h4)** 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 210 residential units.



Plan A

(Extract of Proposals Map for North Dock 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 PrC2/h4 was considered as part of this process and as a result the Council concluded as follows:

"Site to be retained as an allocation - but specifically for residential development as opposed to mixed use as a reflection of planning application S/38285. The development limits in the vicinity will be amended so that they are drawn tightly around the allocation. Site to be allocated (based on S/38285) with reference PrC2/h4."

It is clear from the above that the Council considers that the site is deliverable for the purposes of 210 houses, although it is not clear on what basis this conclusion has been made. We suspect it is purely upon an outline permission granted by the Council as Local Planning Authority also acting as landowners.

The allocation is brownfield in nature with its topography being generally level. The southern perimeter of the site is bordered by residential properties while the western boundary is

bordered by Llanelli Beach. The northern boundary is bordered by a train line as can be seen from the aerial photograph below (outlined in red below).

Photograph 1

(Extract from Google Earth – June 2021)

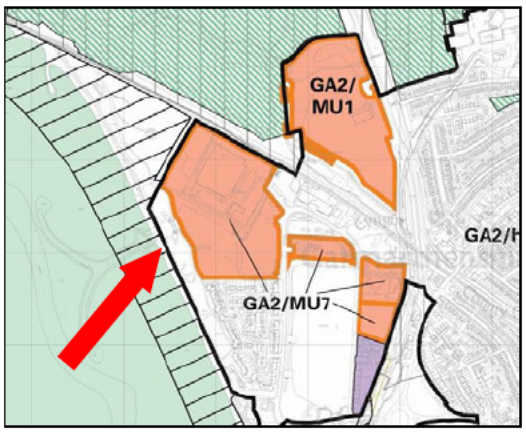
Access to the allocation is currently gained off Traeth Ffordd, that being the road that surrounds Llanelli's North Dock (see below).

Photograph 2

(Streetscene of Traeth Ffordd)

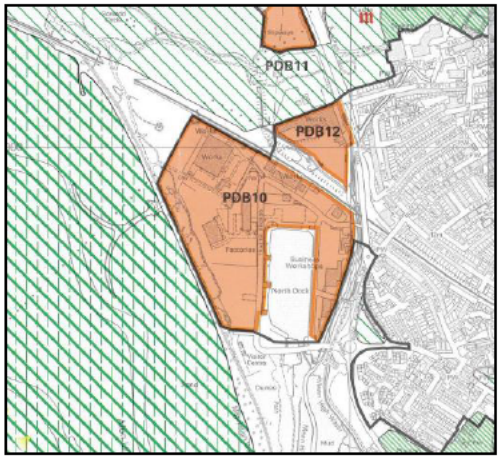
Outline Planning Permission was granted in 2021 for the *Construction of a residential development of up to 210 units with associated landscaping and infrastructure works (S/38285).* However there have been no applications made to further this development to date.

The site makes up part of an allocation in the *Carmarthenshire Local Development Plan (2014)* under Allocation GA2/MU7 as well as the *Carmarthenshire Unitary Development Plan* (2006) under allocation PDB10 as can be seen below. Mixed uses of Housing, Employment and Leisure were promoted in those plans, but without firm planning permissions being secured. We find this surprising given the fine coastal position of the site adjoining a high quality housing development.



Plan B

(Extract of current LDP Proposal Map for Beech Grove (Adopted 2014))



Plan C

(Extract of Carmarthenshire UDP Proposal Map for Beech Grove (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.**

We are led to believe that the is also **no active marketing strategy** for the development and the Council being the landowners are merely seeking to secure an outline permission on their own land asset.

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

[redacted] [redacted]

Richard Banks

Director

Jason Evans

Director