

Our Ref: EBP/HOM1 (SeC6/h2)

Date: 6th 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 SeC6/h2 – Land between Clayton Road and Bronallt Road, Hendy**

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 **Between Clayton Road and Bronallt Road, Hendy (LDP Ref. No. SeC6/h2)** 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 20 residential units.



Plan A

(Extract of Proposals Map for Land Between Clayton Road and Bronallt Road 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 SeC6/h2 was considered as part of this process and as a result the Council concluded as follows:

“Site to be retained as a residential allocation as an integrated scheme with site T3/7/h5 below. Reference is made to SR/069/009 below. Site to be allocated as an integrated scheme within the revised LDP with reference SeC6/h2.”

It is clear from the above that the Council considers that the site is deliverable for the purposes of 20 houses, although it is not clear on what basis this conclusion has been made.

The allocation is greenfield in nature with its topography sloping gently from north to south. The northern, eastern and western perimeters of the site are bordered by residential properties. The southern boundary is then bordered by further open pasture 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 Bronallt Road, that being a residential street running north to south through Hendy (see below).

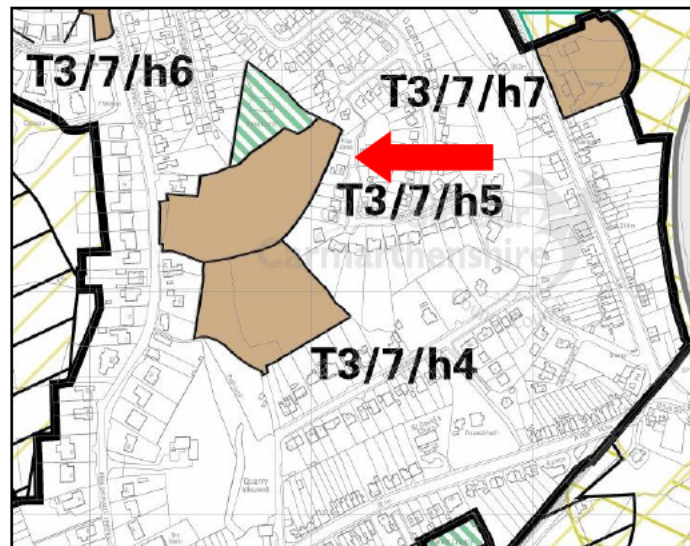


Photograph 2
(Streetscene of Bronallt Road)

Full Planning Permission was granted in April 2018 for the *Construction of 8 houses together with associated vehicular and pedestrian accesses, car parking, landscaping, drainage and other ancillary development (S/34537)*. However, to our understanding, this development is

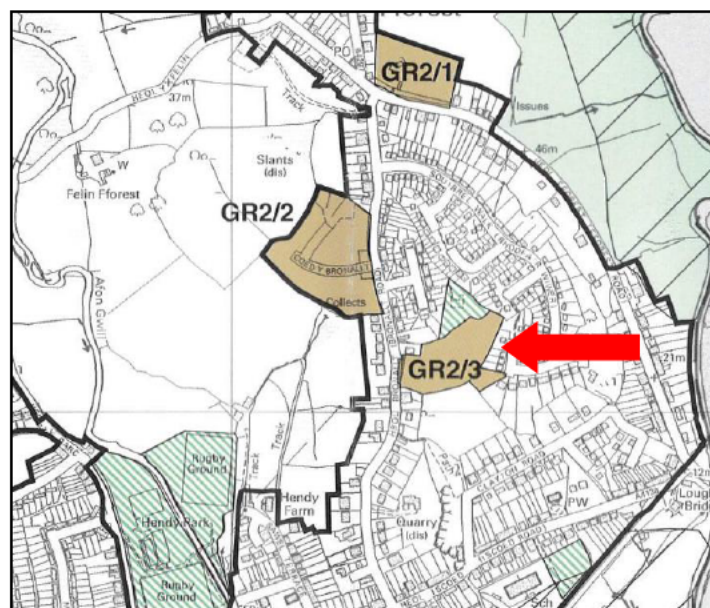
yet to be completed. The application also **only relates to part of the allocation, with no application** made to the remainder of the site.

The site is allocated in the *Carmarthenshire Local Development Plan (2014)* under allocation T3/7/h5 as well as the *Carmarthenshire Unitary Development Plan (2006)* under allocation GR2/3 (as can be seen below).



Plan B

(Extract of Current Carmarthenshire LDP Proposal Map for Allocation Site (Adopted 2014))



Plan C

(Extract of Carmarthenshire 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 5 housing units has been delivered to date** to a site allocated for 20 units. It is submitted that only 8 units should be allocated at this site to reflect the extent planning permission and the remainder omitted in the same manner as the Council omitted T3/7/h4 in the last Site Assessment Review.

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