

Our Ref: EBP/HOM1 (SeC17/h1)

Date: 4th April 2023

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

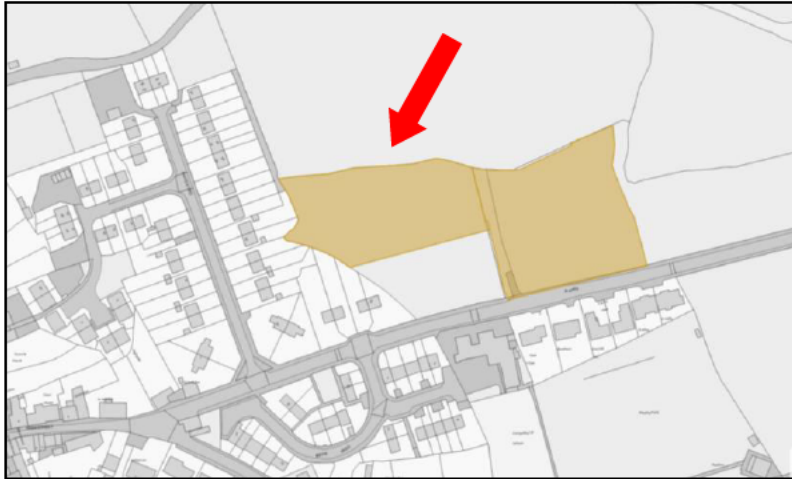
Dear Sir,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft
Objection to Policy HOM1 on behalf of Evans Banks Planning Ltd
Site SeC17/h1 – Land opp. Llangadog C.P. School**

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 opp. Llangadog C.P. School (LDP Ref. No. SeC17/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 16 residential units.



Plan A

(Extract of Proposals Map for Llangadog and Land opp. Llangadog C.P. School 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 SeC17/h1 was considered as part of this process and as a result the Council concluded as follows:

“Part of site taken up by a school car park. Remainder of site S/090/003 to be allocated for residential development with reference SeC17/h1.”

It is clear from the above that the Council considers that the site is deliverable for the purposes of 16 houses, although it is not clear on what basis this conclusion has been made.

The allocation is greenfield in nature with its topography being relatively level. The northern, eastern and western perimeters of the allocation are covered with mature vegetation, trees and hedgerows. The southern boundary is bordered by the schools car park as can be seen from the aerial photograph below (outlined in red below) as well as Photograph 2 below.



Photograph 1
(Extract from Google Earth – June 2021)

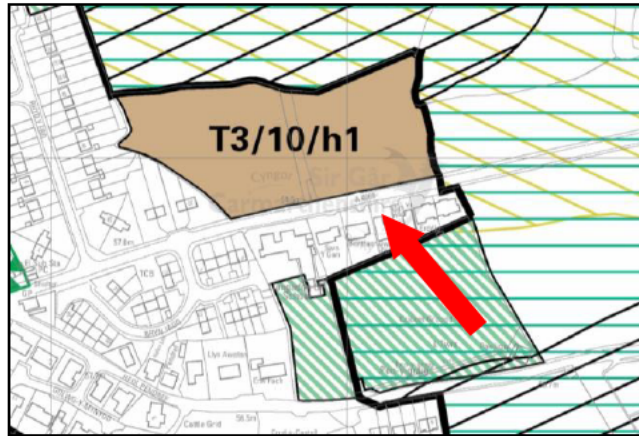
Access to the allocation is currently gained via the A4069, that being the main road running through Llangadog (see below).



Photograph 2
(Streetscene of Access to Allocation Site)

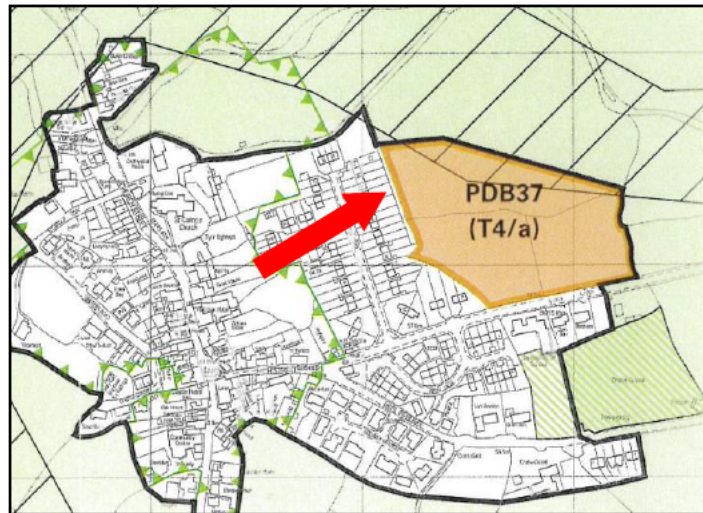
There have been **no planning applications** made in relation to the allocation in question to date.

The site makes up part of an allocation in the *Carmarthenshire Local Development Plan (2014)* under Allocation (T3/10/h1), and previously under Allocation T4/a of the *Carmarthenshire Unitary Development Plan (2006)* (as can be seen below).



Plan B

(Extract of current LDP Proposal Map for Land opp. Llangadog C.P. School (Adopted 2014))



Plan C

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

Whilst we do not object to the principle of the allocation for residential development, we do object to the number of units assigned to the allocation. Based on our experience elsewhere in areas affected by the phosphate regulations, sites within sewered areas have to forfeit 25% of their site area to accommodate the necessary foul water treatment infrastructure. When this and the requirements for a SUDS scheme are taken into account, it is clear that 16 units on the allocation is undeliverable and that a lower number of between 10-12 should be assigned.

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 to the level expected 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 to the level indicated** 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 the level of new housing it is expected to.

In summary, we **object** to the inclusion of the allocation for housing 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

