

**Our Ref:** EBP/HOM1 (SeC14/h1)

**Date:** 30<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

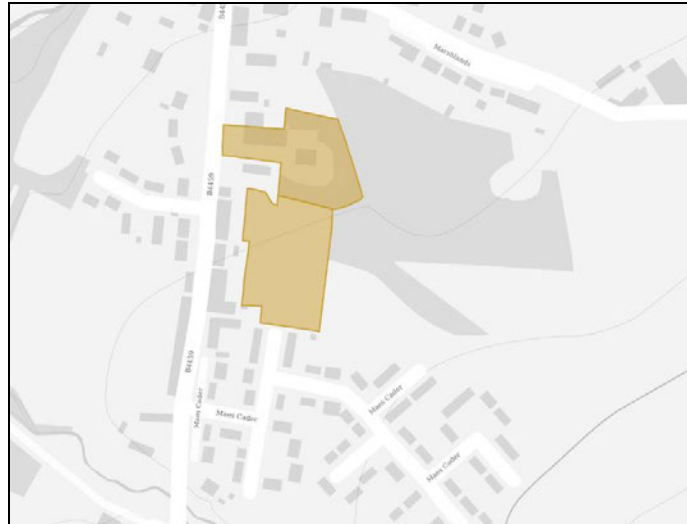
Dear Sir,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft  
Objection to Policy HOM1 on behalf of Evans Banks Planning Ltd  
Site SeC14/h1 – Blossom Garage, Pencader**

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 **Blossom Garage, Pencader (LDP Ref. No. SeC14/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 Proposal Map extract below and is proposed for the allocation in the 2<sup>nd</sup> Deposit LDP for the purposes of 20 residential units.



### **Plan A**

#### **(Extract of Proposal Map for Pencader and Blossom Garage 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 SeC14/h1 was considered as part of this process and as a result the Council concluded as follows:

*“Site to be allocated for residential use with reference SeC14/h2.”*

It is clear from the above therefore 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. However, on both the LDP 2<sup>nd</sup> Deposit Written Statement and the Proposal Map, this allocation is referenced as SeC14/h1 - that being separate to the adjoining SeC14/h2.

The allocation itself is brownfield in nature and is currently a large garage/workshop known as ‘Blossom Garage’. The topography of the site is then generally level. The northern and eastern boundaries of the site are bordered by mature vegetation and trees while the western boundary is bordered by the B4459. Directly to the south is a separate housing allocation referenced SeC14/h2, as can be seen from the aerial photograph below (allocation outlined red).



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

Access to the allocation is currently gained via the B4459, that being the main road running north to south through Pencader (see below).



**Photograph 2**  
**(Streetscene of B4459)**

A Full Planning Application was made to the Council for the *Proposed Residential Development of 16 Dwellings with Access and Parking (W/39283)* which was subsequently refused in August 2019. The application was refused for a number of reasons including the applicant not signing a Section 106 agreement as well as the site being within a Special Area of Conservation (Afon Teifi). The failure of the applicant to commit to signing the S106 Agreement in itself puts the deliverability of the site in serious doubt.

The site has not been allocated in either the *Carmarthenshire Local Development Plan (2014)* or the *Carmarthenshire Unitary Development Plan (2006)* for the purposes of residential development.

Despite seeking permission for the residential development of 16 dwellings, the application was refused and therefore **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?**

An application has been made relating to the allocation in question, however, the application was refused for a number of reasons including the applicant not signing a Section 106 agreement as well as it being within a Special Area for Conservation. This indicates that the allocation is **not deliverable** as a site for residential development.

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**