

**Our Ref:** EBP/HOM1 (PrC1/h4)

**Date:** 4<sup>th</sup> 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 PrC1/h4 – Land off Parc y Delyn**

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 off Parc y Delyn (LDP Ref. No. PrC1/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 2<sup>nd</sup> Deposit LDP for the purposes of 17 residential units.



**Plan A**

**(Extract of Proposals Map for Carmarthen and Land off Parc y Delyn 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 PrC1/h4 was considered as part of this process and as a result the Council concluded as follows:

*“Site to be allocated with reference PrC1/h4.”*

It is clear from the above that the Council considers that the site is deliverable for the purposes of 17 houses, although it is not clear on what basis this conclusion has been made.

The allocation is greenfield in nature with its topography sloping gradually from north to south. The eastern perimeter of the allocation is bordered by the Parc y Delyn residential estate while the remaining borders adjoin further greenfield land as can be seen from the aerial photograph below (outlined in red below).



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

Pedestrian access to the allocation is currently gained via Parc y Delyn, that being off Penlan Road (see below).



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

There are also 2 trees located at the access to the site that have Tree Protection Orders (TPO) placed upon them with reference W13 as can be seen in Photograph 3 below. This would therefore indicate that an adoptable road to serve the Allocation would be impossible, which in itself would question its deliverability.



**Photograph 3**  
**(Map Showing TPO's in area)**

### **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. Given the important biodiversity features of the site and the two TPO's at the sites

access point meaning that the site would not be accessible by vehicles, the allocation in question would not be fit, nor sustainable for residential allocation.

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**