



CARMARTHENSHIRE REPLACEMENT LOCAL
DEVELOPMENT PLAN
EXAMINATION IN PUBLIC STAGE

STATEMENT OF OBJECTION

PROPOSED ALLOCATION PrC3/h14
LAND AT NANTYDDERWEN, DREFACH

On behalf of
Evans Banks Planning Ltd

Our Ref: PrC3/h14/EBP
EiP Rep. No.: 4967
Date: September 2024
Prepared by: RAB

Representation No.: 5067

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1.0 INTRODUCTION

1.1 This Statement has been prepared by Evans Banks Planning Limited on behalf of its Clients as a continued objection to the proposed allocation of land at Nantydderwen, Drefach (LDP Ref. No. PrC3/h14) as part of the *Carmarthenshire Replacement Local Development Plan* (LDP). This Statement has been prepared in advance of our attendance of the relevant session of the Examination in Public and has been prepared in response to the Inspector's issued '*Matters, Issues and Questions*' document. The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Revised Deposit stage, which still stand.

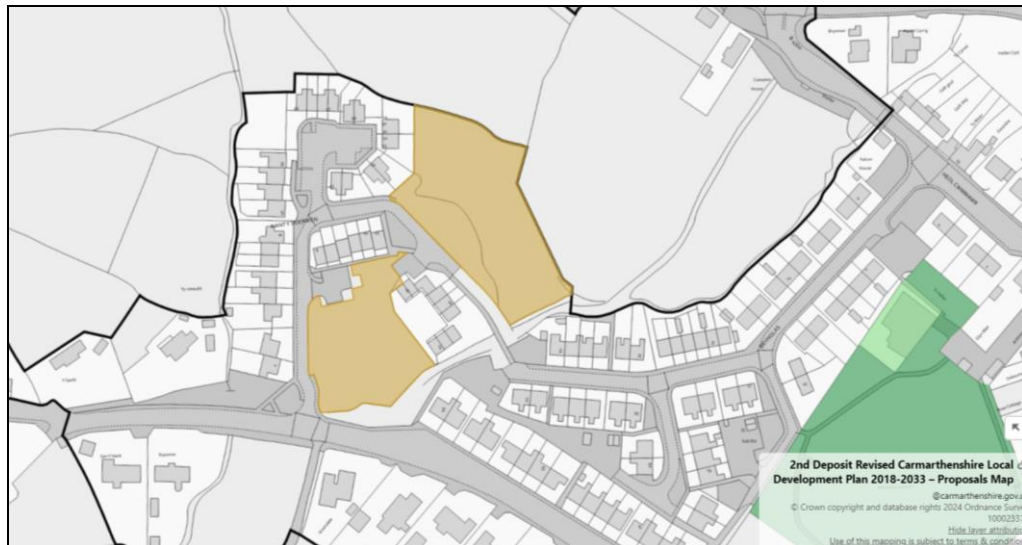
1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the Inspector:

- What is the current use of the allocated site?
- What is the proposed use of the allocated site?
- What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?
- In light of the constraints, and having regard to the need to provide affordable housing, is the allocation economically viable?
- Are the number of residential units proposed realistic and deliverable over the plan period?
- What are the mechanisms and timescales for delivering the site?
- Is the allocation of the site essential to ensure the soundness of the Plan?

2.0 THE PROPOSED ALLOCATION

2.1 THE SITE

2.1.1 Since the submission of our original objection to the allocation of the land for housing development purposes, the proposed allocation (Plan A) remains undeveloped, as illustrated by the aerial photograph below.



Plan A – Extract from Second Deposit Draft



Photograph 1 – Google Earth – September 2023

2.1.2 The site presently and for some time been used as open amenity land associated with the existing Nantydderwen housing estate, and is noted for expenses of mature scrub and mature trees, especially within the northern of the two undeveloped enclosures.

2.2 PLANNING HISTORY

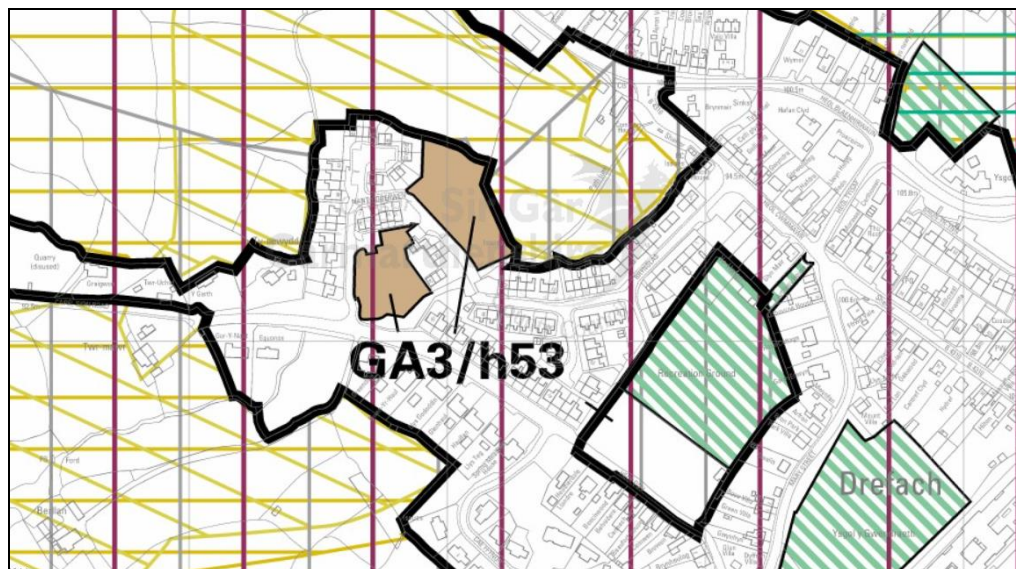
2.2.1 The proposed allocation has been the subject of one application for planning permission being Application W/20230 which sought approval for a total of 33 houses. The application was formally submitted in November 2008. However, the application lay undetermined for **almost 6 years until it was finally withdrawn in July 2014.**

2.2.2 Notwithstanding the above, the site is proposed in the 2nd Deposit Revised LDP for the purposes of developing 33 residential units, expected under Policy HOM1 to be delivered in two phases over Years 6-10 of the Plan Period, i.e. between 2023 and 2027, and the second phase in Years 11-15 (2028-33).

3.0 DEVELOPMENT DELIVERABILITY

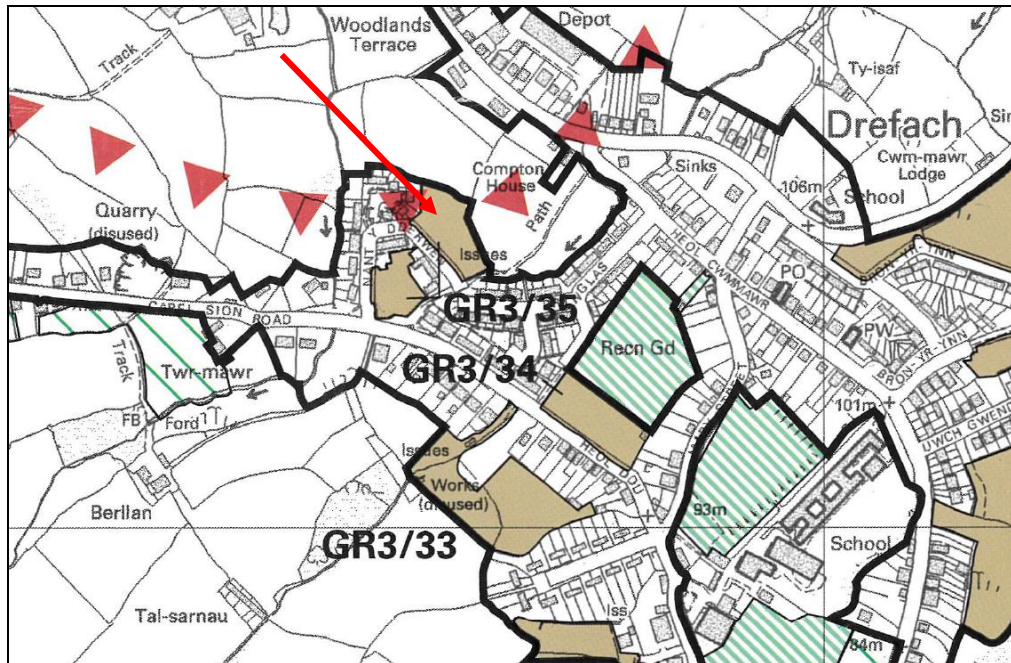
3.1 Welsh Government's Guidance in Development Plans Manual (Edition 3) (March 2020). Page 120 states: ***“Rolling forward allocations** - Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial 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. The sites should be subject to the same candidate site process requirements as new sites i.e., they must be demonstrated to be sustainable and deliverable. If an LPA wishes to retain such sites but cannot evidence, they will be delivered, i.e., for aspirational or regeneration purposes, they can still be allocated in the plan but not relied upon as contributing to the provision. It will not be appropriate to include such sites in the windfall allowance. They should be treated as ‘bonus sites.’”*

- 3.2 The site at Nantydderwen was allocated for residential development in the 2006-2021 Local Development Plan, as Site GA3/h53, as shown below at Plan B. That LDP was formally adopted in December 2014, and a period of almost 10 years has elapsed since the site was allocated for residential development in an adopted LDP. It is noted that **not one application for any planning permission** has been forthcoming since adoption, and over 10 years since Application W/20230 was withdrawn from consideration in July 2014.



Plan B – 2014 Adopted LDP

- 3.3 The site was also allocated in the **Carmarthenshire Unitary Development Plan, which was adopted in 2006**. Plan C below provides an extract from the Proposals Map from that Plan. The site was also allocated for residential development within the **Carmarthen District Local Plan which was adopted in 1997**. Yet, it remains undeveloped, with no recent applications for planning permission. A total of nearly 30 years has lapsed without any attempt to positively develop the land and being the above allocations to fruition.



Plan C – 2006 Adopted UDP Plan fro Drefach

3.4 The failure to submit detailed proposals to develop sites is quite striking, particularly as the site entry in Policy HOM1 indicates that the site is proposed for 100% affordable housing. The site is under the ownership of the County Council, and has been so for many years.

Given the lack of any notable activity, certainly over the last 10 years, it therefore must be questionable as to whether the landowner has genuine intentions to bring the allocated site to one which would provide social housing, which clearly the Plan indicates is needed.

4.0 DEVELOPMENT CONSTRAINTS

4.1 The Inspector will be fully aware of the recent changes to *Planning Policy Wales (Edition 12)* (PPW), particularly Chapter 6, there are a number of current and previous planning applications that have been determined within the County that are pertinent to the proposed allocation in question that should be given due consideration, which are as follows:

- Tirychen Farm, Ammanford (LPA Ref. No. PL/06556)
- Land off St Anne's Lane, Cwmffrwd, Carmarthen (LPA Ref. No. PL/04306)
- Gwelfor, Heol Llanelli, Trimsaran (LPA Ref. No. PL/06620)
- Land south of Cwmgarw Road, Upper Brynamman (LPA Ref. No. PL/04459)

4.2 Each case provides a 'real-time' indication of the interpretation of the new requirements of PPW by the LPA with respect to all aspects of ecology and biodiversity when a planning application is made, as illustrated by the accompanying decisions and related correspondence. In each of the above cases, Priority Habitat identified on the respective sites (such as marshy grassland and broadleaf woodland) has prevented their development being supported by the LPA, and in two cases PEDW.

4.3 The above is particularly important when considered proposed allocation PrC3/h14, when considering its current form and nature, particularly with respect to **the large number of mature trees present on the northern portion, and significant swathes of mature scrub within the southern portion of the allocated site**. The loss of such ecological assets and habitat would be inevitable were the site to be developed and for reasons set out in Section 3 of this Statement, it is clear that current national and emerging local planning policy does not support its development. As a result, the development of the site is contrary to the requirements and stepwise approach set out in Chapter 6 of *Planning Policy Wales (PPW)* (Edition 12).

5.0 TESTS OF SOUNDNESS

5.1 In summary, on the basis of the evidence submitted in and with this Statement, as well as that already submitted to the Authority, it is clear that the allocation of PrC3/h14 (Land at Nantydderwen, Drefach) fails to adhere to the following Tests of soundness, as required by the *Development Plan Manual*:

- Does the Plan fit?
- Is the Plan appropriate?
- Will the Plan deliver?

5.2 It is quite clear that the allocation of the land in question is not consistent with the guidance and requirements of national planning policy (particularly *Planning Policy Wales*), is not appropriate for allocation in light of the evidence, and will clearly, fail to deliver any residential units during the Plan period.

5.3 As a result, the inclusion of the allocation in question would result in the *Carmarthenshire Replacement Local Development Plan* being unsound and alternative sites such as those promoted on behalf of our Clients should in turn be allocated and included within the Plan, in order to rectify the situation.