



**CARMARTHENSHIRE REPLACEMENT LOCAL
DEVELOPMENT PLAN
EXAMINATION IN PUBLIC STAGE**

STATEMENT OF OBJECTION

**PROPOSED ALLOCATION PrC3/h4
TIRYCHEN FARM, AMMANFORD**

On behalf of
Evans Banks Planning Ltd

Our Ref: PrC3/h4/EBP
Representation No.: 5181
Representor ID: 4967
Date: September 2024
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1.0 INTRODUCTION

1.1 This Statement has been prepared by Evans Banks Planning Ltd on behalf of its Clients as a continued objection to the proposed allocation of land at Tirychen Farm, Ammanford (LDP Ref. No. PrC3/h4) 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 The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Revised Deposit stage, which still stand.

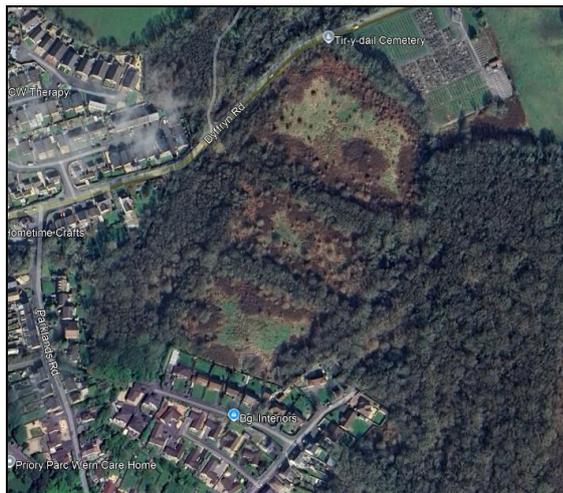
1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the Inspector:

- 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?

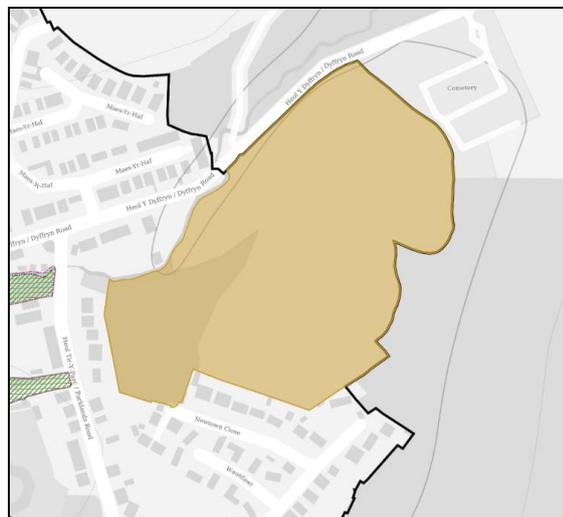
2.0 THE PROPOSED ALLOCATION

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.



Photograph 1



Plan A

2.1.2 There is clear evidence that the site is not in regular or active agricultural use, which has led to its reclamation by nature, as illustrated in the recently submitted Ecological Appraisal Report to the LPA as part of Planning Application PL/06556 (a copy accompanies this Statement), with the Habitat Plan reproduced below.



Plan B

2.1.3 As can be seen, the Priority Habitat of Broad-leaved Woodland (solid green shading above) now dominates the site, as well as restricting access to it. It is clear that less than 50% of the site is now occupied by semi-improved grassland, with hedgerows and woodland clearly well-established throughout it.

2.2 PLANNING HISTORY

2.2.1 As detailed above, the proposed allocation is subject to a current planning application, which was submitted to the Authority in September 2023. The application seeks to vary a condition on a previously granted outline consent, to in effect extend the period of time for the submission of reserved matters – and so in turn create a new outline planning permission.

2.2.2 As detailed above, the application continues to be under consideration by the Authority and has raised a number of objections from interested parties, including the Authority's Ecology Officer (copy of their responses accompany this submission). In summary, despite the site being allocated for residential development in the current LDP, the Officer has advised that they recommend refusal on the basis of the significant loss of a Priority Habitat (Semi-natural Broadleaved Woodland) and overall loss of biodiversity and ecosystem resilience. As a result, the development of the site is contrary to the requirements of Chapter 6 of *Planning Policy Wales* (PPW) (Edition 12).

2.2.3 The above advice and approach is consistent with other planning applications that have been determined by the Authority and also PEDW at appeal in recent months since the publication of the recent edition of PPW. Such examples of where the loss of priority habitat and a reduction of biodiversity include the following cases (despite being allocated for residential development in the current LDP), with the relevant decisions accompanying this submission.

- 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)

2.2.4 In view of the above and responses being received from the Authority's Ecology Officer to other planning applications, it is quite clear that the Authority will not be in a position to grant planning consent of Planning Application PL/06556.

3.0 DEVELOPMENT CONSTRAINTS

3.0.1 The original objection submitted at the Revised Deposit Stage of the LDP highlighted a number of constraints to the delivery of the proposed allocation during the Plan period, which remain. The proposed allocation has a long planning history for a significant number of residential units, but despite being allocated for such purposes for over 30 years, the site to date has failed to deliver a single home. The following therefore provides further doubt on the deliverability of the allocation during the Replacement Plan's lifetime.

3.1 PHYSICAL

3.1.1 As has been detailed in Section 2 of this Statement, the proposed allocation has an extremely high ecological and biodiversity value, which in itself represents a significant physical obstacle to its delivery for the purposes intended by the Council, if its development is to adhere to national planning policy requirements.

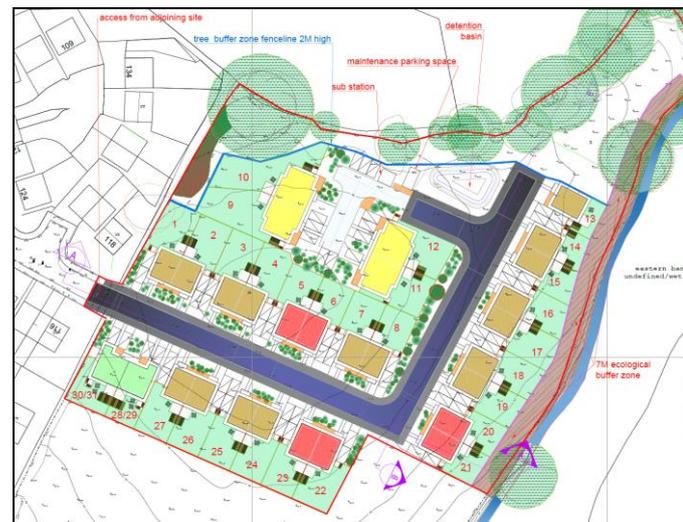
3.1.2 Notwithstanding the above it is recognised that certain elements of the site do have a lower ecological/biodiversity level (i.e. semi-improved grassland), but their location centrally within it would mean that access provision to them would still continue to result in an unacceptable loss of biodiversity and ecosystem resilience.

3.1.3 In addition to the above, it has recently been advised by the Authority's Ecology Officer on a planning application at Tirydail, Ammanford (LPA Ref. No. PL/06515) that where mature trees and hedgerows are present within and at the boundary of a site, such features and their root protection zones must be excluded from the development area and private garden space of a residential scheme. This is now to be a standard requirements by the Authority for residential developments throughout the County.

3.1.4 This has in turn then resulted in the net development area being reduced from the initial submission point (Plan C) to the site layout drawing now supported by the Ecology Officer (Plan D), as illustrated below.



Plan C



Plan D

3.1.5 When the above design requirements are then applied to the proposed allocation in question, it is clear that the actual net developable area for housing development is reduced further, leaving less than 25% available. However, as detailed above,

access to these areas is constrained resulting in the proposed allocation being physically incapable of being developed in line with national planning policy requirements.

3.2 DELIVERABILITY AND VIABILITY

- 3.2.1 In view of the limited and restricted net developable area of the proposed allocation, both its deliverability and viability on these grounds alone are put into serious question. The proposed allocation is clearly incapable of delivering any new residential units, let alone the 150 units proposed in the Replacement LDP.
- 3.2.2 As detailed in the original objection, there are also serious concerns with regards to the viability of developing the site, as advised independently by developers and a housing association we have spoken to. Having been allocated for over 30 years and still yet to be developed calls into question the land owners realistic aspirations to see the site developed.

4.0 TESTS OF SOUNDNESS

4.1.1 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/h4 (Tirychen Farm, Ammanford) 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?

4.1.2 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, yet again, fail to deliver any new residential units during the Plan period.

4.1.3 As a result, the continued 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.