



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

**STATEMENT OF OBJECTION**

**PROPOSED ALLOCATION SeC12/h3**  
**LAND AT DOL-Y-COED, NEWCASTLE EMLYN**

On behalf of  
Evans Banks Planning Ltd

**Our Ref:** SeC12/h3/EBP  
**EiP Rep. No.:** 4967  
**Date:** September 2024  
**Prepared by:** RAB

**Representation No.:** 5185

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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 Dol-y-Coed, Newcastle Emlyn (LDP Ref. No. SeC12/h3) 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 The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Revised Deposit stage, which still stand.

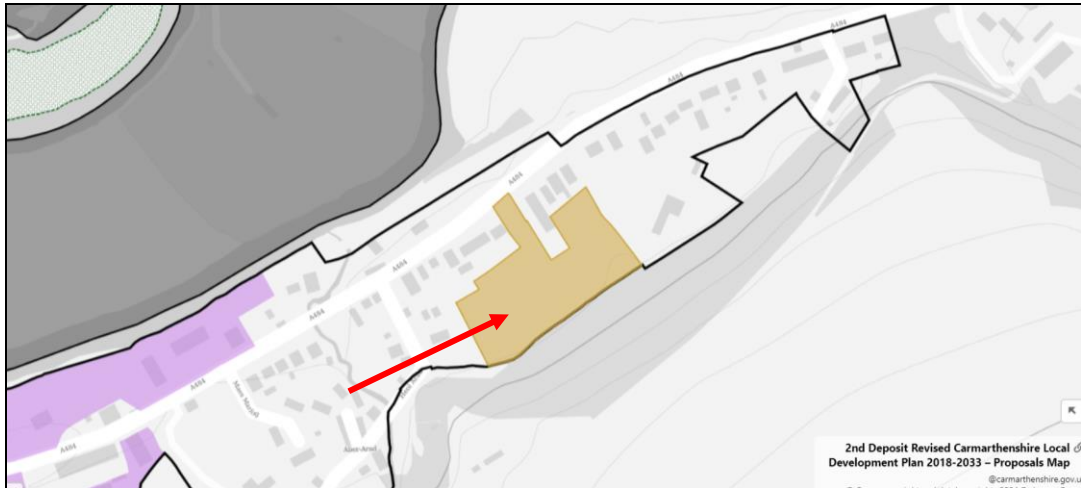
1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the Inspector:

- 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?

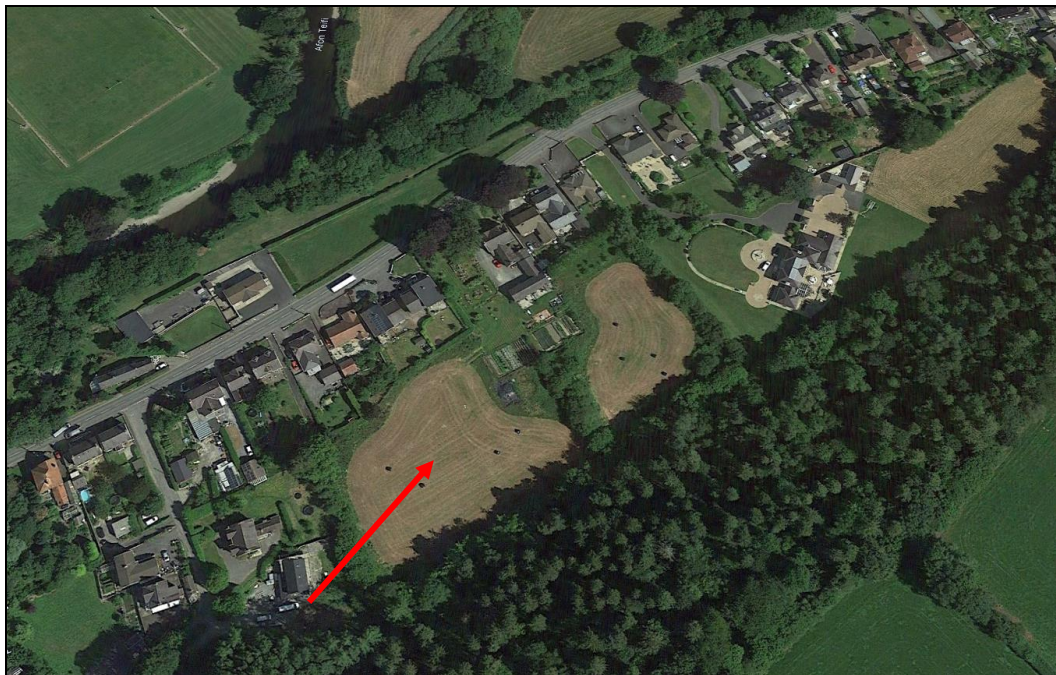
## 2.0 THE PROPOSED ALLOCATION

### 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 – Second Deposit Draft Map Extract



Photograph 1 – Google Earth – July 2021

2.1.2 The site presently and for some time been used for agricultural purposes only.

## 2.2 PLANNING HISTORY

2.2.1 The proposed allocation has NOT been the subject of ANY planning applications according to the Council's planning records.

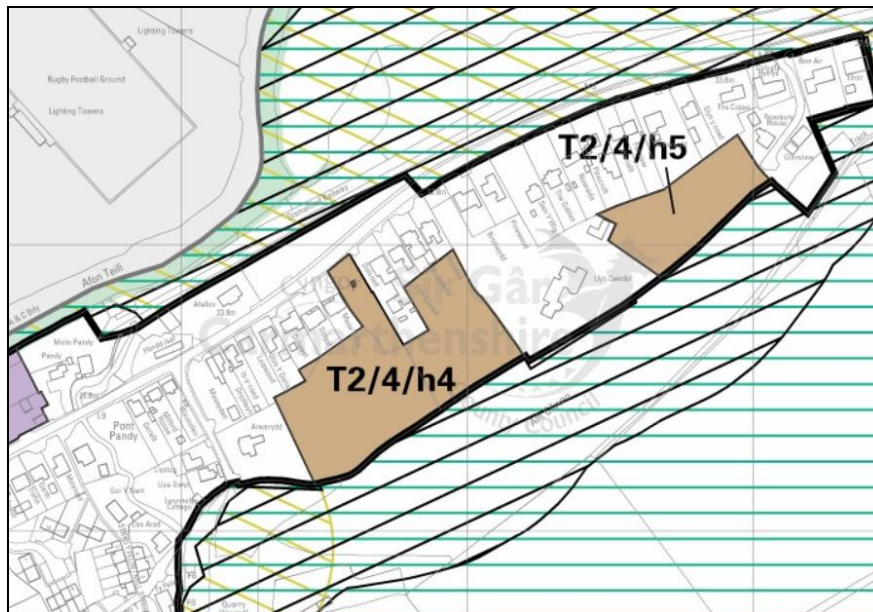
2.2.2 Notwithstanding the above, the site is proposed in the 2<sup>nd</sup> Deposit Revised LDP for the purposes of developing 20 residential units, expected under Policy HOM1 to be delivered in two phases over Years 6-10 of the Plan Period, i.e. between 2023 and 2037, and Years 11-15 (2028-33).

## 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 Dol-y-Coed was allocated for residential development in the 2006-2021 Local Development Plan, as part of Site T2/4/h4, 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. Furthermore, the site was also allocated for housing development in the Carmarthenshire Unitary Development Plan which was adopted in 2006.



**Plan B – 2014 Adopted LDP**

3.3 The failure to even seek planning permission to develop the site must therefore pose the question as to whether the landowner has genuine intentions to bring the allocated site to the market? Such failure cannot be attributed to the current inability to connect to the local sewerage system, due to phosphate issues in the River Teifi catchment. Those issues have only emerged in the last 3-4 years. For the period between 2006 (UDP adoption), and 2020-21, when phosphate issues were not prevalent, the Applicants could have sought and secured a permission, and subsequently implemented it on the site, when permitted connections to the sewerage system were feasible.

However, for the last 18 years, there is **no evidence of any attempt to seek a planning permission, let alone market the site with a national or regional estate agent.**

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## 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 SeC12/h3 (Land at Dol-y-Coed, Newcastle Emlyn) 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, fail to deliver any residential units during the Plan period.

4.1.3 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.