



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

STATEMENT OF OBJECTION

**PROPOSED ALLOCATION SeC13/h1
LAND AT CAE CANFAS, HEOL LLANELLI, PONTYATES**

On behalf of
Evans Banks Planning Ltd

Our Ref: SeC1/h4/EBP
Representation No.: 5076
Representor ID: 4967
Date: September 2024
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1.0	INTRODUCTION	3
2.0	THE PROPOSED ALLOCATION.....	4
2.1	THE SITE.....	4
2.2	PLANNING HISTORY.....	5
3.0	DEVELOPMENT CONSTRAINTS	6
3.1	PHYSICAL	6
3.2	DELIVERABILITY AND VIABILITY.....	6
4.0	TESTS OF SOUNDNESS	8

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 Cae Canfas, Heol Llanelli (LDP Ref. No. SeC1/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 The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Revised Deposit stage, which still stand.

1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the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



Plan A



Photograph 1

2.1.2 The site is generally level with access, in development terms, available directly off Heol Llanelli to the north via a private access drive. All of the proposed allocation's boundaries are defined by existing residential properties and their associated means of enclosure. The remainder of the built form of Poyates can then be found to the site's east and north west.

2.1.3 The site is currently undeveloped and is being actively used for general grazing purposes.

2.2 PLANNING HISTORY

2.2.1 The proposed allocation has no planning history nor we understand has been the subject of a pre-application enquiry to the LPA, despite being allocated in the *Carmarthenshire Local Development Plan* (adopted in 2014). Despite therefore being allocated for almost 10 years, no new housing has been constructed on the land in question.

2.2.2 Despite the above, the site is proposed in the 2nd Deposit Revised LDP for the purposes of developing 8 residential units, with none expected to be affordable in nature.

3.0 DEVELOPMENT CONSTRAINTS

3.0.1 The original objection submitted at the Revised Deposit Stage of the LDP questioned the delivery of the proposed allocation during the Plan period. 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, we are not aware of any physical constraints to the development of the site. The site is covered in semi-improved grassland, with no mature trees or hedgerows within it or on its boundaries. The access serving the land off Heol Llanelli also appears to be of sufficient width to accommodate an adoptable highway, which would in turn be served by sufficient visibility in both directions. We also understand that the local public sewer network has sufficient capacity to accommodate a development of the anticipated scale.

3.1.2 As a result of the above, historically or currently, there are no physical constraints to the development of the site.

3.2 DELIVERABILITY AND VIABILITY

3.2.1 Despite the above absence of any physical constraints to the development and the allocation of the land for almost 10 years for residential purposes, the site remains undelivered. These facts are somewhat surprising and on their own seriously question the delivery of the allocation in question.

3.2.2 Upon examining the Council's Candidate Site Register, it is noted that no party put the site forward for consideration for allocation within the emerging LDP. In addition, it is evident from an online search that no agent has been instructed to actively market the land for sale as a potential development site.

3.2.3 We appreciate that the land is not physically constrained from being developed, but there are serious questions on its historical and current availability for development. This level of uncertainty therefore places a significant question with regards to its ability to be delivered within the Replacement Plan’s lifetime, when it has failed to be delivered within the lifetime of the previous Plan.

3.2.4 *Planning Policy Wales* (Edition 12) is quite clear on the matter of what is considered to be a deliverable site, providing the following definition at Paragraph 4.2.11:

“To be ‘deliverable’, sites must be free, or readily freed, from planning, physical and ownership constraints and be economically viable at the point in the trajectory when they are due to come forward for development, in order to support the creation of sustainable communities.”

3.2.5 No evidence has been presented by the LPA or other parties that the historic ‘ownership constraints’ that have prevented the site from being developed for the last 10 years, will not continue to prevent it being developed within the next Plan period.

3.2.6 The significant questions over the deliverability of the site therefore questions its ability of delivering any new residential units within the Plan period and in turn, is proposed inclusion for such purposes as part of the Replacement LDP.

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 SeC1/h4 (Land at Cae Canfas, Heol Llanelli, Pentyates) 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 again, 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.