



CARMARTHENSHIRE REPLACEMENT LOCAL
DEVELOPMENT PLAN
EXAMINATION IN PUBLIC STAGE

STATEMENT OF OBJECTION

PROPOSED ALLOCATION PrC2/h23
LAND AT DAFEN EAST GATEWAY, LLANELLI

On behalf of
Evans Banks Planning Ltd

Our Ref: PrC2/h23/EBP
EiP Rep. No.: 4967
Date: September 2024
Prepared by: RAB

Representation No.: 5239

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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 Dafen East Gateway, Llanelli (LDP Ref. No. PrC2/h23) 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 The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Revised Deposit stage, which still stand.

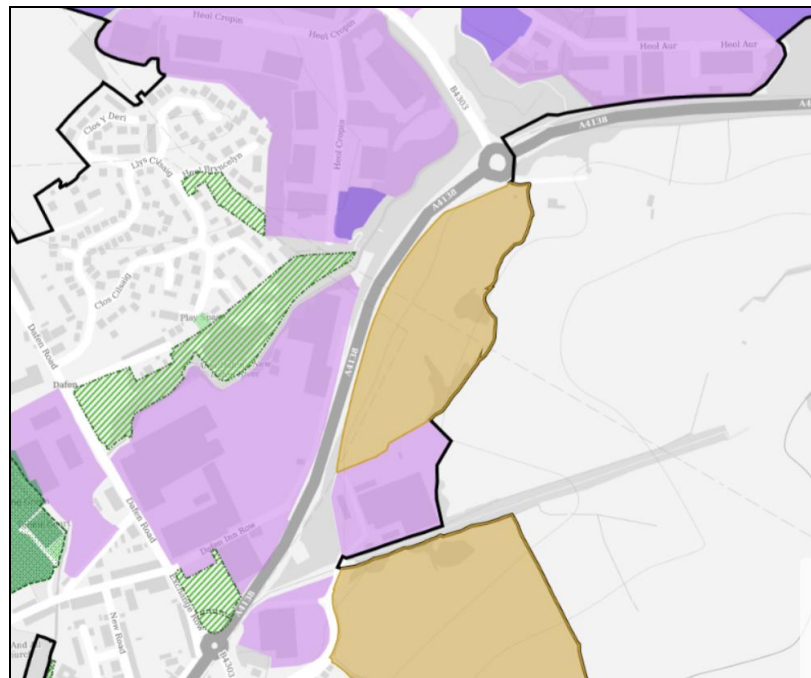
1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the Inspector:

- 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, being agricultural land under rough grazing.



Plan A – Extract from Second Deposit Draft



Photograph 1 – Google Earth – September 2023

2.2 PLANNING HISTORY

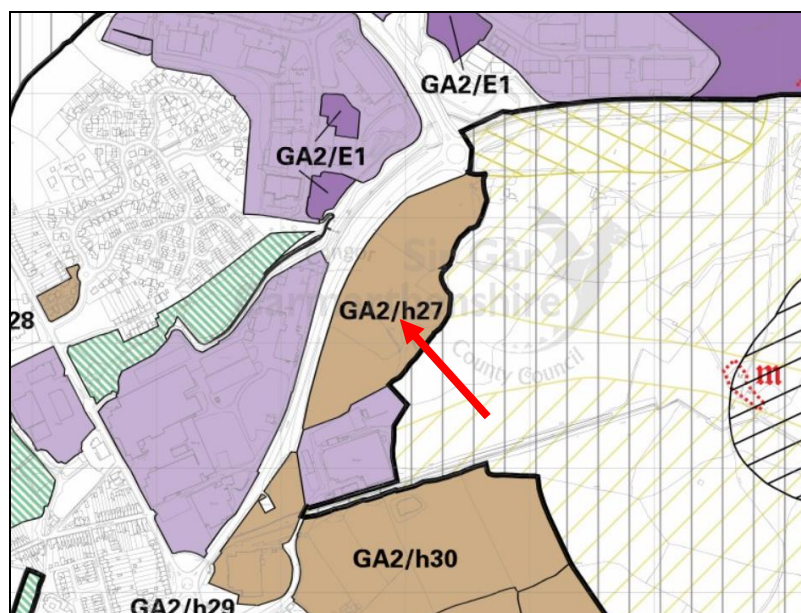
2.2.1 The proposed allocation has been the subject of one application for full planning permission. A total of 145 dwellinghouses were proposed across the site under Application PL/04082, but which was **refused permission on 13th February 2024**.

The primary reason for refusal is that under that application, a total of 62 of the 145 proposed houses fell into an area susceptible to high levels of background noise associated with the adjacent A4138 distributor road and also Dyfed Steel Limited, located on the opposite, western side of that road. Both existing noise emitting uses would have adversely affected new occupiers of those proposed dwellinghouse at levels in excess of that permitted under guidance in TAN11.

2.2.2 Notwithstanding the above, the site is proposed in the 2nd Deposit Revised LDP for the purposes of developing **150 residential units**, expected under Policy HOM1 to be delivered over Years 6-10 of the Plan Period, i.e. between 2023 and 2027.

3.0 DEVELOPMENT DELIVERABILITY

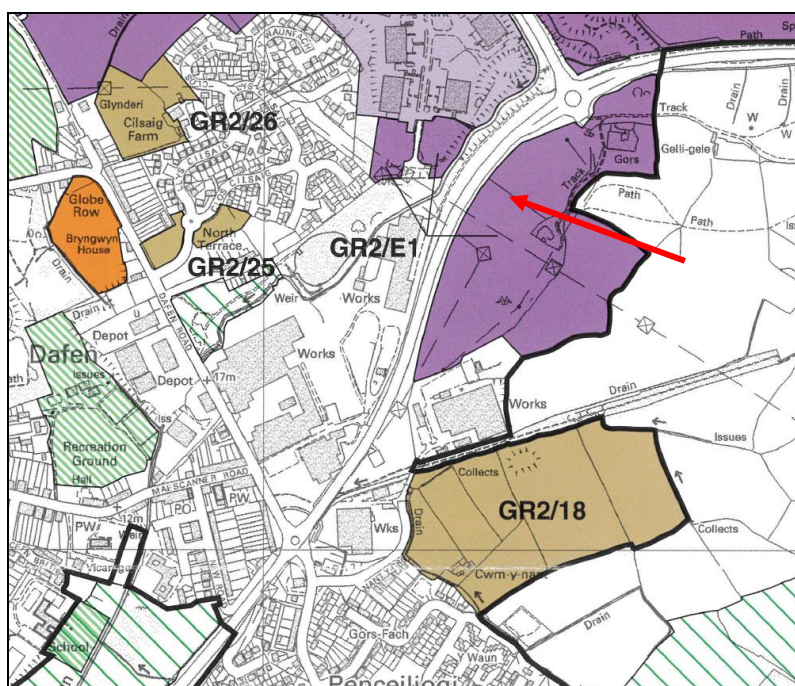
- 3.1 Welsh Government’s Guidance in Development Plans Manual (Edition 3) (March 2020). Page 120 states: **“Rolling forward allocations** - Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial 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 Dafen East Gateway is allocated for residential development in the Deposit Draft 2006-2021 Local Development Plan. The LDP was formally adopted in December 2014. Plan B below illustrates its allocated status as Site GA2/h27.



Plan B – 2014 Adopted LDP

3.3 The site was 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. Site GR2/E1 proposed an Employment Site off the eastern flank of the A4138 road, which also extended north off the opposite side of the Dafen Gateway roundabout.

Yet, the allocated site remains undeveloped, especially after the recent refusal of planning permission for 145 houses thereon. It appears that the **original UDP allocation as employment was the correct allocation** given the close proximity of heavy industrial uses off the opposite, western flank of the A road, and heavy traffic using the main link road between Llanelli and Junction 48 of the M4 Motorway. These high-level noise nodes are such to create noise levels well in excess of TAN11 guidelines.



Plan C – 2006 Adopted UDP Plan for Dafen East Gateway

3.4 The refusal of permission for the detailed proposals due to fundamental noise issues must now call into question the retention of the site for residential purposes under Policy The site is **under the ownership of the County Council, and has been so**

for many years. The proposals for residential development should be omitted and the land returned to an employment allocation, akin to the 2006 UDP allocation.

4.0 TESTS OF SOUNDNESS

4.1 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 PrC2/h23 (Land at Dafen East Gateway) 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?

4.2 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.

4.3 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.