



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

STATEMENT OF OBJECTION

**PROPOSED ALLOCATION PrC1/h4
PARC Y DELYN, CARMARTHEN**

On behalf of
Evans Banks Planning Ltd

Our Ref: PrC1/h4/EBP
Representation No.: 5173
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 off Parc y Delyn, Carmarthen (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 The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Revised Deposit stage, which still stand.

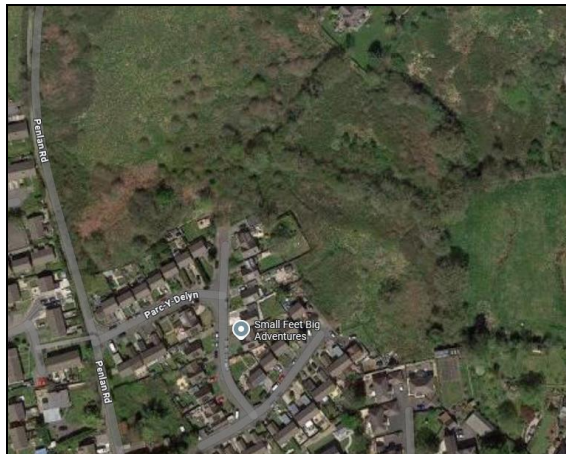
1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the Inspector:

- 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?

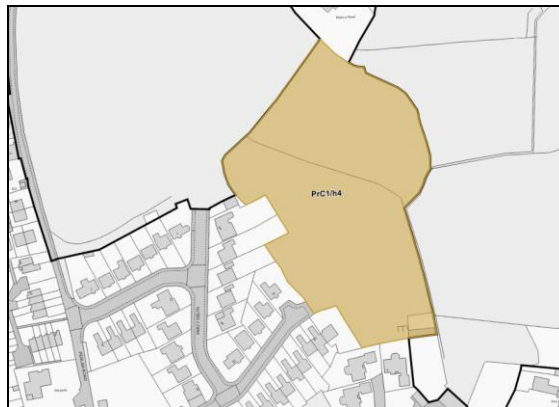
2.0 THE PROPOSED ALLOCATION

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, leading to much of it now being covered in scrub, natural grassland and mature trees. In

addition, as can be seen from Photograph 1, the site contains a significant number of large mature trees and hedgerows, some of which can be seen in the background of the photograph below.



Photograph 2

2.1.3 As detailed previously, two of the trees at the current access point into the proposed allocation are the subject of a Tree Preservation Order (LPA Ref. No. W13),

2.2 PLANNING HISTORY

2.2.1 The proposed allocation has no relevant planning history, but is proposed in the 2nd Deposit Revised LDP for the purposes of developing 17 residential units, with 1.7 expected to be affordable in nature.

2.2.2 Notwithstanding the above, in view of 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:

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- 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)

2.2.3 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 woodland) has prevented their development being supported by the LPA, and in two cases PEDW.

2.2.4 The above is particularly important when considered proposed allocation PrC3/h4, when considering its current form and nature, particularly with respect to mature trees and hedgerows. 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).

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 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 a 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 The above is particularly the case when the existing mature hedgerows and trees are taken into account, due to their recognised high ecological value.

3.1.3 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 we understand from speaking with the Council's Officers is now to be a standard requirement by the Authority for residential developments throughout the County.

3.1.4 In terms of the example referred to above, this has in turn then resulted in the net development area being reduced from the initial submission point (Plan C) to current 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 less than when the LPA determined to include it as a proposed allocation in the 2nd Deposit Revised LDP. The diagram below provides an illustration of the areas to be excluded from any form of residential development (including gardens), leaving only that within the area edged yellow available for residential development.



Plan E

3.1.6 Notwithstanding the above, in order to access the northern area (which also contains a significant area of scrub habitat), a significant amount of mature hedgerow and trees would need to be removed to provide access to it. As a result, physically, this element of the application is therefore not accessible in line with current national planning policy. As a result, the net developable area is significantly less than that covered by the allocation and at best would relate to an area less than 0.3ha in area.

3.1.7 As a result of the above, in physical terms, the proposed allocation is not capable of being delivered, and at the very least for any where near the numbers expected by the LPA.

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 significant number residential units, let alone the 17 units proposed in 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 PrC1/h4 (Land off Parc y Delyn, Carmarthen) 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 new 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.