



CARMARTHENSHIRE REPLACEMENT LOCAL
DEVELOPMENT PLAN
EXAMINATION IN PUBLIC STAGE

STATEMENT OF OBJECTION

PROPOSED ALLOCATION SeC6/h2
LAND OFF CLAYTON ROAD, HENDY

On behalf of
Evans Banks Planning Ltd

Our Ref: SeC6/h2/EBP
EiP Rep. No.: 4967
Date: September 2024
Prepared by: RAB

Representation No. 5221

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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 Clayton Road, Hendy (LDP Ref. No. SeC6/h2) 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 The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Revised Deposit stage, which still stand.

1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the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 – May 2023

2.1.2 The western portion of the site has seen the construction of six detached houses off a cul-de-sac estate road layout. The eastern portion of the site remains undeveloped.

2.2 PLANNING HISTORY

2.2.1 The proposed allocation has been subject to one full planning application granted in April 2017 under Application S/34537. It proposed a total of 8 houses over the **western portion of the site only**, as shown below at Plan B.

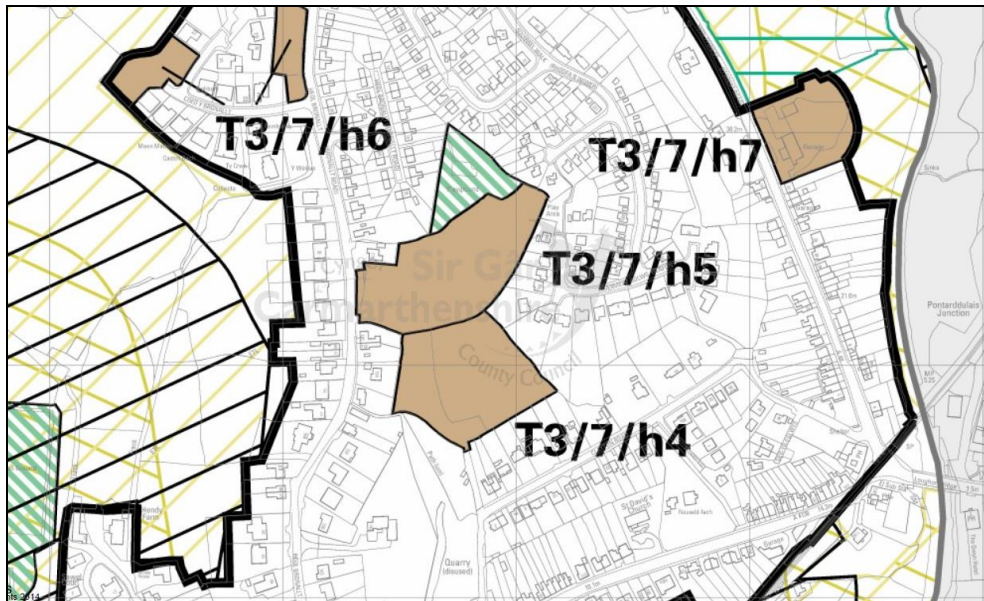


Plan B – 2018 approved site layout to western portion of Allocation

2.2.2 Notwithstanding the above, the site is proposed in the 2nd Deposit Revised LDP for the purposes of developing 20 residential units.

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 off Clayton Road was allocated for residential development in the 2006-2021 Local Development Plan, as Site T3/7/h5, 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 of **28 units** in that adopted LDP. It was noted until the latter stage of the 2006-21 Plan Period that an application for planning permission was forthcoming, that being in 2017 – and only for 8 units on the western portion of the site only.



Plan B – 2014 Adopted LDP Proposals Map for central Hendy

3.3 The failure to submit detailed proposals to develop sites is quite striking in a settlement such as Hendy. The settlement lies immediately off Junction 48 of the M4 Motorway and benefits from excellent road and rail connections, particularly the A42138 distributor road to Llanelli. It benefits from a local primary school, range of convenience shops and supermarket at Pontardulais, community centre, rail station at Pontardulais and numerous public houses.

It highly popular with new homeowners, in search of new, modern properties given its location off the M4 and opportunities for convenient commuting to Swansea and work destinations both further east, and west to Carmarthen along the M4 / A48 road network

3.4 That popularity is graphically witnessed at Fforest Road in Hendy where a development of 35 dwellinghouses has been completed in recent years. Llwyngwern has been completed off the easter flank of the M4 corridor lying off Heol-y-Parc. In fact, many of the allocated sites from the 2014 LDP have subsequently been built out and completed.

It therefore must be questionable as to whether the landowner has genuine intentions to bring the central and eastern part of the allocated site to the market? For the last

10 years, and certainly in the last 7 years since planning permission, there is **no evidence of any attempt to market the eastern site with a national or regional estate agent, especially after the completion of the majority of the western portion.**

- 3.5 It is noted that the Council have taken the step to remove Allocated site T3/7/h4 from the Replacement LDP currently under examination. That site lay immediately to the south of the current draft allocation at Clayton Road. They have nevertheless retained the land “east of Bronallt Road” within the defined settlement limits, as “white land” within the Proposals Map.
- 3.6 We would submit that given the site off Clayton Road also retains a location set amongst the physical form of Hendy, that it is also afforded the same status but not specifically allocated for housing, and that genuine housing allocations should be sought elsewhere from our clients’ Candidate Site submissions.

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 SeC6/h2 (Land off Clayton Road, Hendy) 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.