



CARMARTHENSHIRE REPLACEMENT LOCAL
DEVELOPMENT PLAN
EXAMINATION IN PUBLIC STAGE

STATEMENT OF OBJECTION

PROPOSED ALLOCATION PrC2/h22
LAND AT CWM-Y-NANT, DAFEN, LLANELLI

On behalf of
Evans Banks Planning Ltd

Our Ref: PrC2/h22/EBP
EiP Rep. No.: 4967
Date: September 2024
Prepared by: RAB

Representation No.: 5238

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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 Cwm-y-Nant, Dafen, Llanelli (LDP Ref. No. PrC2/h22) 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 The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Revised Deposit stage, which still stand.

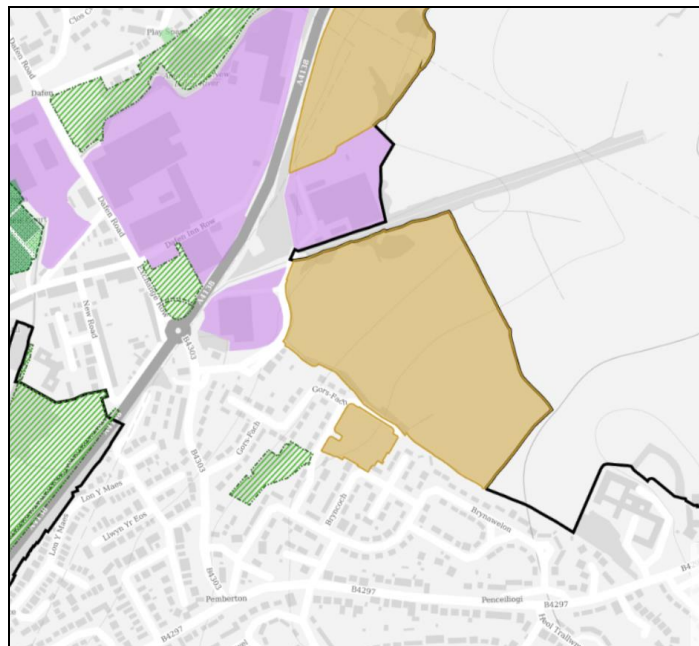
1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the Inspector:

- 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

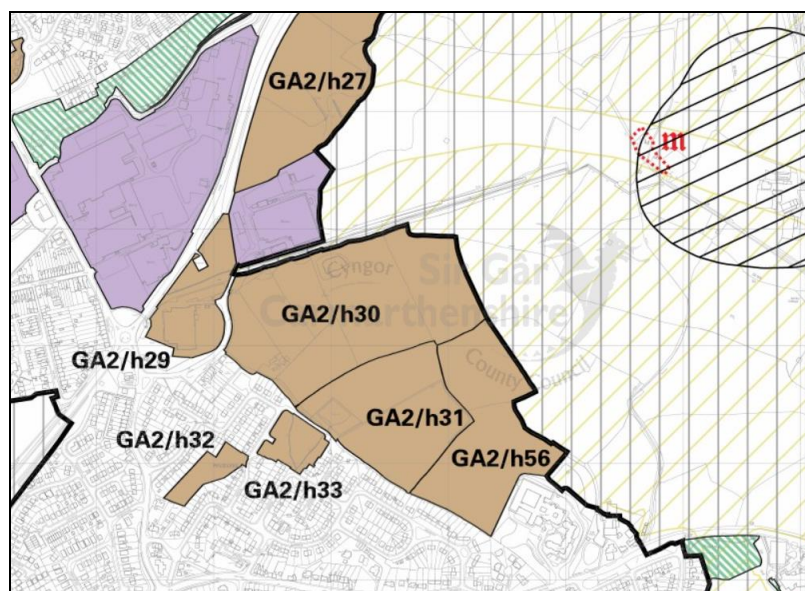
2.2 PLANNING HISTORY

2.2.1 The proposed allocation has been the subject of one application for **outline** planning permission. A total of 202 dwellinghouses were granted permission in July 2021 under Application S/40692. That permission has recently lapsed, however an application under Section 73 of the Act has recently been lodged in August 2024 and registered as PL/08091, seeking to vary the time period for validity of the 2021 permission for a further five years.

2.2.2 Notwithstanding the above, the site is proposed in the 2nd Deposit Revised LDP for the purposes of developing **202 residential units**, expected under Policy HOM1 to be delivered over two phases on Years 6-10 of the Plan Period, i.e. between 2023 and 2027, and Years 11-15 (2028-2033).

3.0 DEVELOPMENT DELIVERABILITY

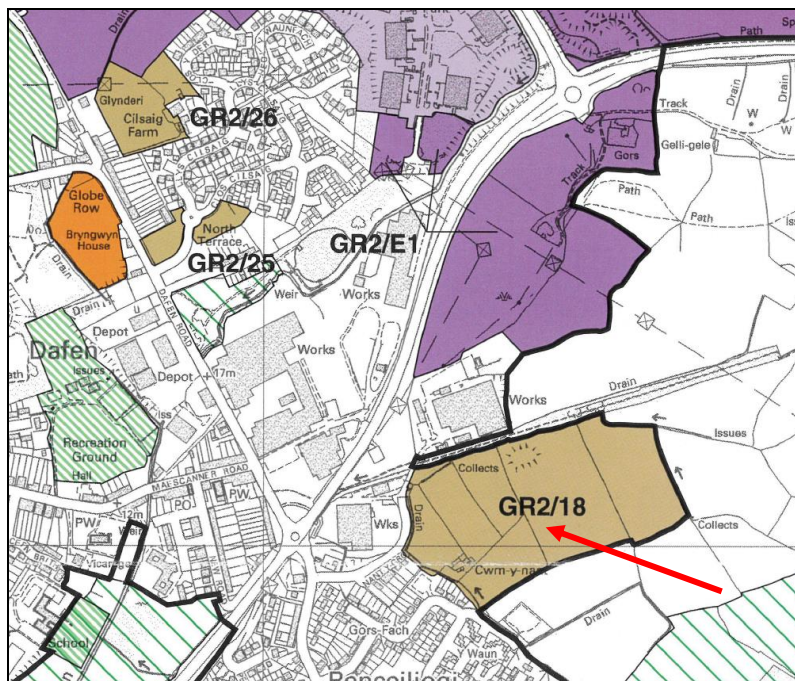
- 3.1 Welsh Government’s Guidance in Development Plans Manual (Edition 3) (March 2020). Page 120 states: **“Rolling forward allocations - Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial 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 Cwm-y-Nant 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 Sites GA2/h30 and h31.



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 GR2/18 proposed a Residential Site which also included fields to the east of the current allocation.

Yet, the allocated site remains undeveloped since 2006, being a period of 18 years, with the site not presenting any firm development proposals in the form of detailed designs.



Plan C – 2006 Adopted UDP Plan for Cwm-y-Nant, Dafen

3.4 The site is **under the ownership of the County Council, and has been so for many years**. The proposals for residential development show no signs of being marketed, nor being brought forward for affordable housing by a Housing Association. As such despite being allocated for 18 years in successive Development Plans there appears no prospect of a continued and deliverable housing site at Cwm-y-Nant.

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/h22 (Land at Cwm-y-Nant, Dafen) 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.