



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

**STATEMENT OF OBJECTION**

**PROPOSED ALLOCATION SeC7/h3  
LAND AT HEOL GELYNEN, BRYNAMMAN**

On behalf of  
Evans Banks Planning Ltd

**Our Ref:** SeC9/h2/EBP  
**Representation No.:** 5183  
**Representor ID:** 4967  
**Date:** September 2024  
**Prepared by:** JDE

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<b>1.0</b>	<b>INTRODUCTION .....</b>	<b>3</b>
<b>2.0</b>	<b>THE PROPOSED ALLOCATION.....</b>	<b>4</b>
<b>2.1</b>	<b>THE SITE.....</b>	<b>4</b>
<b>2.2</b>	<b>PLANNING HISTORY.....</b>	<b>5</b>
<b>3.0</b>	<b>DEVELOPMENT CONSTRAINTS .....</b>	<b>7</b>
<b>3.1</b>	<b>PHYSICAL .....</b>	<b>7</b>
<b>3.2</b>	<b>DELIVERABILITY AND VIABILITY.....</b>	<b>9</b>
<b>4.0</b>	<b>TESTS OF SOUNDNESS .....</b>	<b>11</b>

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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 at Gelynen, Brynamman (LDP Ref. No. SeC9/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 The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Revised Deposit stage, which still stand.

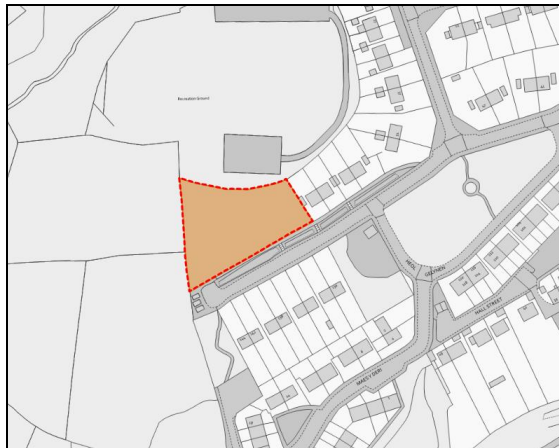
1.2 In addition to providing, where relevant, updated information since the originally made objection (particularly in view of recent changes to national planning policy), this Statement also seeks to address the following questions raised by the Inspector:

- 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



Photograph 1

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2.1.2 As detailed in previous submissions, the site once accommodated 6 residential dwellings, but these were demolished by the land owner (Carmarthenshire County Council) in 2007. Since that date, the site has remained vacant resulting in it now having been reclaimed by nature, with its current appearance being dominated by scrub and a large number of mature trees along its boundaries and within it.

## 2.2 PLANNING HISTORY

2.2.1 As detailed above, 6 residential dwellings were demolished on the site as part of Prior Notification application number E/17791. Since this decision, no further planning application for residential development or any other form of development has been made by the land owner or any other party.

2.2.2 Notwithstanding the above, the site is proposed in the 2<sup>nd</sup> Deposit Revised LDP for the purposes of developing 8 residential units, with all 8 expected to be affordable in nature.

2.2.3 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:

- 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)

2.2.4 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

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identified on the respective sites (such as marshy grassland and broadleaf woodland) has prevented their development being supported by the LPA, and in two cases PEDW.

- 2.2.5 The above is particularly important when considered proposed allocation SeC9/h2, when considering its current form and nature, particularly with respect to the large number of mature trees present on it. 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).

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## 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 extent of existing mature trees present on the site 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 2<sup>nd</sup> 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.





**Photograph 2**

3.1.6 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 0.1ha in area. In addition, due to its shape, the practical area available for any form of development is significantly smaller.

3.1.7 As a result of the above, in physical terms, the proposed allocation is not capable of being delivered and will not deliver 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.

3.2.2 In addition to the above, we have seen no evidence that the site has been actively marketed for development purposes since its previous inclusion within the development limits in the current adopted LDP. Its availability for any form of development is also then called into question.

3.2.3 The proposed allocation is therefore clearly incapable of delivering any number residential units, especially the 8 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 SeC9/h2 (Land at Heol Gelynon, Brynamman) 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.