

CCC Deposit LDP – Housing Land Allocation and Planning Application E/26681

The housing land allocation procedure:

In the published Deposit LDP it is stated that the calculated target for new homes in the county is 13,340 over the Plan period These are to be distributed across the county in accordance with the settlement hierarchy.

The hierarchy is as follows:

Tier 1 Growth Centres [3] eg Carmarthen

Tier 2 Service Centres [6] eg Llandovery

Tier 3 Local Service Centres [11] eg Llangadog

Tier 4 “Sustainable” Communities [32] eg Cynghordy

Of the total county-wide target of 13,340 units, 1644 are to be built within the 6 Service Centres. They are distributed between these 6 settlements taking local circumstances into account.

For Llandovery [settlement no. T2/3] land must be allocated to accommodate **148** new homes.

Appendix 3 of the LDP written statement. shows the allocated land for housing in each settlement . In the case of Llandovery two sites have been allocated :

- Site T2/3/h1 Land to the north of Dan y Crug.
- Site T2/3/h2 Land opposite Dan y Crug

The Llandovery allocations:

The capacities for these sites deemed appropriate in the Deposit LDP are **120** and **28** units respectively, a total of 148 units.

A planning application has been submitted for the development of **76** houses on site T2/3/h1 61 of which would be for the open market and the remaining 15 would be Section 106 affordable homes.

However the CCC planning officer dealing with the application, Mr. Kevin Phillips, has stated [11 March 2013] that it has been amended to show a total number of **61** units. He also professes to know nothing of the LDP allocation of 148 units to the Brecon Road sites but this is difficult to believe.

All the indications are that the planning officer is recommending approval of the application, ahead of the adoption of the LDP. Cllr Jackson has also stated publicly that he is determined to see the application approved.

However this is a significant change to the application which requires the LPA to advise the public and to go through the correct consultation procedures.

If this development of 61 homes is approved and the allocated 28 homes on site T2/3/h2 are eventually developed, 89 new homes will have been developed on the allocated land. But the Deposit LDP is calling for 148. Where would the remaining 59 units be built? The answer must be that a subsequent planning application would be made to increase the density of development on site T2/3/h1 to achieve a total figure of 120 units.

This appears to be the developer's strategy:

- **Making a planning application for the full 120 unit allocation would be almost certain to cause outrage. So design a layout for 76 units with built-in flexibility that would enable a future increase in density.**
- **Make an initial application for 76 units using some land directly behind Dan y Crug which is also affected by the C2 flood zone. The 15 units on this land would be seen as expendable if necessary.**
- **In the face of opposition, retreat from 76 to 61 units by sacrificing the 15 most contentious plots. This would be seen as a "concession" and defuse at least some of the opposition to the application, making it easier to get planning consent.**
- **Once planning consent has been received, re-plan the site layout to absorb a further 59 units and submit another planning application for the full 120. Consent would be virtually guaranteed as CCC will be seeking to use the entire allocation. There would be outrage but to no avail.**
- **The conclusion must be that the developer of site T2/3/h1 wants planning consent for 120 units before selling it on, and that he intends to achieve it *by stealth* in order to minimise opposition to the initial application.**

It is also clear that the LPA intends to keep the entire allocation of housing land on the two Brecon Road sites. It is inconceivable that the Forward Planning and Development Management teams within CCC do not speak to each other.

None of this changes the fact that the currently proposed allocation in the Deposit LDP would have serious adverse consequences for the town and should be amended along the lines suggested in the LATRA /Calon Cymru Network proposal.

Furthermore the correct procedures for public consultation set out by the Planning Inspectorate have not been followed, and this invalidates the Deposit LDP.

Therefore the pending planning application, E/26681, should go through the mandatory public consultation process and assessed against the current UDP policies and allocations, with which it clearly does not comply.