

Statement of Common Ground

Between

Carmarthenshire County Council and the Study Group:

The Home Builders Federation; Dŵr Cymru Welsh Water;

Persimmon Homes; Barratt Homes;

Mid Wales Housing Association; Pobl Group;

Bro Myrddin Housing Association; Asbri Planning; JCR Planning.

July 2019

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1. Introduction

1.1 This Statement of Common Ground (SoCG) has been prepared by Carmarthenshire County Council for the 2019 Joint Housing Land Availability Study for the Carmarthenshire area (excluding the area that falls within the Brecon Beacons National Park). The 2019 Study covers the period 1st April 2018 – 31st March 2019.

1.2 This SoCG follows the process set out in the agreed delivery timetable for the preparation of the JHLAS for 2019 and has been prepared in accordance with the requirements of Planning Policy Wales and Technical Advice Note 1, Joint Housing Land Availability Studies (TAN 1).

1.3 The Carmarthenshire JHLAS Study Group comprises:

- Carmarthenshire County Council (CCC)
- Home Builders Federation (HBF)
- Dŵr Cymru Welsh Water (DCWW)
- Persimmon Homes
- Barratt Homes
- Mid Wales Housing Association
- Pobl Group
- Bro Myrddin Housing Association
- Asbri Planning
- JCR Planning

1.4 This SoCG has been prepared for the Welsh Government.

2. Agreed Matters

5 Year Land Supply Sites

2.1 Consultation on the site schedule and site proformas took place with the Study Group between 22 May and the 12 June 2019. Responses were received from HBF and DCWW and subsequent negotiations were held on a number of site forecasts with the HBF. The draft Statement of Common Ground was sent to members of the Study Group on the 9 July 2019 requesting comments be submitted by the 23 July 2019. No further comments were received.

Agreed Sites

2.2 The proposed site schedule is provided at Appendix 1. The individual site proformas are provided at Appendix 3.

2.3 All the details within the site schedules are agreed by the HBF which reflect the minor modifications / factual corrections agreed during the consultation, which are set out in Appendix 2.

Large and Small Site Completions

Completions 1 st April 2018 – 31 st March 2019	Large Site Completions	Small Site Completions
394	277	117

3. Five Year Land Supply Calculations

Agreed Position

3.1 All site specific details have been agreed, subject to minor modifications and factual corrections as set out in Appendix 2.

A	Total Housing Requirement (as set out in the adopted Development Plan)	13,352
B	Completions from start of plan period to JHLAS base date (large and small sites)	7,046 ¹
C	Residual Requirement (A-B)	6,306
D	5 Year Requirement (see 3.2 below)	8,976
E	Annual Need (D/5)	1,795
F	Total 5 Year Land Supply	6,254
G	Land Supply in Years (F/E)	3.5

3.2 The Carmarthenshire LDP has three years left to run, as a result, the average annual requirement (column E) should be calculated using the formula contained in Table 4 of TAN 1 which is set out below.

$$\frac{(H \times N / P) + (H - C)}{5} = \frac{(13,352 \times 3 / 15) + (13,352 - 7,046)}{5} = 1,795$$

Where:

H = Total Housing Requirement (as set out in the adopted Development Plan) - **13,352**

N = Number of years left in JHLAS period after the plan period expires – **3**

P = Total number of years in plan period – **15**

C = Completions from start of plan period to JHLAS base date - **7,046**

¹ Completions on large sites since 2006 = 5974, completions on small sites since 2006 = 1072 (based on an estimated 9 years @74 =666 [LDP average provision of 1,111 over the plan period: 1,111/15x9], actual completions: 2016=92; 2017=92; 2018=105; 2019=117).

Appendix 2

Agreed Minor Changes / Amendments

Consultation with the Home Builders Federation

LPA Ref / Address	HBF Comments	CCC Response	HBF Further comments	CCC Response
C/041/05 Rear of Post Office	How long has the S106 been waiting to be signed if over 1 year move to Cat3.	Resolution to approve subject to S106 was given in October 2018, therefore, maintain within Cat3.	I presume you mean Cat 2. Agreed	Yes, sorry, Cat 2.
C/055/02 Land adjacent Lleine	Any progress from last year when conditions were being discharged.	The land is currently for sale, access has been created.	Agreed	
C/075/02 Land to the rear of Maesglas	Keep in Cat4 until application determined.	Disagree. The site has just been brought into Cat3 this year as a result of this application which was submitted in December 2018.	Agreed	
C/124/02 Drefach Road (western)	Been in study over 5 yrs. Only outline application for one plot recently. Move to Cat3 other than the 1 unit	Agree. 1 units in 2021 and 9 in Cat3.	Agreed	
D/004/10 Land opposite Plough & Harrow, Betws Road	Site been in study over 5 yrs. outline consent expired move to Cat3	The site is in Cat3.	Sorry Agreed	

LPA Ref / Address	HBF Comments	CCC Response	HBF Further comments	CCC Response
D/004/29 Former Police Station	Note site complete but under 5 units so should not be included in figures, should be in small sites.	As the site is an allocation in the LDP I have included it here. Happy to move to small sites, but I thought it was better contained in the large sites as there was a trace over what was delivered on the site.	OK as long as it not double counted. TAN1 says '4.3.2 Normally only sites with a capacity for 10 or more dwellings will be included in the studies, but a Study Group may agree a lower limit if it believes that this is more appropriate for the area. In rural areas it has become the practice to include in the studies sites of 5 or more dwellings. However, the site thresholds must align with those in the adopted LDP to allow for consistent monitoring.'	The site is not double counted, it only appears in this study.
D/004/40 Land off Colonel Road, Betws	Has application for 3 dwellings been approved, numbers in schedule to reflect this.	Not yet been approved and the application isn't on the whole site.	Ok Agreed	
D/069/01 Land adjacent Tegeirian	Less than 5 units why in study?	For the same reason as the Police Station site, it is an allocation. Am happy to move to small sites if that's what is done by other authorities.	OK as long as it not double counted. TAN1 says '4.3.2 Normally only sites with a capacity for 10 or more dwellings will be included in the studies, but a Study Group may agree a lower limit if it believes that this	The site is not double counted, it only appears in this study.

LPA Ref / Address	HBF Comments	CCC Response	HBF Further comments	CCC Response
			is more appropriate for the area. In rural areas it has become the practice to include in the studies sites of 5 or more dwellings. However, the site thresholds must align with those in the adopted LDP to allow for consistent monitoring.'	
D/092/05 Danycrug	Are annual delivery rates realistic , reduce to 10 a year with remainder in Cat3.	Agree	Agree	
D/093/07 Land off Kings Acre, Kings Road	Last year said work commenced but still no units shown as under construction?	The permission is valid in perpetuity as works have commenced on the application. The developer, however, is not on site.	Site has been in study over 5 yrs so needs to be certainty that is going to be developed have you contacted the developer?	Agree to move to Cat3, unable to contact developer.
D/146/09 Emlyn Brickworks Site	Been in study five years. When were units last built on site? Has S106 taken longer than a year to sign? A interest from a developer is not really enough to justify numbers in Cat 2 of study.	8 units were completed in 2017. There have been many meetings with a developer (Low Carbon Construction) on the site with Planning Officers and there is a current issue with surface water drainage which is being finalised before permission is issued. The developer is confident of a much higher rate of delivery than that stated in the proforma. I would	Agreed	

LPA Ref / Address	HBF Comments	CCC Response	HBF Further comments	CCC Response
		suggest the completion rate remains as suggested.		
D/150/01 Land adjacent Cresselly Arms	3 dwellings built some time ago is there a valid planning permission for other units if not move to Cat3.	There is a current application in to extend the time to submit Reserved Matters on the original outline application, this application has not yet been determined. I would suggest the completion rates get pushed on a year, so that they read 5 in 2021, 5 in 2022, and 5 in 2023.	Agreed	
D/172/02 Adj Dyffryn Glas	Been in study over 5 yrs. no planning move to Cat3.	Agree	Agreed	
L/085/09 Land adj to Brodawel	Been in study over 5 years application to extend time not enough to keep in Cat 2 move to Cat3.	Agree, move to Cat3.	Agreed	
L/152/04 Land at Ty'n y Waun Farm	Why proposed split only planning for six dwellings, 2 years at 4 a yr then jump to 10 a yr.	It is assumed that once the development of the frontage is completed, then the development of the rest of the site will follow. Would suggest, however to reduce the number of units to 4 in 2024, and then 18 in Cat3.	Agreed	
L/155/12	why 10 in 2024 and rest in Cat3?	The site is Council owned and is currently being marketed.	Agreed	

LPA Ref / Address	HBF Comments	CCC Response	HBF Further comments	CCC Response
Land adj Llwynpiod, Bancffosfelen				
L/178/13 Land between 22 & 28 Bethesda Road	Been in study over 5 yrs. with most recent consent and extension of time, after which owner plans to sell site so no intention of developing it, move to Cat3.	Agree. Move to Cat3.	Agreed	
L/180/11 Fforestfach	Has planning permission expired if so move to Cat3.	Work has commenced on the site in line with planning permission S/27674 and is therefore valid in perpetuity. However, Haywood Homes have put in an amended planning permission to change the layout (S/38544).	Agreed	

Consultation with Dŵr Cymru Welsh Water

Dŵr Cymru Welsh Water Response

As was the case with last year's JHLAS, I note that you have taken into account previous discussions that we have had with regard to the positioning of sites within the site schedules, and as such I have no specific comments to make. I would advise that if you haven't already, please take into account our comments as part of the planning application process for any of those sites that have achieved planning consent.

Corrections / Amendments

L/003/05 Dolau Fan	Capacity of site should be 5, and number of units remaining 4.
L/001/103 Llys yr Hen Felin (remaining land)	Capacity of the site should be 27, number of units under construction remains at 20.
C/002/47 54-55 Water Street	Site should be in the small sites, as there is a gain of 4 units not 5 as stated.

Appendix 3
Site Proformas