



# Carmarthenshire Local Development Plan

## Addendum to Schedule of Matters Arising Changes Written Statement



**June 2014**

## Addendum to Schedule of Matters Arising Changes – Written Statement

The following addendum to the Matters Arising Schedule relates only to MAC31 and MAC32. It has been prepared in light of an addendum to the Housing Clarification Paper (H2p) and its amendments in respect of a mathematical error and further clarification of the LDP's housing land supply.

MAC31	SP5	5.9.37 – 5.9.41	<p>Amend paragraphs 5.9.37 to 5.9.42 as follows:</p> <p><b>Housing Supply</b></p> <p><del>5.9.37 The following section sets out the housing land supply for the LDP. In so doing it incorporates the projected household requirement as the basis for the number of units required together with the aforementioned uplift. It also factors an allowance for contributions from small sites provision and windfall sites. The potential for existing permitted sites to contribute to meeting the housing requirement is accounted for (in addition whilst not technically subject to a permission these sites pending the signing of a 106 agreement may also make an important contribution). Information on permitted sites indicates that there are some 5,104 units subject to valid planning permissions across the defined settlements on sites of 5 units plus (source: Carmarthenshire County Council). Whilst this figure will be the subject of continual monitoring (given that their contribution will vary as permissions are granted and lapse) it provides an informative indication of supply across the County.</del></p> <p><del>5.9.38 The contribution of completions on 5 plus sites (during the plan period) to the residential housing land requirement is recognised. Appendix 3 identifies those allocated sites where completions will have occurred. For example, where dwellings have been completed on a 5 plus site since the 1<sup>st</sup> April 2007 they will contribute to the site allocation as well as the overall land supply figure for the LDP. Information on completions as derived from the JHLAS together with site based survey work have been used to identify the contribution of completions (as part of residential allocations) in meeting the overall housing supply figure. It should be noted that in instances where a site is part completed prior to the plan period the remaining dwellings (5 or more units) have been allocated in this LDP. Also instances may occur where a site has been fully completed during the plan period and once again the contribution of such sites forms part of the residential housing land requirement.</del></p> <p><del>5.9.39 The following table provides an indication of the levels of contribution from permissions and completions against the overall requirement by Tier.</del></p> <table border="1" data-bbox="521 1209 1653 1369"> <thead> <tr> <th colspan="5" style="background-color: #800000; color: white;">Allocations and Contributions by Tier</th> </tr> <tr> <th>Tier</th> <th>Non-Committed</th> <th>Commitments<sup>1</sup></th> <th>Commitments: Completed<sup>2</sup></th> <th>Allocation (Units)</th> </tr> </thead> <tbody> <tr> <td>Growth Area</td> <td>5,124</td> <td>3,123</td> <td>1,090</td> <td>8,247</td> </tr> <tr> <td>Service Centre</td> <td>781</td> <td>573</td> <td>270</td> <td>1,354</td> </tr> </tbody> </table>	Allocations and Contributions by Tier					Tier	Non-Committed	Commitments <sup>1</sup>	Commitments: Completed <sup>2</sup>	Allocation (Units)	Growth Area	5,124	3,123	1,090	8,247	Service Centre	781	573	270	1,354	To reflect considerations emerging through the examination.
Allocations and Contributions by Tier																								
Tier	Non-Committed	Commitments <sup>1</sup>	Commitments: Completed <sup>2</sup>	Allocation (Units)																				
Growth Area	5,124	3,123	1,090	8,247																				
Service Centre	781	573	270	1,354																				

Local Service Centre	994	672	116	1,666
Sustainable Communities	1,257	736	356	1,993

<sup>1</sup>Source: Carmarthenshire County Council

**Table 2**

<sup>2</sup>Source: JHLAS and Carmarthenshire County Council

5.9.40 The contribution of windfall sites is potentially significant. The UDP included an allowance of some 530 dwellings (35 units per annum) during the plan period for windfall sites (the estimate was based upon past trends). Completion rates on windfall sites prior to the economic downturn indicated a notable rise with 452 units being completed during the period between 1st July 2005 and 30th April 2008 (32 months) equating to approximately 169 per annum. This represents a steep increase from the UDP allowance and is reflective of the then economic upturn with increased land values and the implementation of regeneration proposals. Given the above it is prudent to balance this increased potential annual contribution against the lower figure which is currently set out in the UDP. The latter recognised previous trends and figures and took account of the potential consequences of a prolonged period of economic slowdown whilst allowing sufficient scope in the event of recovery. Therefore an average between that set out in the UDP and the recent completion rate of 169 per annum provides a reasonable and balanced figure and results in an allowance of 1530 (102 per annum). Existing consented windfall sites are (where they conform to the preferred strategy) accommodated within the LDP as part of the residential housing land requirement.

5.9.41 An annual allowance for small sites (those defined as being capable of accommodating less than 5 dwellings) of approximately 97 units is provided. This is based on a review of the initial allowance (as derived from the UDP and utilised within the JHLAS) and reflects an assessment of small site contributions within the defined settlements together with an additional 5% flexibility. The continued contribution of small sites will be monitored. Reference should be had to the content of Appendix 11 in relation to the spatial distribution of small sites.

The housing land supply requirement for the LDP (2006 – 2021) is as follows:

(a)	Overall LDP Housing Requirement	<b>15,197</b>
(b)	Uplift	1,043

**Housing supply (not met through H1 allocated sites)**

(c)	Windfall allowance (5 or more dwellings)	1,530
(d)	Small Sites Allowance (4 or less dwellings)	1,450
(e)	Total (c + d = e)	2,980

**Residential Housing Land Requirement (a + b minus e) – 13,260**

5.9.42 Consequently the LDP provides a framework for the development of 16,240 residential units with 13,260 provided through identified housing land allocations. The overall requirement incorporates an uplift on

previous build rates and is considered a reasonable and appropriate level of provision which is robust and deliverable in respect of the identified requirement.

### **Housing Supply**

The following section sets out the housing land supply for the LDP. In doing so, it incorporates the projected household requirement as the basis for the number of units required, together with the aforementioned flexibility (uplift). It also factors in contributions from the windfall allowance. The housing supply is made up of the following elements:

### **Carmarthenshire Local Development Plan - Housing Supply 2006 – 2021**

<u>Housing Allocations</u>	<u>13,352</u>
<u>Windfall Allowance</u>	<u>2,426</u>
<u>Small site Component (less than 5 dwellings)</u>	<u>(1,111)</u>
<u>Windfall Component (5 or more dwellings)</u>	<u>(1,315)</u>
<u>Total Housing Supply</u>	<u>15,778</u>
<u>Housing Requirement</u>	<u>15,197</u>
<u>Flexibility</u>	<u>581</u>

### **Housing Allocations**

A key source in meeting the identified housing land requirement is through sites allocated for residential development within the LDP in the form of Housing allocations as identified through policy H1 or as part of a mixed use allocation as set out within Policy EMP6.

The LDP has identified the contributions which committed sites make between the period 1<sup>st</sup> April 2007 and 31<sup>st</sup> March 2012. Information on committed sites indicates that there are 5,034 units subject to valid planning permissions across the defined settlements on allocated sites of 5 or more dwellings. Whilst this figure will be the subject of continual monitoring (given that their contribution will vary as permissions are granted and lapse) it provides an informative indication of supply across the County as at 31<sup>st</sup> March 2012.

Furthermore, the contribution of completions on allocated sites between the 1<sup>st</sup> April 2007 and 31<sup>st</sup> March 2012 to the residential housing land requirement is also recognised. Information on completions as derived from the JHLAS, together with site based survey work has been used to identify the contribution of completions in meeting the overall housing supply figure. It should be noted that in instances where a site is part completed prior to the plan period, the remaining dwellings within that site where they are for 5 or more units have been allocated within the LDP. The following table outlines the contribution from permissions and completions against the overall requirement across the settlement hierarchy.

<u>Settlement</u>	<u>Windfall allowance (sites of under 5 units)</u>	<u>H1 Allocated Sites</u>			
		<u>Completed</u>	<u>Commitments</u>	<u>Allocations (Non-Committed)</u>	<u>Total</u>
<u>Carmarthen (GA1)</u>	<u>122</u>	<u>162</u>	<u>354</u>	<u>1500</u>	<u>1854</u>
<u>Llanelli (including Llangennech) (GA2)</u>	<u>200</u>	<u>471</u>	<u>1537</u>	<u>2390</u>	<u>3927</u>
<u>Ammanford / Cross Hands (GA3)</u>	<u>55</u>	<u>501</u>	<u>1219</u>	<u>1333</u>	<u>2552</u>
<b><u>Total (% of housing allocation within the Growth Areas)</u></b>	<u>377</u>	<u>1134 (13.61%)</u>	<u>3110 (37.32%)</u>	<u>5223 (62.68%)</u>	<u>8333 (100%)</u>

<u>Settlement</u>	<u>Windfall allowance (sites of under 5 units)</u>	<u>Completed</u>	<u>Commitments</u>	<u>Allocations (Non-Committed)</u>	<u>Total</u>
<u>Burry Port and Pembrey</u>	<u>6</u>	<u>113</u>	<u>207</u>	<u>206</u>	<u>413</u>
<u>Llandeilo (incl. Ffairfach, Rhosmaen, Nantyrhibo)</u>	<u>8</u>	<u>0</u>	<u>6</u>	<u>257</u>	<u>263</u>
<u>Llandovery</u>	<u>40</u>	<u>0</u>	<u>0</u>	<u>111</u>	<u>111</u>
<u>Newcastle Emlyn</u>	<u>17</u>	<u>0</u>	<u>0</u>	<u>89</u>	<u>89</u>
<u>St Clears (Incl. Pwll Trap)</u>	<u>9</u>	<u>93</u>	<u>184</u>	<u>95</u>	<u>279</u>
<u>Whitland</u>	<u>12</u>	<u>68</u>	<u>182</u>	<u>23</u>	<u>205</u>
<b><u>Total (% housing allocation within Service Centres)</u></b>	<u>92</u>	<u>274 (20.15%)</u>	<u>579 (42.58%)</u>	<u>781 (57.42%)</u>	<u>1360 (100%)</u>

<u>Settlement</u>	<u>Windfall allowance (sites of</u>	<u>Completed</u>	<u>Commitments</u>	<u>Allocations (Non-Committed)</u>	<u>Total</u>
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	<u>under 5 units)</u>					
<u>Laugharne</u>	<u>10</u>	<u>0</u>	<u>66</u>	<u>16</u>	<u>82</u>	
<u>Ferryside</u>	<u>10</u>	<u>8</u>	<u>8</u>	<u>24</u>	<u>32</u>	
<u>Kidwelly</u>	<u>10</u>	<u>45</u>	<u>111</u>	<u>190</u>	<u>301</u>	
<u>Trimsaran</u>	<u>21</u>	<u>3</u>	<u>70</u>	<u>94</u>	<u>164</u>	
<u>Pontyates / Ponthenri / Meinciau</u>	<u>29</u>	<u>1</u>	<u>39</u>	<u>200</u>	<u>239</u>	
<u>Pontyberem</u>	<u>25</u>	<u>8</u>	<u>13</u>	<u>127</u>	<u>140</u>	
<u>Hendy / Fforest</u>	<u>10</u>	<u>21</u>	<u>74</u>	<u>145</u>	<u>219</u>	
<u>Glanaman / Garnant</u>	<u>39</u>	<u>29</u>	<u>164</u>	<u>83</u>	<u>247</u>	
<u>Brynamman</u>	<u>15</u>	<u>0</u>	<u>8</u>	<u>99</u>	<u>107</u>	
<u>Llangadog</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>27</u>	<u>37</u>	
<u>Llanybydder / Ty Mawr</u>	<u>16</u>	<u>0</u>	<u>39</u>	<u>59</u>	<u>98</u>	
<b><u>Total (% housing allocation within Local Service Centres)</u></b>	<u>195</u>	<u>125 (7.5%)</u>	<u>602 (36.13%)</u>	<u>1064 (63.87%)</u>	<u>1666 (100%)</u>	
<b><u>Settlements</u></b>	<b><u>Windfall allowance (sites of under 5 units)</u></b>	<b><u>Completed</u></b>	<b><u>Commitments</u></b>	<b><u>Allocations (Non-Committed)</u></b>	<b><u>Total</u></b>	
<b><u>Total (% housing allocation within Sustainable Communities)</u></b>	<u>447</u>	<u>342 (17.16%)</u>	<u>743 (37.28%)</u>	<u>1250 (62.72%)</u>	<u>1993 (100%)</u>	

**Windfall**

The windfall allowance can be characterised in two ways. The first relates to the potential contribution of sites of less than five dwellings within defined development limits. It is noted that such sites have not previously been monitored within the county, however the number of units completed on such sites will in future be recorded as part of the annual JHLAS and monitored accordingly through the LDP. For the period 2006-2012

		<p><u>the JHLAS has applied an allowance of 77 dwellings per annum which has equated to some 462 units being completed on small sites through to 2012. A recent assessment of the contribution of such small sites in respect of the LDP has been undertaken and indicates that there is a residual small site contribution of 649 for the remainder of the Plan period through to 2021.</u></p> <p><u>Such sites make an important contribution to the overall housing supply, introducing an important element of choice and flexibility into the housing market, including opportunities for self-build housing. Its contribution is however particularly notable in the smaller settlements where opportunities for plus 5 developments are limited. Reference should be had to the content of Appendix 11 in relation to the spatial distribution of small sites.</u></p> <p><u>With respect to windfall contributions through sites of five or more dwellings such sites have traditionally made an important contribution to housing delivery within Carmarthenshire. Evidence indicates that for the period 2006 – 2007, 159 windfall units were completed.</u></p> <p><u>In allocating sites for housing within the LDP, the Council sought to provide certainty by allocating the majority of UDP windfall sites (where they accorded with the site assessment methodology) as H1 – Housing Allocations. This left only 76 completed windfall dwellings during this period. This figure can be added to the windfall allowance for the period 2007-2013.</u></p> <p><u>In assessing the potential windfall (5 or more) for the remainder of the Plan period 2013-2021, the Council has sought to use historic evidence to establish an allowance for this period. The trend of 84no.of completed windfall dwellings from previous years provides a realistic indicator for the remaining 8 years of the Plan. Based on this trend it is considered that 672 windfall dwellings will be forthcoming. This is considered prudent as the LDP will undoubtedly have windfall sites emerging similarly to that within the UDP. Furthermore, there are a number of windfall sites within Carmarthenshire which are known to have planning permission, or are subject to planning applications which are pending a decision, but do not contribute to the housing allocation provision within the Plan. The background evidence has provided the reasoning to indicate a potential of 408 windfall dwellings from this source. In combining the three elements of windfall (5 or more) as set out in the Council’s Housing Clarification Paper H2p (as amended), the LDP considers a total allowance of 1,315 dwellings to be appropriate from all windfall sources during the Plan period.</u></p>	
MAC32	SP5	<p>Amend Policy SP5 as follows:  <b>In order to ensure the overall housing land requirement of 15,197 for the plan period 2006-2021 is met, <u>provision is made for 16240 15,778</u> new dwellings.</b></p> <p><b>Sufficient land is allocated (on sites of 5 or more dwellings) to accommodate 13,260 <u>13,352</u> dwellings in</b></p>	<p>To reflect considerations emerging through the examination and in the interests of clarity.</p>

accordance with the Settlement Framework.

Table 3

Growth Areas	<del>8,333</del> 8247
Service Centres	<del>1,360</del> 1345
Local Service Centres	1,666
Sustainable Communities	1,993