



Geraint John Planning

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Representor ID: 5752

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By Email: LDPExamination@carmarthenshire.gov.uk

C/O Corrine Sloley
LDP Programme Officer
Carmarthenshire County Council
Planning Services
Civic Offices
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Dear Sir / Madam,

CARMARTHENSHIRE COUNCIL LOCAL DEVELOPMENT PLAN EXAMINATION

RESPONSE TO MATTERS AND ISSUES – MATTER 2: PROSPEROUS PEOPLE AND PLACE – HOUSING AND COMMUNITY INFRASTRUCTURE

Please find enclosed on behalf of from the landowners and promoting parties (Ms H Wight, Ms C Dudlyke, and Ms G Searles), a submission to the Examination of the Local Development Plan (LDP) in relation to ref. T3/9/h4 and SR/015/004 at Land South of Cwmgarw Road, Brynamman.

This submission comments on matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Matter 2: Prosperous People and Places – Housing and Community Infrastructure.

We look forward to attending the Hearing Session in respect of the matter above in due course. In the meantime, we hope and trust that all is in order with the submission. Please do not hesitate to contact us in the event that further information is considered beneficial.

Yours sincerely,

Geraint John
Director
Geraint John Planning Ltd

PREFACE

This submission relates to the matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Matter 2: Prosperous People and Places – Housing and Community Infrastructure.

Each of the relevant issues raised in relation to the above matters are considered in detail below.

This Submission

It should be noted that these submissions do not respond to every question raised within the Inspector's Agenda, as not all of these questions necessitate a response by us, and/or earlier submissions made on behalf of the Landowners (Representor ID. 5752) are considered sufficient to address the matters raised. Accordingly, these representations only provide responses to questions where it is considered necessary and relevant to do so.

For clarify, please note that we have not responded to the following questions/issues identified under Matter 2:

- Question 2: (Parts C, D, E & F)
- Question 3: Rate of Delivery in Housing Trajectory
- Question 4: (Part C)
- Question 5: (Part C)
- Question 6-10: Housing Distribution and Development
- Questions 11-12: Community Infrastructure

QUESTIONS

Issue - Is the provision and distribution of housing soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?

Housing Provision

1. Is the housing requirement figure identified in Policy SP4 appropriate?

- e) How has the requirement figure of 8,822 been derived? And is it based on robust and credible evidence?**
- f) In identifying the requirement figure, has adequate regard been paid to the most recent Welsh Government household and population projections?**
- g) Have alternative housing growth scenarios been considered? If so, why have they been discounted, and why has the preferred option been chosen?**
- h) Has the requirement figure been informed by a robust assessment of the main local influences on housing demand in Carmarthenshire including, household formation size, migration levels, and vacancy rates?**

A joint response to all parts of question 1 is set out below.

The housing requirement figure of 8,822 over the lifetime of the Plan (i.e. 15 years, from 2018-2033) is based on 'balanced growth centred on the delivery of communities' needs, and the delivery of the region and the Council's strategic and regeneration objectives' (The Deposit Plan, para. 9.9). The figure has been derived from the ten-year based projection from Turley's Housing and Economic Growth Report. This projects an overall population increase of 14,468 over the LDP period 2018-2033. The housing requirement figure of 8,822 is equivalent to the delivery of 588 homes per year within the Plan period. This figure results in the annual homes requirement being 17.3% higher than the

historic trend on completions. Accordingly, it is considered that the housing requirement is aspirational, and therefore, sound and deliverable sites must be allocated in the Plan in order to meet this figure over the Plan period.

It is acknowledged that in order to deliver the number of homes outlined above, the Preferred Strategy includes an additional flexibility as part of its supply to ensure the delivery of the requirement figure. Accordingly, a 10% flexibility is proposed, which increases the housing supply to 9,704 to deliver the 8,822 homes. The inclusion of a 10% flexibility allowance is supported, as it will ensure that the Plan can deliver the Anticipated Annual Build Rate (AABR) throughout the Plan period and is resilient and adaptable in the event of any unforeseen circumstances or issues. It is considered that the AABR can comfortably accommodate the prescribed growth over the Plan period as a result.

Given the above, the site promoter is of the view that the housing requirement figure identified in Policy SP4 is appropriate, and is based on robust and credible evidence.

2. Is the housing land supply figure identified in Policy SP4 appropriate?

a) What is the make-up of the housing supply? Should this be outlined in the reasoned justification of Policy SP4 and, where appropriate, do all the components have the same base date?

This representation does not make comments on the specific make-up of the housing supply as a whole, but rather the omission of the candidate sites (ref. T3/9/h4 & SR/015/004) at Land South of Cwmgarw Road within Policy HOM1 'Housing Allocations' and the 'Reasonable Alternatives'.

Firstly, it must be noted that this representation does not repeat the previous submission / objection made at Deposit Plan stage, but rather provides an update on the status of the site / proposed development following the Deposit Plan consultation. Previous representations were made at Deposit Plan relating to the site's credentials, and overall acceptability of the proposal, against the Assessment Criteria and Methodology of submitted candidate sites.

As set out within the Deposit Plan representations, the proposed development of this currently allocated site was refused by CCC (LPA ref. PL/04459), with the reasons for refusal summarised below:

- Insufficient evidence to demonstrate acceptable visibility at access (as a result of a lack of any TRO);
- Biodiversity net loss; and
- Lack of commitment to secure community benefits.

Our client's response to the above reasons for refusal was set out in detail within the previous representations, which also formed the basis / argument for the appeal of the refusal – which was made subsequent to the Deposit Plan representations.

The appeal was ultimately dismissed by PEDW on 9th April 2024, however, only 'biodiversity net loss' was considered to be an issue by the Inspector. The other reasons for refusal were not considered to be issues by the Inspector. Accordingly, biodiversity is the only residual issue to be resolved to deliver the allocated site.

Given this, and in response, further ecological assessment is being undertaken by our clients to determine an acceptable scheme, which, in turn, will seek to deliver the required biodiversity net gain at the site. It is not considered that the ecological baseline conditions of the site are insurmountable in any event, and a resolution can be achieved with the appropriate mitigation and enhancement measures in place. The sole matter outstanding in respect of the delivery of the site is not a

fundamental one, and is a matter of the balance between developable land and biodiversity mitigation and enhancement.

Given the above, it is considered that the proposed scheme is in an advanced position, whereby feedback on the acceptability of the proposal has been received by both the LPA and PEDW. As such, and as outlined above, ecology is the only residual issue that is to be addressed before planning permission can be granted for the scheme. The proposals are developed and detailed as a result of the planning and appeal submissions, and should planning permission be granted, the site will be able to yield a high number of affordable and market homes within the Plan period.

As a result, it is considered that the site is both acceptable and deliverable to retain its allocation in the RLDP. Accordingly, the site would contribute to the housing supply identified by the Council, and represents a suitably located site to deliver much-needed affordable and market housing in Brynamman.

3. Will the Plan deliver the housing requirement?

a) Are the site allocations available and deliverable within the anticipated timescales? Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?

The site at 'Land South of Cwmgarw Road' sits within the settlement of Brynamman, which is identified as a Tier 2 Settlement (Service Centre) within Cluster 3 'Amman and Upper Gwendraeth'. The other settlements that fall within the same categorisation are Glanamman / Garnant and Pontyberem / Bancffosfelen.

It is noted that within the proposed housing allocations, there is only 1no. proposed allocated site within Brynamman for residential development – Heol Gelynen ref. SeC9/h2. This site will provide 8no. units, 100% of which will be affordable, however, the site is not expected to yield until year 11-15 in the Plan period. Accordingly, there will be no delivery of new housing in the settlement of Brynamman until 2031-32 at the earliest. As such, it is considered that the provision of 8no. units in Brynamman over the Plan period represents a shortfall and deficiency in the delivery of housing to meet ever-increasing local needs in the settlement.

The re-allocation of the site at 'Land South of Cwmgarw Road' is considered to be deliverable, as set out previously. If re-allocated it would yield housing in full within the Plan period. Accordingly, the site would provide a significant contribution to the delivery of both affordable and market housing within the settlement of Brynamman, which, in turn, will considerably address local need.

In respect to the other Tier 2 settlements within Cluster 3, there are 4no. allocations identified across the two settlements (Glanamman / Garnant and Pontyberem / Bancffosfelen). In the settlement of Glanamman / Garnant, the 2no. allocated sites are expected to deliver 12no. (ref. SeC10/h1) and 8no. (ref. SeC10/h2) units respectively, with the former already completed as set out in the Housing Trajectory of the Deposit Plan. The other site is expected to be completed in the year 2024-25. Accordingly, there will be no further delivery of affordable or market housing in this settlement beyond year 2024-25. With regards to Pontyberem / Bancffosfelen, again, there are 2no. allocated sites (ref. SeC11/h1 and ref. SeC11/h2), with the latter already completed (19 units). The former allocation is expected to yield in the year 2028-29, and will deliver 15 units in the Plan period. On the whole, given the completions to-date, and the expected end of Plan period (end of 2024-25 year) yield of other sites, there will only be a further 23 units to be delivered in the Plan period within the above settlements.

In light of the above, it is considered that across the Tier 2 settlements in Cluster 3, there is a considerable and marked under-provision of housing within the Plan period. As set out, a total of 62

units are allocated in the Plan period, of which 39 have already been completed / to be completed by 2024-25. There is a remainder of 9 years in the Plan period, where it is expected in the housing trajectory that 23 units will be delivered. This would equate to the delivery of 2.5 units per annum in this part of the County for the remainder of the Plan period, which could not be considered sufficient to meeting the housing needs of the local population. It is therefore considered that this represents a shortfall in housing provision, not least that the settlements are identified as 'Service Centres' within the Settlement Hierarchy of the RLDP.

This is a particular concern in respect to the soundness of the Strategy of the Plan, not least as Issue 18 within the Issues, Vision and Objective Topic Paper sets out that there is a lack of new homes being built in some Service Centres and Local Service Centres. Accordingly, it is considered that there is a lack of provision for both affordable and market homes in the settlements, particularly Brynamman, within the Plan period. This has been clearly identified as an issue, has been evidenced to be an issue, and the Plan accordingly needs to address this.

In terms of the alternative reasonable sites, it is noted that 2no. sites are identified on the register that are located within Garnant (ref. SR/064/011 and SR/064/017). Whilst the inclusion of these sites is not disputed, it is considered that, should the site not be allocated / re-allocated in the RLDP, at the very least it should be on the Reasonable Alternatives list. As identified in Appendix A (Candidate Site Assessment), the site scores well in all aspects, and there are no identified insurmountable constraints that would preclude the delivery of the site. Moreover, as set out in these representations, the site is in an advanced position, whereby it has been determined through the appeal that ecology is the only residual issues to be addressed. Work is going by the site promoters to address the ecological position, and a further application will be made accordingly to bring the site forward for development at the earliest opportunity.

Accordingly, it is considered that should it be determined the site should not retain its allocation, given both its acceptability and deliverability, the site should (at the very least) be identified as a 'Reasonable Alternative' in the RLDP.

b) Should committed sites be allocated?

As set out within the Growth and Spatial Distribution Topic Paper (April 2024), 'Commitments' are sites which are defined as *"those sites which have been built since the base date of the Revised LDP, or those with an extant planning permission."* Accordingly, committed sites form part of the housing supply in the RLDP.

The Growth and Spatial Distribution Topic Paper sets out the overarching details on the spatial distribution of allocations and commitments within the County in the Plan period – as illustrated in the table below.

Tier	(a) Allocated	(b) Commitment	(c) Total	Percentage of Commitments per Tier (=b/c*100)
Tier 1	1573	2345	3918	59.85%
Tier 2	577	1611	2188	73.63%
Tier 3	376	342	718	47.63%
Total	2526	4298	6824	62.98%

Table 4- Distribution of Housing Allocations and Commitments by Tier

As shown in the table above, across the three Tiers, the majority of the housing supply is made up by commitments (62.98% to be precise). This represents a considerable reliance on committed sites

coming forward in the Plan period and yielding in order to meet the overall housing requirement. Moreover, it is noted that there are 2578 units with planning permission forming part of the housing supply, but have not yet had any completions. This represents a significant number within the context of the wider housing requirement in the Plan period.

As set out in Appendix 3 of the Growth and Spatial Distribution Topic Paper, a total of 1831 units are either under construction (111 units) or have been completed up to 2022-23. Accordingly, this leaves a figure of 2467 committed units to come forward in the Plan period. It is noted that the annual completion rate in the most recent year (2022-23) dropped significantly in comparison to preceding years. This outlines that the annual completion rate for the remainder of the Plan (which is between 246 and 393 units up to 2031-32) may not be robust, or at least reliable to yield housing in the period. Accordingly, it is considered that committed sites should not be relied upon to deliver housing in the Plan period, specifically at the level currently set out (62.98%), and more allocated sites should form part of the housing supply. This would ensure that there is greater flexibility built into the Plan to ensure that the overall housing requirement is met within the Plan to meet local housing needs.

Housing Distribution and Development

4. Is the spatial distribution of new housing development sustainable and coherent?

c) Is the spatial distribution of housing allocations and windfall opportunities consistent with the identified settlement hierarchy? And are the tables contained in Appendix 7 accurate?

As set out in these representations, only 62no. units allocated in Cluster 3 Tier 2 settlements, of which 39no. have been / will be completed by 2024-25. Accordingly, this leaves a residual figure of 23 units to be delivered in the Plan period. Importantly, these settlements are identified as 'Service Centres' which are considered to be play an important function in the delivery of housing in the Plan period.

Accordingly, in order to meet local pressing needs, it is considered that further provision for housing should be made available in the housing supply in these areas. Specifically, the site at 'Land South of Cwmgarw Road' is considered to represent an optimal and sound solution to deliver homes in this location / area of Carmarthenshire, as evidenced by its existing allocation, the PEDW appeal decision, and the LPA's assessment of the site against the ISA Objectives (which can be found in Appendix A).

APPENDIX A – CANDIDATE SITE ASSESSMENT

