

CARMARTHENSHIRE
REVISED LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION

Hearing Session 3 – Prosperous people and Places – Affordable Housing and Gypsy and Traveller Provision

Thursday, 17 October 2024 between 10:00 and 17:00

Action Point	Council Response / Proposed MAC	Inspector's Comments
AP3/1	<p>Following the site hearing sessions a further appraisal of the affordable housing figures has been undertaken which has a consequential amendment to the overall provision of the target in Policy SP5.</p> <p>The two changes include:</p> <p>Emlyn Brickworks PrC3/MU1 – Change from 44.25 affordable units to 33.75 affordable units. This is to reflect 7 units on the land with planning permission for 70 dwellings and the remaining land for 107 dwellings (25% AH targets). The calculation was initially the 25% affordable target on the whole 177 units identified in policy HOM1.</p> <p>Llangain – SuV8/h1 – The developer is on site. They are constructing 27 affordable units within the 36-dwelling scheme. It had previously been calculated as 10.8 AH units – which comes from the 30% AH target considered with the initial outline permission.</p>	

Policy SP5 would require a consequential change from the provision of the target of 1,930 affordable homes presented in the examination session to **1,936** affordable homes following the update. The new breakdown is shown below, and consequential amendments made to the table within Policy HOM1.

	Affordable Units
Cluster 1	381.11
Cluster 2	691.4
Cluster 3	336.23
Cluster 4	33.78
Cluster 5	39.84
Cluster 6	145.76
Total	1628.12
Large Windfall	166
Local Need	142
Total	1936.12

Amend Policy SP5 to the following

Strategic Policy – SP 5: Affordable Homes Strategy

The Plan will maximise the delivery of affordable homes up to 2033 through the provision of a ~~minimum~~ target of 1,936 ~~1,900~~ affordable homes. This will support the development and enhancement of sustainable, balanced communities.

11.116 Whilst the LDP and planning system seeks to support the delivery of affordable homes, it is only one of few mechanisms used to meet this need. This is reflected in the Council's Affordable Housing Delivery Plan which

	<p>sets out a five-year vision for delivering affordable housing. The LDP's contribution to the target is set out in SP5 through:</p> <ul style="list-style-type: none"> • On-site provision of affordable housing as a percentage of the overall development, or on sites acquired by social housing providers; • Off-site affordable housing in lieu of on-site provision; • Commuted sum contributions to support the delivery of affordable housing; and • Local Need housing. <p>New paragraph Number: In combining all methods of affordable housing contributions through the planning system the target set out in Policy SP5 is the starting point for the provision of Affordable Housing within the county, with the Plan seeking to maximise the provision where applicable.</p> <p>11.117 Reference is also made to the Carmarthenshire Rural Needs Study 2019 which identifies a higher proportion of larger dwellings within the rural areas that contribute to higher house prices⁵² The LDP looks to support the growth of more affordable units within the rural communities to promote development for first time buyers or those in low-income households.</p>	
AP3/2	<p>Amendment to Policy AHOM1</p> <p>AHOM1: Provision of Affordable Homes On-site Contributions An on-site contribution towards affordable housing will be required on all market housing allocations and windfall sites of 10 or more homes to meet the affordable housing target set out in Policy SP5. The percentage target level for affordable housing is based on the scale of development:</p> <p>a) sites comprising 10 – 19 homes will be required to provide an affordable housing contribution of 10%;</p>	Change agreed

- b) sites comprising 20 - 50 homes will be required to provide an affordable housing contribution of 12%;**
- c) sites comprising 51 – 100 homes will be required to provide an affordable housing contribution of 20%;**
- d) sites of 101 homes or more will be required to provide an affordable housing contribution of 25%.**

~~The affordable housing target percentage noted is a target to be used as a starting point for affordable housing negotiations.~~

~~Where adjacent and related residential proposals result in combined numbers meeting or exceeding the above thresholds, the Council will seek an element of affordable housing based on applying the above target percentages to the aggregate number of dwellings.~~

~~Proposals will be required to ensure that the dwelling remains affordable for all subsequent occupants in perpetuity.~~

Commuted Sums

A commuted sum towards affordable housing will be required from proposals comprising 1 – 9 dwellings. Commuted sum charges will be based on floor space (cost per sq.m).

Proposals for single dwellings categorised as 3-bed, 4-person dwellings or smaller, and less than 88 square metres will be exempt.

~~Where the above requirements cannot be achieved due to their impacts upon a proposal's financial viability, a variation may be agreed on a case-by-case basis.~~

	<p>11.118 Policies AHOM1 and AHOM2 aim to assist the Council to meet its housing need and in particular to deliver the affordable housing need identified in Policy HOM1.</p> <p>11.119 The policy sets out the affordable housing contributions to be provided. The requirements of the policy reflect the findings of the Revised LDP's ongoing Viability Study and takes into consideration other factors such as the LHMA, past delivery rates and the need for flexibility to allow for variances between sites.</p> <p>11.120 The Policy's requirements for on-site contributions apply to all proposed housing developments located within settlement boundaries with a capacity to deliver a net increase of 10 dwellings or more new homes. Those sites which fall outside of the settlement boundaries will be subject to the requirements of Policy AHOM2.</p> <p>New paragraph number: The affordable housing target percentage noted within the policy is a target to be used as a starting point for affordable housing negotiations.</p> <p>New paragraph number: Where adjacent and related residential proposals result in combined numbers meeting or exceeding the above thresholds, the Council will seek an element of affordable housing based on applying the above target percentages to the aggregate number of dwellings.</p> <p>New paragraph number: Proposals will be required to ensure that the dwelling remains affordable for all subsequent occupants in perpetuity.</p> <p>11.121 The policy's requirements for commuted sums apply to all proposed open market proposals resulting in a net increase of 1 – 9 new dwellings, with the exception of single dwellings which are categorised as 3-bed, 4-person homes and not exceeding 88 square metres in internal, habitable floor space.</p>	
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	<p>11.122 The mix of dwelling sizes, types and tenure required to be provided on each site will vary according to the specific needs of the locality at the time of application. This will need to take into consideration the latest information on housing need from the LHMA, alongside any relevant local information such as the Council's waiting list and any recently delivered affordable housing units within the area</p>	
AP3/3	<p>AHOM2: Affordable Housing- Exceptions Sites</p> <p>Proposals for 100% affordable housing development on sites adjoining the development limits of defined settlements (Tiers 1-3 in Policy SP3), and in those settlements identified as Rural Villages (Tier 4) settlements will, in exceptional circumstances be permitted where it is to meet a genuine identified local need (as defined within the Glossary of Terms) and where:</p> <ul style="list-style-type: none"> a) The site represents a logical extension to the development limits and is of a scale appropriate, and in keeping with the character of the settlement; b) The benefits of the initial affordability will be retained for all subsequent occupants; c) It is of a size, scale and design compatible with an affordable dwelling and available to low or moderate income groups; d) There are no market housing schemes within the settlement, or projected to be available which include a requirement for affordable housing. <p>New paragraph number: All new affordable local need housing will be restricted to those who can demonstrate they have a need to live in the Town and Community Council area and are in Affordable Housing Need. Reference is drawn to the Glossary of Terms which considers the Local Need Eligibility, and the criteria which must be satisfied to permit local need housing.</p>	Change agreed.

	<p>11.123 The granting of planning permission will be subject to conditions and planning obligations which ensure the affordable housing remains available to meet future local affordable housing needs.</p> <p>11.124 An affordable dwelling must be compatible with WG’s Design Quality Requirement standards to limit its size, scale and design to ensure that the dwelling falls within a reasonable and acceptable affordable dwelling cost for future occupants. In exceptional circumstances, A departure from these standards may be considered appropriate where they are to meet the occupant’s needs and are clearly evidenced and justified.</p>													
AP3/5	<p>Strategic Policy – SP 10: Gypsy and Traveller Provision</p> <p>The following Local Authority sites are allocated to meet the identified need for Gypsy and Traveller Accommodation and to allow for the potential future expansion of Gypsy and Traveller Households:</p> <table><tr><th>Site Ref:</th><th>Location</th><th>Type of Need</th><th>Proposed pitches</th></tr><tr><td>PrC2/GT1</td><td>Land at Penyfan, Trostre, Llanelli</td><td>Residential</td><td>7 pitches</td></tr><tr><td>PrC2/GT2</td><td>Penybryn (extension), Bynea, Llanelli</td><td>Residential</td><td>6 pitches</td></tr></table> <p>11.211 To consider the future Gypsy and Traveller provision within Carmarthenshire, the County Council has undertaken two Gypsy Traveller Accommodation Needs Assessment (GTAA) which identify the current unmet need for Gypsy and Traveller pitches within the County. The initial report was undertaken in 2015 to cover the period up to 2031, whilst the</p>	Site Ref:	Location	Type of Need	Proposed pitches	PrC2/GT1	Land at Penyfan, Trostre, Llanelli	Residential	7 pitches	PrC2/GT2	Penybryn (extension), Bynea, Llanelli	Residential	6 pitches	
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	<p>2019 update ensures that the Plan is informed in terms of Gypsy and Traveller need for the Plan period through to 2033.</p> <p>11.212 The Assessments consider the methodology set out by Welsh Government Guidance and outlines two types of the assessment of need; the first considers the first 5 years of the GTAA period; and the second considers the full 15 year GTAA period.</p> <p>11.213 Based on the 2019 Gypsy and Traveller assessment, the current unmet need is for 19 pitches, whilst Carmarthenshire's estimated provision for the first 5 years is for 23 additional pitches. A large proportion of this need has arisen from households living in bricks and mortar, and new household growth from within these households. The make-up of this need is located within Llanelli, where a large number many of these households had previously lived on the public site at Penybryn.</p> <p>11.214 An estimate has also been made for newly arising Gypsy and Traveller households in years 6-15 of the GTAA. This would include, for example, young adults living on existing sites who, in time, will form their own households and therefore would require their own pitch. The GTAA estimates a need for 8 further pitches in years 6-15, totalling a requirement of 31 pitches through to 2033.</p> <p>New paragraph number: The County has seen a significant change within the accommodation needs for Gypsy and Travellers with a total of 27 pitches being granted planning permission. In addition to the proposed 13 pitches allocated on the Council sites identified in Policy SP10 it is considered that the requirement set out within the 2019 GTANA can be met up to the end of the plan period in 2033.</p> <p>11.215 The GTAA also looked at the accommodation needs for Travelling Showpeople within Carmarthenshire. This element of the assessment identified 9 authorised or tolerated pitches for Travelling Show people within the county. In considering the future projection, the 2019 assessment</p>	
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	<p>identifies a requirement of 4 additional pitches in the first five years of the assessment.</p> <p>11.216 The requirement and take-up of pitches will also be closely monitored as part of the monitoring framework of this plan and reported through the Annual Monitoring Report arrangements.</p>	
AP3/5	<p>GTP1: Gypsy and Traveller Accommodation</p> <p>4. Proposals for new Gypsy and Traveller sites, or extensions to existing authorised sites within the development limits of a defined settlement will be permitted where:</p> <ul style="list-style-type: none"> a) The necessary range of facilities and services, including existing community, social, and educational provisions, and public transport is accessible or can be readily provided; b) The proposal will have no significant adverse impacts on the amenity of residents and adjoining land uses; c) The site is capable of being serviced with water, electricity, sewage and waste disposal; d) There is no adverse effect on its surroundings, landscape/townscape or the setting and integrity of the historic environment. <p>2. New, or extensions to existing authorised sites outside the development limits of defined settlements will be permitted in accordance with the above criteria, where it can be demonstrated that there are no suitable pitches available on existing authorised sites., within the development limits of a defined settlement. or that there is no opportunity to appropriately extend those sites.</p>	Change agreed.

	Proposals for a transit or touring site will be considered where they have good connections to the Strategic Road Network.	
AP3/6	Please see appendix 1 below which refers to the briefing note.	Agreed.

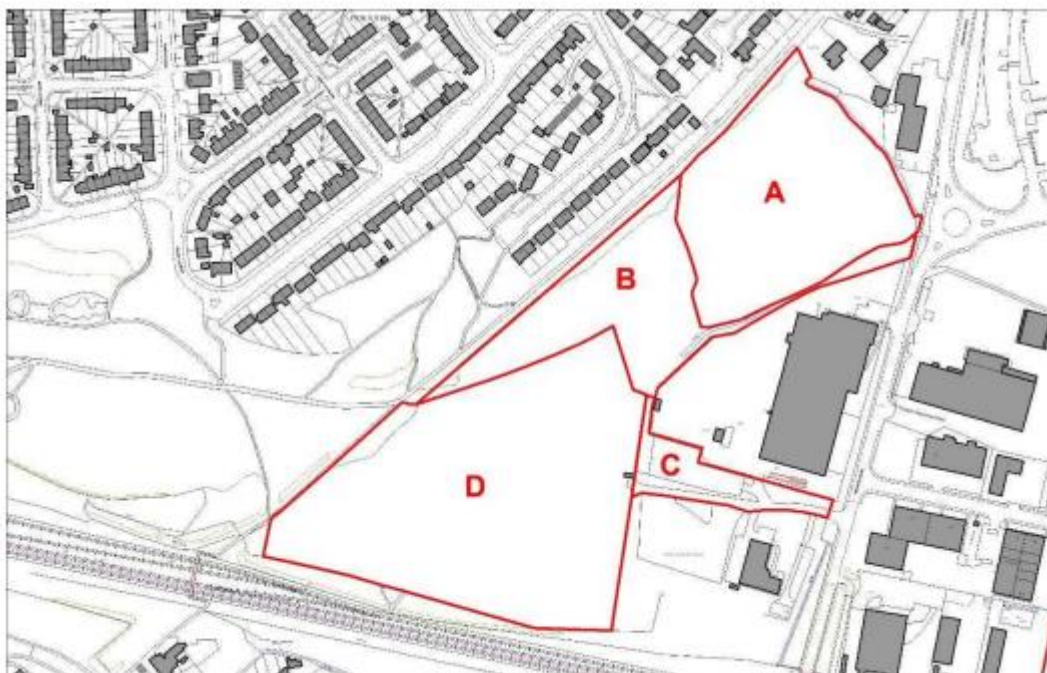
Appendix 1 - Action Point AP3/6 – Briefing note in relation to the development of PrC2/GT1 - Land at Penyfan, Trostre, Llanelli

This Briefing Note considers the updated position relating to the Land at Penyfan, Trostre which is one of two Council owned sites allocated for Gypsy and Traveller pitch provision within the Revised Local Development Plan.

Further to Action Point AP3/6 from Hearing Session 3 of the examination of the Carmarthenshire rLDP, the following information has been requested.

Land Ownership

Reference is drawn to Submission Document CSD118 which considers the sites for Gypsy and Traveller Provision and the review of Local Authority sites. The land at Penyfan, Trostre proceeded to a stage 2 assessment. At stage 2 a more detailed assessment was considered and showed the land within the ownership of the Council. The map below shows the land ownership as presented in the Council's statement for Hearing Session 3.



The allocation of the Gypsy and Traveller site is contained within sections B and D. Area B and C are owned by the Local Authority.

Area B is an irregular parcel of land behind Trostre Depot and measures 0.85ha.

Area C is the access point between Trostre Depot and the Lord Arthur Rank Centre.

Area D is within private ownership and is identified as disused recreational land, although it is overgrown and not maintained to allow any recreational and sporting use. This land was previously within Council ownership prior to its sale. This land measures 2.9ha in size and it relatively flat in nature.

Site Layout

An indicative plan is presented below to indicate that there is potential for 7 pitches to be accommodated on the Council owned land with access provision to be developed on the southern side of the site and immediately to the rear of Trostre Depot. These 7 pitches are reflected within Policy SP10.

A further plan is provided below which shows the Public Rights of Way which runs in a Northeast to Southwest direction and immediately adjacent to the site.

Constraints

In considering the discussion with Hearing Session 3 the following information is provided.

Coal Mining

Reference is drawn to the map below which shows the High and Low Development Risk Area for Coal Mining. The High-Risk Development Area skirts the north-western side of the Council owned land and covers approximately 37% of this land. Whilst no assessment has been considered at this stage, it would be a requirement of any planning application to be accompanied by a Coal Mining Risk Assessment to consider if any mitigation would be required.

Ecology

The site area is covered with overgrown bushes, shrubs and small trees. Detailed ecological and habitat assessments have not been undertaken on the site and these matters are to be considered at the planning application stage. In considering the site for the allocation of Gypsy and Traveller sites, NRW did not object on ecology and habitat grounds.

Contaminated Land

The Contaminated Land Officer has provided updated comments. There are various former industrial land uses on the site, and within the surrounding area. There is no fundamental objection to the site's development, however, the site is situated within a coal authority defined reporting area and is at potential risk from mine gases. Given this site setting, the officer would recommend that an appropriate contaminated land risk assessment (and if necessary, a remediation strategy) is submitted as part of any future planning applications for the development. The risk assessment will have to include a mine gas risk assessment that complies with the CL:AIRE guidance document 'Good Practice for Risk Assessment for Coal Mine Gas Emissions; October 2021'.