

CARMARTHENSHIRE
REVISED LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION

HOUSING SUPPLY

The purpose of this note is to outline our preliminary findings in respect of the housing supply (HS) contained in the emerging Carmarthenshire Revised Local Development Plan (RLDP) and to seek the Council's view on the approach to be taken to ameliorate the issue identified.

National Guidance

The Development Plans Manual (DPM) recognises that it will be extremely rare for all sites identified in a plan to come forward in the timescales anticipated and that there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites. To address these circumstances, the DPM requires that a flexibility allowance is identified and embedded into the plan. The Manual suggests that the starting point for the allowance could be 10% with any variation robustly evidenced and that the level of flexibility chosen when the LDP goes on deposit is broadly maintained upon adoption of the plan.

Background

The submitted RLDP through Policy SP1 outlines a housing requirement (HR) of 8,822 new dwellings to be provided in Carmarthenshire over the plan period. To meet the HR, the Plan makes provision for a HS of 9,704 dwellings. The HS includes a 10% flexibility allowance which equates to 882 dwellings. The policy is supported a trajectory which shows an average anticipated annual build rate (AABR) of 588 dwellings.

Details of the committed and allocated sites are contained in Policy HOM1, which identifies 192 sites which are intended to be developed over the Plan period. Over half of the sites identified are commitments, that is sites that are completed, under construction or have planning permission.

During the Examination, it became clear that the level of windfall development included in the HS for the plan period could not be achieved. As a result, the Council proposed the reduction of the windfall figure (which includes small and large sites) from 2,880 to 2,221 dwellings. A net reduction of 659 dwellings.

Based on the submitted evidence and that presented in during Hearing Session 2, we agree that the allowance for windfall development for the plan period up to March 2024 has not been achieved and the HS should be amended to reflect the revised figures for small and large sites.

The reduction of the windfall allowance would reduce the HS from 9,704 to 9,045 dwellings and, in doing so, lower the flexibility allowance to some 2.5% (223

dwellings). As a consequence, the Council's statement indicates that the make-up of the HS would be altered, with 4,565 dwellings provided by committed sites, 2,259 dwellings by allocated sites, and 2,221 dwellings by windfall sites.

The Council's statement for HS2 concluded that, given the robustness of the supporting evidence presented in respect of each of the allocated and committed sites, a 2.5% flexibility allowance would be sufficient to ensure the deliverability of the HS at the rate outlined in the housing trajectory over the plan period.

Considerations

On the basis of the evidence presented in respect of windfall sites, which includes data in relation to urban capacity, settlement boundaries and the review of committed sites, we are satisfied that these elements are capable of contributing 2,221 new dwellings to the HS over the plan period.

Over the course of Hearing Sessions 7 – 12, we heard concerns from representors about the approach taken to rolling forward allocated sites and the impact that matters such as ecology, flood risk, phosphates, reclamation works, highway access and land ownership may have on the delivery of allocated sites. We have also heard the evidence presented by the Council in support of these sites. These discussions have drawn into question the ability of some allocated sites to be delivered in the manner and timescales envisaged in the Plan.

Predicting the delivery rate of new housing is not an exact science and, for reasons including those outlined by representors, the sites may be subject to delays resulting in a shortfall in provision against the AABR. The risk of such a delay is compounded by the make-up of the HS which places significant reliance on the delivery of committed sites which only benefit from outline consent and allocated sites which it has been suggested are subject to a range of constraints. Although we are satisfied that these sites will come forward over the plan period, we remain concerned that the development may differ in scale from that intended and / or be subject to protracted approval / construction periods.

To safeguard against any potential delay in the delivery of sites, the Council is proposing the inclusion of a 2.5% flexibility allowance in the HS. This level of flexibility would equate to less than one year of the average AABR. Should the flexibility allowance be required to address a reduction in the scale of development or further delay in the delivery of the allocated and committed sites in the early / middle phases of the plan period then it is likely that insufficient capacity would remain in the HS to address any other unforeseen shortfall in provision that may occur up to 2033.

For this reason, we are of the view that the flexibility allowance should be extended to a minimum of 10% (882 dwellings) with consideration being given to extending the provision further. This level of increase would ensure that sufficient land would be available to address any unforeseen circumstances that may occur and that the HS would be delivered during the plan period.

Way Forward

To address the requirement, the Council will need to identify site(s) capable of increasing the Plan's flexibility allowance to at least 10% (882 dwellings). Once the Council has identified land to meet this requirement, it should then undertake a 6-week public consultation exercise in respect of these additional sites. The consultation should be undertaken in accordance with the requirements set out in the RLDP Delivery Agreement.

The Council should submit details of the proposed additional sites, supporting evidence and a report outlining the findings of the public consultation exercise to the Programme Officer by 31 May 2025.

If you have any questions about the content of this note, please contact us via the Programme Officer.

Nicola Gulley and Ian Stevens

INSPECTORS

28/01/2025