



**CARMARTHENSHIRE REPLACEMENT LOCAL
DEVELOPMENT PLAN
EXAMINATION IN PUBLIC STAGE**

STATEMENT OF OBJECTION

**STRATEGIC POLICY SP4 – A SUSTAINBLE APPROACH TO
PROVIDING NEW HOMES**

On behalf of
Evans Banks Planning Ltd

Our Ref: SP4/EBP
Representation. No.: 5465
Representor ID: 4967
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1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Evans Banks Planning Ltd on behalf of its numerous Clients as a continued objection to the application of *Strategic Policy SP4 – A Sustainable Approach to Providing New Homes* of the *Carmarthenshire Revised Local Development Plan* (LDP). This Statement has been prepared in advance of our attendance of the relevant session of the Examination in Public and has been prepared in response to the Inspector’s issued ‘*Matters, Issues and Questions*’ document. The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Revised Deposit stage with respect to all of our respective Clients in relation to this Strategic Policy, which still stand.

2.0 PLANNING POLICY CONTEXT

2.1 NATIONAL PLANNING POLICY

- 2.1.1 In terms of all aspects of Development Plans, Planning Policy Wales (PPW) sets out at Paragraph 1.22 that they must “... *provide **certainty** for developers and the public about the type of development that will be permitted at a particular location.*”. Paragraph 1.26 then goes on to provide more specific guidance in relation to Local Development Plans, setting out that they should “... *set out a vision for how places are expected to change in land use terms to accommodate development needs over the plan period. This provides **certainty** for developers and the public about the type of development that will be permitted at a particular location.*”.
- 2.1.2 Planning Policy Wales (supported by the Local Development Plan Manual) identifies the process of establishing a level of housing provision a development plan should make during its lifetime. A key component of achieving the identified level of growth, is ensuring that any sites allocated for housing development are ‘deliverable’, with paragraph 4.2.11 defining a deliverable sites being “... *free, or readily freed, from planning, physical and ownership constraints and be economically viable at the point in the trajectory when they are due to come forward for development, in order to support the creation of sustainable communities.*”.
- 2.1.3 Notwithstanding the above, it is recognised by national planning policy that a degree of flexibility on the target level of housing supply to be delivered by a plan must be provided for. Paragraph 5.59 of the Local Development Plan Manual sets this level of provision as being 10% above the identified required level of need.

2.2 LOCAL POLICY

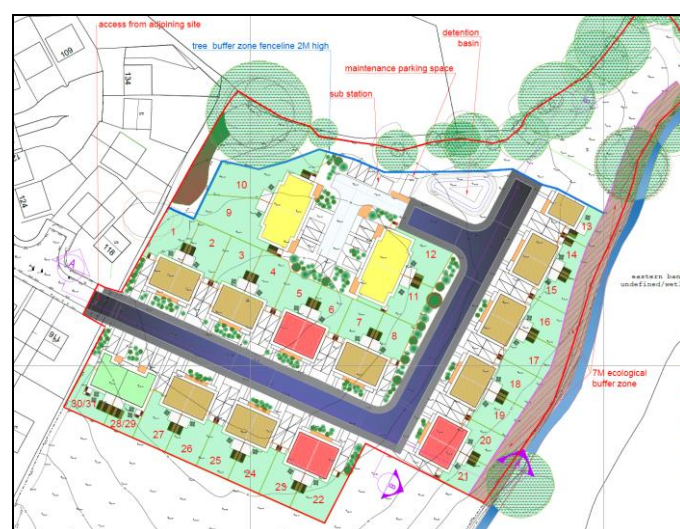
- 2.2.1 Strategic Policy SP4 reiterates that the Council considers that the overall housing requirement for the plan period is 8,822, with provision being made for a further 10% as required by the Local Development Plan Manual. The total figure the Council has made provision for within the Plan is therefore 9,704 residential units, with a heavy reliance being made on housing allocations under the provision of Policy HOM1.
- 2.2.2 The Council we understand therefore considers that the proposed allocations are able to deliver their assigned contribution with regards to the above figures.

3.0 DELIVERY OF STRATEGIC POLICY SP4 BY THE COUNCIL

- 3.1.1 As has been detailed in our original submissions on behalf of numerous Clients, it is clear that (a) the level of expected units from proposed allocations under the provisions of Policy HOM1 is questionable and (b) as is their delivery.
- 3.1.2 In addition to the questions raised by our original submission with respect to recently introduced requirements from Natural Resources Wales with regards to phosphates, we have significant concerns that the anticipated number of units assigned to proposed housing allocations have not given full consideration to the recently introduced requirements of Chapter 6 of *Planning Policy Wales*.
- 3.1.3 The aforementioned changes to national planning policy have resulted in significant physical challenges and constraints in delivering historical expected densities on housing schemes and allocations. It has recently been advised by the Authority's Ecology Officer on a planning application at Tirydail, Ammanford (LPA Ref. No. PL/06515) that where mature trees and hedgerows are present within and at the boundary of a site, such features and their root protection zones must be excluded from the development area and private garden space of a residential scheme. This is now to be a standard requirement by the Authority for residential developments throughout the County.
- 3.1.4 This has in turn then resulted in the net development area being reduced from the initial submission point (Plan A) to the site layout drawing now supported by the Ecology Officer (Plan B), as illustrated below.



Plan A



Plan B

3.1.5 No evidence has been presented by the Council to confirm that the above requirements have been applied to the housing allocations presented as part of the Revised LDP and that adjustments have accordingly been made to the anticipated level of units they are expected to deliver. In fact, as seen from separate submissions we have made with respect to a number of specific housing allocations, it is clear that this has not been done. The net result, on this basis alone, is that anticipated level of housing provision set out in Policy SP4 will not be delivered.

3.1.6 The above is further highlighted when our related submission with respect to proposed housing allocations is considered. On the basis of the evidence we have submitted, it is clear that a large number of units will not be delivered within the Plan period from the proposed housing allocations of Policy HOM1, with the sites and their assigned numbers reproduced below.

Ref. No.	Site Name	Anticipated Units
PrC1/MU1	West Carmarthen, Carmarthen	700
PrC1/h4	Land off Parc y Delyn, Carmarthen	17
PrC2/h1	Beech Grove, Pwll	10
PrC2/h4	North Dock, Llanelli	210
PrC2/h16	Ynys Las, Llwynhendy	33
PrC2/h22	Cwm yr Nant, Dafen	202
PrC2/h23	Dafen East, Gateway	150
PrC3/h4	Tirychen Farm, Ammanford	150
PrC3/h14	Nantydderwen, Drefach (Tumble)	33
PrC3/h36	Betws Colliery, Betws	66
PrC3/h22	Adj, Pant y Blodau, Penygroes	79
SeC1/h4	Cae Canfas, Heol Llanelli. Pontyates/Meinciau	8
SeC4/h2	Burry Port Harbourside	364
SeC6/h2	Land between Clayton Road and Bronalt Road, Hendy	20
SeC7/h1	Box Fam, Llangennech	7
SeC7/h3	Golwg yr Afon, Llangennech	50
SeC9/h2	Heol Gelynon, Brynamman	8
Se C12/h1	Trem y Dol, NCE	17
SeC12/h3	Land re/o Dolcoed, NCE	20
SeC13/h1	Adj y Neaudd, Llanybydder	10
SeC14/h1	Blossoms Garage, Pencader	20
SeC14/h2	Land adj. Maescader, Pencader	24
SeC17/h1	Land opp. Llangadog CP School, Llangadog	16
SuV1/h1	Adjacent to Fron Heulog, Cynwyl Elfed	8
SuV23/h2	Afj. Little Croft, Five Roads	25
SuV38/h1	Maes y Bryn, Capel Iwan	6
SuV39/h1	Adj y Hendre, Llanfihangel ar Arth	7
SuV60/h1	Land at College Bach, Llangynog	6

Table 1

3.1.7 The above amounts to a total of 2,266 residential units whose delivery within the Plan period is under significant question. This in turn amounts to over 23% of the anticipated number of new residential homes to be delivered under the provisions of Policy SP4 not being delivered through the provisions of the Replacement LDP.

3.1.8 Combined with the implications of Chapter 6 of PPW on those remaining deliverable proposed allocations, the above figures are extremely concerning and we continue to hold the view based on the proposals forming part of the provisions of Policy SP4,

the Replacement LDP fails all of the required Tests of Soundness for the reasons submitted.

4.0 TESTS OF SOUNDNESS

4.1.1 In summary, on the basis of the evidence submitted in and with this Statement, as well as that already submitted to the Authority, it is clear that the definition of Development Limits under the provisions of Policy SD4, in numerous instances, fails to adhere to the following Tests of Soundness, as required by the *Development Plan Manual*:

- Does the Plan fit?
- Is the Plan appropriate?
- Will the Plan deliver?

4.1.2 It is quite clear that the provisions of Policy SP4 for the reasons set out herein results in the Replacement LDP lacking clarity and in turn consistency. This then creates a document that will fail to deliver the anticipated level of growth, which is in turn not consistent with the guidance and requirements of national planning policy (particularly *Planning Policy Wales*).

4.1.3 As a result, the current provision of Policy SP4 is undeliverable and in numerous instances with regards to its and its supporting policies proposed provision, would result in the *Carmarthenshire Revised Local Development Plan* being unsound and all should be reviewed and amended, in the manner suggested in our original submissions.