

14 April 2023
Our Ref: 23.8004

Carmarthenshire County Council
Planning Services
Civic Offices
Crescent Road
Llandelio
SA19 6HW



By email: [REDACTED]

Dear Sir /Madam,

**Carmarthenshire Second Deposit Revised Local Development Plan
Representation on behalf of Barratt David Wilson Homes South Wales Ltd regarding Land off
Heol-y-Mynydd, Bryn (SR/086/053)**

We are pleased to submit this representation on behalf of Barratt David Wilson Homes South Wales Ltd ('BDW Homes') in response to the current consultation on the Carmarthenshire Second Deposit Revised Local Development Plan Consultation for the site Land off Heol-y-Mynydd, Bryn. The site is recorded in the 2023 Site Assessment Table under reference SR/086/053 (Land off Heol-y-Mynydd, Bryn).

Barratt Homes has an option agreement for the site, which has been promoted in part for residential development through the previous LDP process. This submission is also made alongside the recent representations in response to the Carmarthenshire Revised Local Development Plan 2018-2033. Candidate Site and Preferred Strategy consultations.

Executive Summary

- We do not support the Council's Strategic Policy SP4 housing requirement of 8,822 homes for the plan period (2018-2033). We consider the Plan Period should be rolled forward by a further two years, to 2021-2036, to take into account the time lost owing to the NRW intervention and COVID-19 pandemic.
- We do not support Policy HOM1 which includes a number of housing allocations located within Phosphate Sensitive Catchment Areas. The Council should reconsider their spatial distribution of housing allocations to include additional allocations outside of phosphate areas.
- Accordingly, Bryn can accommodate future growth requirements, and the land off Heol-y-Mynydd, Bryn should be included as an allocation.



We have set out our full response to the 2nd Deposit Revised Plan below as well as our response which was submitted as part of the previous Deposit Plan.

Paragraph 5.6 – A Carmarthenshire of Cohesive Communities

BDW Homes welcomes the recognition of the impact of the lack of delivery of new housing upon the creation of Cohesive Communities. The delivery of new homes and the maintenance of a five year supply of housing is essential to ensure that Cohesive Communities are created in line with the Well Being of Future Generations Act. It is therefore crucial that proposed site allocations within the Plan are deliverable. This is essential to ensure that the Plan accords with Test of Soundness 3. As identified in later sections BDW Homes raise a number of concerns regarding proposed Allocations and their impact upon the Council's proposed Trajectory and lack of deliverability which has effects Cohesive Communities.

Paragraph 6.4

BDW Homes is supportive of the proposed Vision for 'One Carmarthenshire' as it seeks to achieve an appropriate balance between environmental, economic, social and cultural objectives. The proposed Vision therefore complies with the holistic 'Placemaking' approach advocated by Planning Policy Wales (Edition 10, p.16). The Vision also accurately reflects the Well-being Goals set out within the WBFGA. BDW Homes particularly welcomes direct references within the Vision to securing prosperous, cohesive and sustainable communities and the economic aspirations associated with the Swansea Bay City Region.

Paragraph 7.6: Strong Connections - Strongly connected people, places and organisations that are able to adapt to change.

BDW Homes is supportive of the wording of Strategic Objective SO6, which seeks to ensure that 'The principles of spatial sustainability are upheld by directing development to sustainable locations with access to services and facilities..'. This Strategic Objective is therefore consistent with the 'Key Planning Principles' set out within Planning Policy Wales (Edition 10, p.18) which seeks to ensure that the planning system contributes to the long-term economic well-being of Wales, by making use of existing infrastructure and facilities.

Paragraph 7.6: Prosperous People and Places - To maximise opportunities for people and places in both urban and rural parts of our county.

BDW Homes supports Strategic Objective SO10, which refers to the delivery of an appropriate number and mix of new housing meet society's needs. The need to ensure that "there is sufficient housing land available to meet the need for new private market and affordable housing" is one of the key issues within the 'Active & Social Places' theme within Planning Policy Wales.

Paragraph 8.2

BDW Homes agrees that the use of the WG 2018-based subnational projections (4,359 homes) would impact upon the historic growth of the County and would not deliver the quantity of homes required. To this end, BDW broadly Homes supports the Council's Preferred Strategic Growth Option, the ten-year trend-based projection which would allow for 8,822 homes, on the basis that it seeks an ambitious

but achievable level of growth to support the aspirations of the Strategic Regeneration Plan for Carmarthenshire. However, BDW feels that a higher level of growth should be sought on the basis of the National Development Framework's aspirations for the South West National Growth Area, with its focus on the Llanelli Area and secondary town of Carmarthen.

Preferred Option – Balanced Community and Sustainable Growth Strategy

BDW Homes is broadly supportive of the 'Balanced Community and Sustainable Growth Strategy' and note that the strategy considers the role and function of settlements in seeking to assign growth. This should ensure that new housing is directed to those areas that are likely to attract higher levels of employment generation. In this regard, it is considered that more growth could be accommodated within the Llanelli and South Gwendraeth Area.

Paragraph 9.11

BDW Homes supports the strategy of building in flexibility to ensure the delivery of sustainable growth and to overcome any potential unforeseen deliverability issues, in line with national guidance. However, the Council should ensure that sites are viable and deliverable before they are taken forward as firm allocations in the LDP. There are concerns about several sites and their ability to contribute to delivering the housing growth projected over the Plan period. Paragraph 4.2.10 of PPW (Edition 10) states that, "The supply of land to meet the housing requirement proposed in a development plan must be deliverable."

Paragraph 11.79

It is acknowledged that windfalls can make an important contribution to the overall housing requirement for the County. However, in order to ensure the deliverability of the housing requirement then sufficient sites should be identified and allocated to meet this requirement. Windfall sites are unidentified by definition and therefore should form part of the flexibility allowance only.

Strategic Policy SP4: A Sustainable Approach to Providing New Homes

Draft Strategic Policy SP4 sets out the Council's overall housing requirement of 8,822 homes for the plan period (2018-2033) and so provision has been made for 9,704 new homes. Owing to the delays caused by COVID-19, which has resulted in a second Deposit Plan consultation, we consider it necessary for the plan period, currently set at 2018-2033 to be rolled forward to 2021-2036. Consequently, the Authority should consider the need for a higher provision of housing to accommodate the additional two years for the plan period. Carmarthenshire County Council (CCC) have noted that they consider that the Deposit Plan meets the 'Tests of Soundness' and so is in general conformity with Future Wales 2040. According to the Planning and Compulsory Purchase Act 2004 and set out within National Planning Policy, there is a fundamental requirement for any Local Development Plan to be found sound. To ensure that this policy meets the tests of soundness and is justified, and effective, those allocations located within phosphate sensitive areas should be removed and replaced with sites located outside of these areas.

To this end, BDW consider the inclusion of housing allocations within phosphate sensitive areas in the 2nd Deposit Revised Plan to be unsound as it fails the Council's own Test of Soundness in respect of:

- Test 2 the housing allocations located within phosphate areas are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales (PPW), and;
- Test 3 in allowing the inclusion of phosphate sensitive housing allocations the plan will not be implemented owing to the lack of an agreed mitigation measure for phosphorous sites. To this end, the projected housing figure will not be met.

To ensure the consistent delivery of dwellings, it is considered that additional sites should be allocated within the Draft LDP to provide a contingency, should some allocated sites fail to be delivered at the rate set out within the housing trajectory. This would ensure the consistent delivery of homes throughout the Plan period.

Policy HOM1: Housing Allocations

BDW objects to a number of proposed allocations owing to concerns in relation to their suitability and deliverability. The previous Deposit Plan response in relation to HOM1 has been set out below:

PrC2/h4

No progress of effort has been made to bring the site forward for a prolonged period. The site is not considered to be deliverable within the Plan period.

PrC2/h10

BDW objects to the proposed allocation of this site. We have serious concerns regarding its deliverability. The site is a former quarry and is covered by dense vegetation with complicated access arrangements which are affected by Flood Risk Zone C2 constraints. It has not been demonstrated that this site can be accessed without unacceptable flood risk consequences. The site is also brownfield in nature, and it should be demonstrated that appropriate ground investigation work has been undertaken to demonstrate that the site is viable and deliverable. The site should be removed as a draft allocation from the Deposit Revised LDP.

PrC2/h22

BDW objects to the allocation of this site. It comprises an existing allocation within the adopted LDP which is proposed to be 'rolled' forward by CCC. There is no evidenced justification for the continued allocation of this site, given that no progress has been made since its first allocation in 2014. The delivery of this site has been pushed back a year in every JHLAS since at least 201, which confirms the lack of progress and deliverability of this site. This site should be removed as a draft allocation from the Deposit Revised LDP.

PrC2/h23

The site is not deliverable during the plan period. It has a number of constraints, is not sustainable in terms of its location and it is not supported by a robust masterplan.

Sec5/h2

The site is constrained, is not viable and is not deliverable within the plan period.

PrC3/h4

This is an historic allocation and there has been little progress in bringing the site forward for development despite extensive marketing. The site is not deliverable within the Plan period.

PrC1/MU2

BDW is concerned that whilst this is a major urban extension to the south of Carmarthen, there is no confirmation that an end user is in place in the form of a residential developer to deliver the quantum of development proposed within the Plan period. The deliverability of this site is therefore questionable.

Phosphate Sensitive Catchment Areas

In addition to the above, BDW Homes wholly object to a number of additional housing allocations which fall within Phosphate Sensitive Catchment Areas. A detailed list of these housing allocations have been provided in Table 1: List of Housing Allocations in Phosphates areas, as well as our detailed response to each of the proposed housing allocation. A number of the sites have been included as housing allocations as they have gained planning permission. We do not agree with the inclusion of these sites as they should be listed as commitments. Similarly, those allocations included as they have a planning application submitted and pending should not be automatically included as an allocation. This is contrary to the tests of soundness, as those allocations being rolled forward within phosphate sensitive areas are currently not suitable nor deliverable owing to NRW phosphorous guidance.

With regards to CCC's efforts to solve the phosphate issue within the County, investigative work has been undertaken which forms part of the LDP evidence base. From reviewing this work, it is evident that CCC have no agreed mitigation measure to tackle the phosphate issue. A nutrient budget calculator has been constructed which calculates the phosphate levels that a proposed residential development in Carmarthenshire could produce. This is not a mitigation measure and so Carmarthenshire are yet to find a suitable phosphate solution.

In addition, a Nutrient Mitigation Options Technical Review (2022) has been prepared by Ricardo Energy & Environmental, outlining guidance on phosphorous mitigation options for use in Carmarthenshire. Although the report provides a short list and review of possible mitigation options no set option has been agreed upon. The report concludes *'it is likely that all schemes will require engagement with/by CCC, Natural Resources Wales, the Nutrient Management Board and developers. Other stakeholders like landowners/land managers, Dwr Cymru Welsh Water and environmental NGOs are likely to also have a role in delivery of specific solutions.'*

To this end, BDW Homes wholly object to the allocation of sites within Phosphate Catchment areas owing to the County having no established mitigation solution for development in phosphate areas. As such, all housing allocations which fall within phosphate sensitive areas should be discounted from the LDP, as these suits are not suitable nor deliverable. Additional more suitable sites should be sought which are located outside of the phosphate sensitive areas. Land off Heol-y-Mynydd, Bryn is a suitable location for development, being located adjacent to the settlement of Bryn/Llanelli and located outside a phosphate sensitive area.

Candidate Site Assessment - Land off Heol-y-Mynydd, Bryn (SR/086/053)

From reviewing the Candidate Site Assessment Table 2023 it appears Candidate Site (SR/086/053), Land off Heol-y-Mynydd, has been filtered out during the stage 2 assessment process, owing to concerns at the over intensification of residential development within the immediate area and that the site will remain outside of the development limits. We wholly object to this decision and perceive the assessment of the site as contrasting information in relation to the site's constraints. Owing to the allocation of two other sites within the settlement of Bryn, Maes Y Bryn (PrC2/h21) and Harddfan (PrC2/h20), CCC have confirmed Bryn is a suitable location for development. Both housing allocations will total 40 dwellings combined. Given Maes y Bryn benefits from planning permission for 34 dwellings and planning conditions are currently being discharged, this site should not count towards the housing provision of Bryn. On this basis, the proposed allocation of Land off Heol-y-Mynydd would not cause an over intensification of the settlement of Bryn.

The candidate site presents an opportunity for a logical continuation of existing residential development in Bryn. The Candidate Site is located within a sustainable location close to a number of facilities and good transport links. This is evidenced in the accompanying Technical Note prepared by Lime Transport confirms that desirable walking distances for commuting and school journeys is 500m, while the acceptable walking distance is 1km and 2km comprises the preferred maximum. The majority of roads in the vicinity of the Site (including Heol-y-Mynydd) accommodate pedestrian facilities, thereby linking the Site to all local services and facilities.

In terms of local services and facilities, the Site is situated approximately 400m from Bryn Community Primary School and 3km from Bryngwyn School. The Site is also situated 1.6km from Llwynhendy Health Centre, 600m from Bryn Post Office and 600m from Bryn Village Hall. The Site is also situated approximately 1.5km from Llwynhendy, which provides a wide range of services including a library, convenience store, public house and various takeaway restaurants, beauty salons and other retail stores. Llanelli Town Centre is situated 4km from the Site and Parc Trostre Retail Park is situated 3km from the Site, both of which provide a variety of services and employment opportunities.

With regards to public transport, Table 2.1 of the Technical Note by Lime Transport confirms that the Site is situated in close proximity (ranging from 450m to 1km) to a number of bus stops which provide regular services to Llanelli, Pontarddulais and Swansea among other destinations. Llanelli train station is also situated approximately 4km to the south-west of the Site, which is served by bus routes 110 and 111 which operate within the acceptable walking distance of the Site.

The submitted LVA states that due to recent and ongoing housing developments in the area, the development of Land off Heol-y-Mynydd would now represent a logical rounding off of the settlement boundary. Accordingly, we consider that Llanelli / Bryn is capable of accommodating a significant proportion of the County's growth over the next Plan period, and this Site is capable of making a significant contribution to this growth.

A concept masterplan has been prepared by Roberts Limbrick Ltd illustrating the site can accommodate up to 160 dwellings, open space, landscaping and associated infrastructure. This proposed scale of development would accord with the Deposit Plan in terms of the scale of strategic

site required to deliver the housing requirement. Additionally, it is considered to be an appropriate extension to the settlement in this location.

The site falls within Cluster 2: Llanelli and Southern Gwendraeth Area which has been identified as a 'national growth area' within Future Wales. To this end, with the potential for up to 160 dwellings to be delivered, this site is genuinely deliverable and can contribute to the identified housing need within the locality.

Final Remarks

Overall, BDW Homes raise a number of concerns regarding the current Preferred Strategy, including:

- We do not support the Council's Strategic Policy SP4 housing requirement of 8,822 homes for the plan period (2018-2033). We consider the Plan Period should be rolled forward by a further two years, to 2021-2036, to take into account the time lost owing to the NRW intervention and COVID-19 pandemic, and is contrary to Tests of Soundness 2 & 3.
- Significant objections are raised in relation to Policy HOM1 which includes a number of housing allocations located within Phosphate Sensitive Catchment Areas. The Council should reconsider their spatial distribution of housing allocations to include additional allocations outside of phosphate areas.

Consequently, support is provided for Land off Heol-y-Mynydd, Bryn, which is deliverable and developer lead, it has a developer on board and ready to take the site forward. Accordingly, Bryn/Llanelli can accommodate future growth requirements, and the land off Heol-y-Mynydd, Bryn should be included as an allocation.

We would be grateful if we could be kept informed on the further progress of the plan and further opportunities for engagement.

Yours sincerely,

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Principal Planner

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