

2nd Deposit Plan LDP Representations

Land South of Lon Fair, St Clears

April 2023

amity
planning consultants



INTRODUCTION	
	<p>This document supports the promotion of Land South of Lon Fair, St Clears. The Site would represent a significant contribution to meeting housing need and, in particular, the anticipated demand associated with the new hospital site being delivered in the area.</p> <p>Site lies outside but adjacent to the settlement boundary for St Clears/Pwll Trap. It is acknowledged that further sites should be allocated to meet the housing need in St Clears. Planning Permission has been recently granted for 64 dwellings (ref. PL/03374) on the land immediately to the north of the Site. The land was of agricultural use and the scheme is similar to the development hereby proposed in terms of scale, density and site constraints.</p> <p>This Site is being promoted jointly by Obsidian Homes, who are the developers of the land to the north, and the Site would consequently represent a natural second phase of the development. With a developer on board and site set-up costs and much of the infrastructure costs having already been absorbed by the development of the land to the north, the viability and deliverability credentials of the Site are excellent.</p>
PART A. CONTACT DETAILS	
Client	<p>This document is prepared on behalf of Obsidian Homes.</p> <p>All correspondence should be through the Agent.</p>
Agent name	Matthew Biggs.
Job title	Planner.
Organisation	Amity Planning Ltd.
Address	[REDACTED]
Telephone No.	[REDACTED]
Email address	[REDACTED]
Signed	[REDACTED]
Date	14/04/2023
PART B. YOUR REPRESENTATION	
Name/Organisation	Matthew Biggs, Amity Planning Ltd.
1. Which part(s) of the Plan (or supporting documents) are you commenting on?	
LDP Policy Allocation Numbers	Policy SP 1, Policy SP 3.

LDP paragraph or section numbers	N/A
LDP proposal map references	N/A
If your representation relates to a supporting document' including the: Sustainability Appraisal), and/or Habitat Regulations Assessment. Insert the name of the document and section reference(s) and/or paragraph number here.	N/A
2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements;	
I think the LDP is sound and meets procedural requirements.	No.
I think the LDP is unsound and should be changed.	Yes.
I think that the procedural requirements have not been met.	No.
3. Would you like the LDP to include a new policy, site allocation or paragraph?	
New site allocation	Yes.
New policy	No.
New paragraph or supporting text.	No.
4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).	
Site name	Land South of Lon Fair, St Clears.
Site reference	N/A

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why.

This document supports the promotion of Land South of Lon Fair, St Clears. The Site would represent a significant contribution to meeting housing need and, in particular, the anticipated demand associated with the new hospital site being delivered in the area.

Strategic Policy SP 1 sets out the preferred Spatial Strategy for Carmarthenshire. The focus of Policy SP 1 is on regeneration and growth, which reflects the Councils core strategic ambitions with development distributed in a sustainable manner consistent with the spatial strategy and settlement hierarchy. This confirms that the distribution of housing is sought to be directed to sustainably located areas, whereby there is a known potential for projected growth.

The Spatial Strategy identifies a settlement hierarchy to meet the identified housing requirement of 8,882 new homes. The strategy furthermore recognises the role employment plays in creating a prosperous County – with appropriate growth of housing with jobs and employment opportunities. This strategy has been informed by a number of ongoing assessments, through various sages leading up to its publication.

At Preferred Strategy stage (published December 2018) it was determined that a strategic growth option based upon a 'Population Growth Long Term' scenario would be the most appropriate option for the authority area. This was promoted by the authority on the basis that it would best assist in delivering the Plan's Vision and Strategic Objectives, driving sustainable housing growth and supporting the economic ambitions of the county. This scenario equated to a need over the revised LDP period for 9,887 dwellings on the basis of the variant vacancy rate.

These figures were based upon a *Population and Household Forecast Paper* published by Edge Analytics in October 2018 on behalf of the LPA in order to inform the Preferred Strategy, when NHS plans for a new super-hospital on the Pembrokeshire-Carmarthenshire border were at an early formative stage, and consequently were not accounted for within the forecast. The *Population and Household Forecast Paper* was updated by Edge Analytics in September 2019 to inform the 1st Deposit rLDP, which updated housing requirement scenarios in light of new evidence, including Carmarthenshire's 2018 mid-year population estimate and the consultation on the then draft National Development Framework. Again however this did not account for any growth associated with the new super-hospital.

In February 2023 the LPA published a *Population and Household Topic Paper* to inform the 2nd Deposit rLDP, which utilised data from a *Housing and Economic Growth Paper* prepared by Turley (with the support of Edge Analytics). This provided an updated analysis of housing need, reflecting the "WG 2018-based sub national population and household projections, in addition to other population estimated published since the first Deposit Revised LDP". Despite, however, the fact that the location for the new super-hospital had, by this stage, been narrowed down to just three sites within a 5 mile area (2 in Whitland, and 1 in St Clears), the implications of the hospital on housing need/growth was not a consideration in the adjustments to the figures.

Policy SP 1 projects a target of 9,704 new homes to meet the identified housing requirement of 8,822, informed by the above assessments. The aim of Policy SP 1 is to facilitate the delivery of new homes in sustainably located areas. The assessments which informed these projected figures were undertaken before the implementation of the hospital was confirmed in the area.

Therefore, the housing need is greater than what is identified, and the distribution of housing should furthermore be directed to sustainably located areas near the hospital.

Supporting text 11.11 of Policy SP 1 state that:

“by ensuring that our housing growth requirements are reflective of, and are in support of our economic ambitions, it allows for a co-ordinated and integrated approach to ensure that the shared role for economic growth is not in isolation of housing and vice a versa.”

It has been acknowledged that the search for a suitable location for the new hospital has made progress since the publication of the Preferred Strategy. The search has narrowed down to only three sites, all situated within a 5-mile radius of the promotion site. One of these sites is located just a few hundred meters away. (See fig.1 below). Considering the significant potential for job creation during both construction and operation that the hospital is expected to bring, it is imperative that the LDP is capable of providing adequate levels of new homes in sustainable locations near the hospital.

Fig.1 Proposed Potential Hospital Site

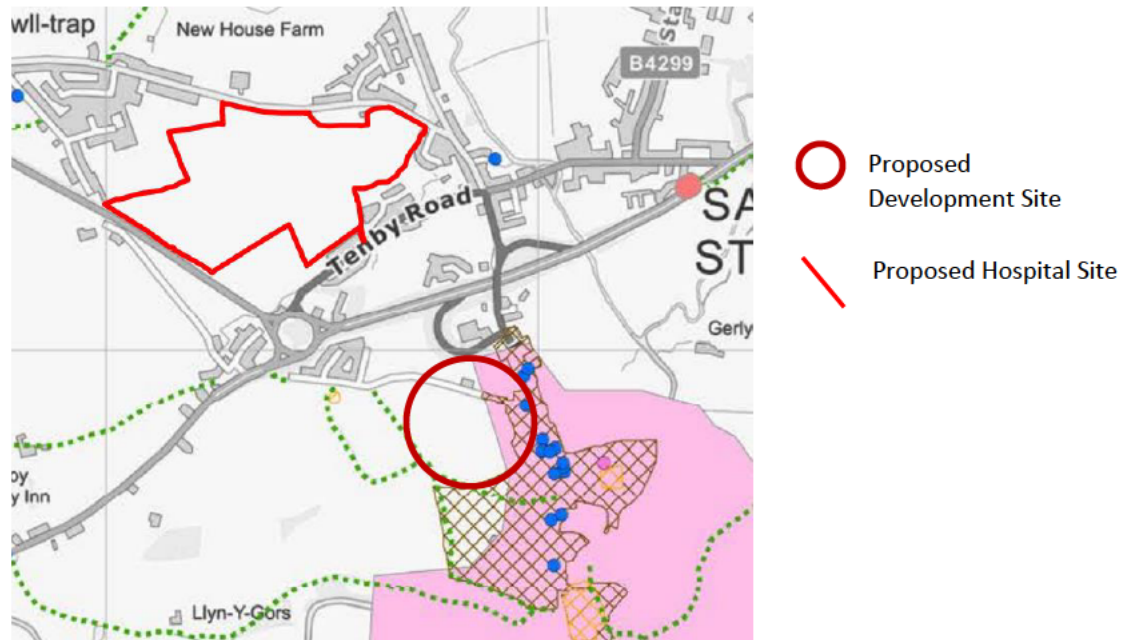


Fig.2 Proposed Potential Hospital Sites (St Clears & Whitland)



Strategic Policy SP3 outlines a settlement framework for the sustainable distribution of residential development.

Fig. 3 Settlement Framework

	Cluster 1	Cluster 2	Cluster 3	Cluster 4	Cluster 5	Cluster 6
Tier 1 – Principal Centre	Carmarthen	• Llanelli	• Ammanford/ Crosshands			
Tier 2 – Service Centre	• Pontyates / Meinciau / Ponthenri • Ferryside	• Kidwelly • Burry Port • Pembrey • Hendy / Florest • Llangennech • Trimsaran/ • Carway	• Brynamman • Glanamman / Garnant • Pontyberem / Bancffosfelen	• Newcastle Emlyn • Llanybydder • Pencader	• Llandovery • Llandeilo / Rhosmaen / Flairfach • Llangadog	• St Clears/ Pwll Trap • Whitland • Laugharne

Supporting paragraph 11.72 states that:

“The settlement framework will, in conjunction with specific policies, also guide the consideration of appropriate sustainable locations - with access to services and facilities - and scale of other developments (including employment).”

The proposed site has been classified as a Tier 2 Service Centre Settlement within Cluster 6 of the spatial plan. The primary focus of new development will be directed towards the upper tiers of this settlement hierarchy. The necessity for residential development in St. Clears, in order to be designated as a Tier 2 Service Centre was established through evidence of anticipated growth in the region, taking into account known employment growth levels. This was assessed before the hospital's implementation was confirmed. Thus, the inclusion and implementation of the hospital in this location has subsequently intensified the need for residential development in the area further than what is identified within the Revised Local Development Plan.

The proposed development site is capable of accommodating around 125 new homes, which would make a significant contribution to this critical objective. The site is furthermore sustainably located, and easily accessible. Considering the current housing demand, the proposed site is a suitable location for a substantial number of dwellings that align with the housing targets.

The promotion of this site for residential development would be consistent with the Preferred Strategy and support the planned growth of Carmarthenshire and St. Clears

Confirm here if you are submitting additional information to support your representation.

This representation will consist of the following documents;

- 2nd Deposit LDP Revised LDP Representation Form
- Candidate Site Representation Document
- 2nd Deposit LDP Representation Document (this document)

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

I do not want to speak at a public hearing and am happy for my written representations to be

No.

considered by the Inspector.	
I want to speak at a public hearing.	Yes.
If you want to participate in a hearing, indicate below what you want to speak about.	The promotion of this site (Land South of Lon Fair, St Clears) as an allocated site for residential development. Policy SP 1 and Policy SP 3.
I wish to be heard in Welsh.	No.
I wish to be heard in English.	Yes.