

Revised Carmarthenshire 2018-2033 Local Development Plan



This form should be used to submit comments in respect of the Draft Pre-Deposit Preferred Strategy. By providing as much information as possible it will help the Authority consider your representation more efficiently.

The submission period commences on Wednesday, 12 December 2018 and representations must be received by the deadline of 5:00pm on Friday, 8 February 2019. Submissions received after this deadline will not be considered. The Draft Preferred Strategy main document can be viewed using the new on-line consultation portal. This also allows comments to be made and is the Council's preferred method of comment as it will assist in the efficient processing of representations. However, submissions may also be forwarded by post or email using this form. This form is also available upon request at the Council's Customer Service Centres, and at the County's Public Libraries. Any continuation sheets or additional documentation should be securely attached and referenced.

If you have any queries relating to the submission form, please contact the Forward Planning Section at forward.planning@carmarthenshire.gov.uk or by telephone on 01267 228818.

Paper submissions should be sent to Forward Planning Section, Environment Department, 5-8 Spilman Street, Carmarthen, Carmarthenshire, SA31 1JY.

Please note that your submission cannot be treated as confidential and all submissions will be available for public inspection. Our privacy notice explains as clearly as possible what we do with your personal data. This is available on our website or upon request.

Office use only

Date Received:

Date Acknowledged:

Respondent Number:

Agent Number:



Name: Mr John Morris

Address: c/o Agent

.....
..... Post Code:

Organisation (where applicable):

Telephone:

E-mail:

Preferred method of communication Letter e-mail

Agent's Details (where applicable)

(If you nominate an agent, correspondence will only be sent to your agent).

Name: Michael Rees

Address: LRM Planning, 22 Cathedral Road, Cardiff

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..... Post Code: CF119LJ

Organisation (where applicable): LRM Planning

Telephone: [REDACTED]

E-mail: [REDACTED]

Preferred method of communication Letter e-mail

1. Please indicate to which aspect of the document does your representation relate?

Section: 7, 8 and Spatial Option Para No

Policy No. SP1, SP3 and SP4 Appendix:

2. Please specify whether you are supporting, commenting or objecting to the Draft Preferred Strategy.

Support Comment Object

Personal Details

Representation Details

3. If you are registering an objection to this document, please indicate precisely what change(s) you would like made to the selected section, paragraph, policy or appendix. (Please use a separate continuation sheet if applicable)

Please refer to additional information provided

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Representation Details

4. Please provide a summary of your representation below.

Please refer to additional information provided

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Comments

5. Please enter the full text of your representation below.

Please try to be clear, concise and relevant to the section, paragraph, policy or appendix you have selected. (Please use a continuation sheet if necessary)

.Please refer to appended sheets

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INTRODUCTION

These representations are submitted on behalf of Mr John Morris who controls land at Wuanfarlais Road, Llandybie.

Attached to this representation is a plan of land within the control of Mr Morris that we believe is suitable to be bought forward for development through the LDP Review (with supporting information). Mr Morris and his family were unable to submit a candidate site submission at the time of the original call for sites however, would like their site to be considered moving forward (and are undertaking separate pre-application discussions given that it is deliverable and viable.

Following are our additional and detailed comments / objections on individual elements of the Preferred Strategy as referred to within the questionnaire.

Section 7 A Vision for One Carmarthenshire & Section 8 Strategic Objectives

We are supportive of the vision for Carmarthenshire, however we are strongly of the view that it should specifically add ***“where the needs of residents are met”*** to the to the vision and objectives in line with PPW 10, as follows:

“To make provision for an appropriate mix of quality homes across the County to meet the needs of residents based around the principles of sustainable socio-economic development and equality of opportunities”.

Importantly, meeting the needs of residents will be key to achieving the wider Wales Well Being Goals in particular helping to create a more equal Wales, a more prosperous Wales, a more resilient Wales and a Wales of cohesive communities, as well as in meeting the requirements of the new PPW10 and the provision of the right development in the right place. Indeed, meeting needs in an appropriate and sustainable manner can contribute towards:

- Growing our economy in a sustainable manner;
- Making best use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities; and
- Limiting environmental impact.

Spatial Option

We are supportive of a hybrid option of the various scenarios presented. However, we are of the view that it ought to be more weighted towards the Pre-recession level of growth.

In the first instance we support the approach of ruling out the low growth options (WG 2014 based principal and 10 yr projections, PG Short term and 10 year projections). Such approaches would only reinforce such negative trends identified within the background paper.

We are concerned that the preferred approach should not limit aspirations or growth particularly given the trends that are have been experienced (affordability problems, loss of younger cohorts and trends towards an ageing population). Such an outcome would seem to be contrary to the Welsh Government's Well Being goals, the Placemaking objectives and the aims of the planning system. Indeed, for this reason we do not believe that the Pre-Recession Growth Projection should be ruled

out in its entirety on the basis that it is not achievable. If undeliverable sites are allocated then this will be the case for any of the scenarios.

Whilst our preference is to retain a positive and aspirational intervention that allows flexibility for growth, jobs, mixed communities and prosperity (in line with the vision and objectives of the LDP Review), should the current favoured option be carried forward then we are strongly of the view that it must rely upon a fresh and deliverable supply of homes. Indeed, relying upon existing allocations that have not been brought forward will not achieve the objectives rather it will reinforce the negative trends that have been experienced.

SP1: Strategic Growth & SP3: Providing New Homes

It is clearly a major requirement of PPW10 that great importance is placed upon the provision of homes, indeed, sustainable places cannot be facilitated without adequate provision. In this regard, PPW 10 recognizes the importance of a home to people's lives and indicates that Authorities must:

- identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;
- enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and
- focus on the delivery of the identified housing requirement and the related land supply.

Accordingly, it is important that an appropriate supply of homes is identified. As noted above, we are concerned that the revised requirement will not address key issues raised nor achieve the overarching aims of the Plan or its objectives. It is our view that it should be more aspirational and the hybrid option should lean towards higher job growth and economic development.

Notwithstanding our views on the level growth sought, it is clearly the case that based on the favoured option and given the issues identified within the LDP there are two key considerations that are inter related:

1. Flexibility allowance: The current level of flexibility (3.7%) was plainly insufficient, a greater level could have resulted in supply problems being addressed at an earlier stage.

Indeed, other Authorities have tended to lie between 10% to 20%, accordingly we are of the view that at least 15% should be used. This would reflect the fact that a number of the large strategic sites suffer from significant environmental & physical constraints and may not be brought forward.

A flexibility allowance of 15% would result in a need to identify at a supply pool of at least 11,370 dwellings that would be available and deliverable.

2. Delivery: Given the shortfall in supply it will be problematic to simply roll the existing supply pool forward to suit a lower housing requirement. Indeed, whilst this might *prima facie* provide a 5 year supply, it will not address the core issues nor meet the requirements of PPW (in terms of placemaking) and implement the aspirations. It will simply mean that the existing trends are carried forward. There are over 4000 dwellings in category 4 of the JHLAS, this is a considerable number that have failed to deliver within the LDP timeframe to 2021. It is strongly our view that a considerable number of these ought not be carried forward in a review.

We await the findings of the review of these sites in terms of viability and delivery. We would accept that if a large number of these sites were replaced with new allocations then our concerns over flexibility may be alleviated.

SP4: Affordable housing

We note that through the LDP there was a significant identified housing need (73% of the overall housing requirement). Given the shortfall within the LDP period and under delivery, absent any updated need survey, it seems clear that the existing level of need can only be increased.

Indeed, the most recent housing market assessment indicates that there will be a shortfall of 1,900 affordable homes a year for the next five years between 2015 and 2020. This includes 400 of these that are considered within the highest housing need and in total over the period equates 9,500.

As such it seems that the overarching housing need figure is likely to exacerbate issues of affordability. These issues were identified in 2009, were not addressed within the LDP and are unlikely to be addressed in the current approach, absent an overhaul of under-deliverable sites and identification of new allocations that can improve delivery.

*LRM Planning
February 2019*