



Sent Via Email

Date: 06.04.2023

Dear Sirs/Madam,

Persimmon Homes West Wales – Representations to the Carmarthenshire County Council Deposit Local Development Plan V2 2018-2033 Consultation

Introduction

Persimmon Homes West Wales write to submit these representations in respect of the current Carmarthenshire Deposit Local Development Plan (2018 to 2033) (“Deposit Plan”) consultation. As the Council will be aware, Persimmon Homes West Wales are actively promoting two additional candidate sites for residential allocation in the Deposit Plan, both of which have Option Agreements in place:

Land off Church Road, Gorslas (SR/067/002)

This submitted site is 2.7 hectares of undeveloped land, located to the north of Gorslas.

Land at Fforest Road, Fforest (SR/069/003)

Two options have been submitted for the site. The first forms 15.24 hectares and the second 4.5 hectares of undeveloped land which is situated directly adjacent to the eastern boundary and settlement building line of Fforest. Part of the site is allocated for housing in the adopted Carmarthenshire Local Development Plan (Site T3/7/h8).

Promotional documents were submitted as part of the candidate site submission which provide a full overview of each site.

Persimmon Homes are currently within the planning application process and delivering units on a number of sites which are detailed in the Deposit Plan – of which are relevant commentary on these is provided below.

This letter focuses on the key concerns with the Deposit Plan and overall housing strategy, reflecting on each matter with regard to the ‘tests of soundness’, to ensure compliance with the requirements of the Planning and Compulsory Purchase Act 2004 and Planning Policy Wales 11 (PPW 11) (February 2021).

Soundness

The fundamental requirement for a Local Development Plan to be sound is prescribed in the Planning and Compulsory Purchase Act 2004. With regard to the ‘tests of soundness’, whilst there is no statutory definition of ‘soundness’ the Development Plans Manual (Edition 3) (March 2020) advises that the following criteria should be considered:

Test 1. Does the plan fit?

Test 2. Is the Plan appropriate?



Test 3. Will the Plan deliver?

Policies and comments

Persimmon Homes West Wales raise concern regarding the Plan Period, noting that if adopted in 2024 as targeted, the Plan will effectively only cover a relatively short Plan Period Post Adoption of 10 years. It is considered a more proactive approach would be to Plan for a 15 year period from the point of adoption to allow for greater certainty over the longer-term (particularly if a future LDP is likely to suffer from such delays and to align the Plan with Future Wales: the National Plan (2040). Such an approach would call for the allocation of additional sites to meet the housing need for the extended Plan Period.

The Deposit Plan as currently drafted fails Test 1 and 3 in terms of the current Plan Period, with regard to the effectiveness of the Plan Period and the need to fit with other plans and policies. We consider a 15 year plan period from the anticipated point of adoption should be implemented and additional residential site allocations which are available and deliverable should be allocated to meet housing need (Church Road, Gorslas and Land at Forest).

SP3: Sustainable Distribution – Settlement Framework

SP3 directs the provision of growth and development to sustainable locations. This takes a 4 tiered approach in terms of the settlement framework. These include the principal centres, the service centres, sustainable villages and rural villages. The principal centres remain as Carmarthen, Llanelli and Ammanford/Cross Hands, which includes Gorslas, where the majority of development will be directed. Fforest/Hendy is defined as a Service Centre in Cluster 2 where 15-20% of development will be directed. We support the provision of Housing Allocations in Principal Centres and Service Centres

As part of the review process, Persimmon Homes are promoting the inclusion of sites SR/069/003 (Option 1 and 2) in Fforest and SR/067/002 in Gorslas in the Deposit Plan.

It is considered that the future development of the residential sites at both Gorslas and Fforest (option 1 and 2) which have been submitted as Candidate Sites would be coherent and consistent with the Local Development Plan vision, objectives, preferred strategy and Deposit Plan Policies.

SP4: A Sustainable Approach to Providing New Homes

This Deposit Plan proposes to use the ten-year based projection from Turley's Housing and Economic Growth Report and utilise the Council Tax vacancy rate of 3.8% to underpin the future growth requirements for this revised Deposit LDP. This results in the following for the plan period:

- Projected population change between 2018-2033: +14,468
- New homes requirement: + 588 per year
- New Homes requirement during the plan period: 8,822
- Jobs creation value per annum: +276

This will result in 13 units less over the plan period from the original Deposit Plan which was consulted upon.





This Deposit Plan's strategic policy (SP1) outlines the LDP will provide for the future growth of a sustainable economy and housing requirement through the provision of:

- 9,704 new homes to meet the identified housing requirement of 8,822 with a 10% flexibility allowance.
- The focus on regeneration and growth reflects the Council's core strategic ambitions with development distributed in a sustainable manner consistent with the spatial strategy and settlement framework.

This will result in 456 less new homes in the plan period from the original Deposit Plan which was consulted upon. A more ambitious housing requirement would facilitate the economic growth required in the county and will be more effective in achieving the Council's vision and objectives. Persimmon Homes considers that the plan lacks ambition in regards to the housing numbers.

The removal of the 5 year housing land supply policy within PPW 11 and TAN 1 and the replacement with the housing trajectory approach to monitor the delivery of LDP housing requirements, places even greater importance on ensuring that the housing trajectory is credible and realistic and it is critical that the housing allocations proposed in emerging Local Development Plans are appropriately and robustly evidenced to ensure that they are realistically deliverable.

Planning Policy Wales Edition 11 sets out the land use planning policies of the Welsh Government with its primary objective being to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

PPW 11 states that the *'planning system 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'.*

'The supply of land to meet the housing requirement proposed in a development plan must be deliverable. To achieve this, development plans must include a supply of land which delivers the identified housing requirement figure and makes a locally appropriate additional flexibility allowance for sites not coming forward during the plan period. The ability to deliver requirements must be demonstrated through a housing trajectory. The trajectory should be prepared as part of the development plan process and form part of the plan. The trajectory will illustrate the expected rate of housing delivery for both market and affordable housing for the plan period. To be 'deliverable', sites must be 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'.

'As part of demonstrating the deliverability of housing sites, financial viability must be assessed prior to their inclusion as allocations in a development plan. At the 'Candidate Site' stage of development plan preparation land owners/developers must carry out an initial site viability assessment and provide evidence to demonstrate the financial deliverability of their sites. At the 'Deposit' stage, there must be a high level plan-wide viability appraisal undertaken to give certainty that the development plan and its





policies can be delivered in principle, taking into account affordable housing targets, infrastructure and other policy requirements'.

Flexibility Allowance

The flexibility allowance in terms of housing numbers is to be included in a Plan to ensure it will remain effective in the event of changing circumstance such as non-delivery of key sites and / or other unforeseen issues. The Development Plan Manual indicates that a 10% flexibility allowance should be the starting point in terms of housing provision. Persimmon Homes West Wales are of the view that the appropriate rate should be set based on local circumstances. We consider that a greater level of flexibility should be allowed for in the Plan to increase the change of meeting the housing needs of the County. Such a flexibility allowance will assist in overcoming uncertainties regarding housing deliverability and viability and would also allow additional flexibility given the shorter time period on which the Plan is proposed (10 years from adoption). The provision of 15% flexibility would increase the housing supply to 10,145 and increase the allocated plots by 441 dwellings.

Site Allocations

Persimmon Homes supports the allocation of the Strategic Site at Carmarthen West and would like to provide confirmation that as one of the largest house builders in West Wales, we are currently going through the Planning Application and Design process for 343 dwellings on Carmarthen West and are also actively working to obtain an Option Agreement for an additional 300 units. The site is considered deliverable and viable and we therefore support the inclusion of the site in the Plan under reference PrC1/MU1.

Persimmon Homes supports the allocation of Dafen East Gateway for the delivery of housing under reference PrC2/h23. We are currently within the Planning Process for the development scheme and intend to begin construction on site as soon as we are able. We are confident that the development site will be delivered in line with the Housing Trajectory as set out in the Deposit Plan. In regards to this allocation, the site is currently 20% affordable housing with the planning application complying with this policy level, we therefore request that the affordable housing requirement is reduced from 30% (which does not fall in line with AHOM1 at 25%) to the current level of 20%.

AHOM1: Affordable Housing

Persimmon Homes West Wales Object to the nature of the Affordable Housing Provision Policy AHOM1. The changes to the Affordable Housing percentages at a blanket of 25% on sites which are over 101 plots does not consider the changes in viability and locality of a site across the County Council area.

If you require any further information on the above or would like to discuss any points, please do not hesitate to contact me.

Kind regards,

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Strategic Planning Manager
Persimmon Homes West Wales

