

Our Ref: EBP/HOM3

Date: 12th April 2023

Forward Planning Manager,
Place and Sustainability,
Department of Sustainability and Infrastructure,
Carmarthenshire County Council
3 Spilman Street,
Carmarthen
SA31 1LE

Dear Sir/Madam,

**Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft
Objection to Policy HOM3 on behalf of Evans Banks Planning Ltd**

Further to the publication of the above document, we have been asked by our Clients to review its contents, policies and proposals and advise them of any aspects we believe would unreasonably affect their aspirations and interests. In doing so we consider it necessary to make a formal representation to the “soundness” of the Carmarthenshire Deposit Local Development Plan, including in relation to the provisions of part of *Policy HOM3 (Homes in Rural Villages)*. As a result, we offer the following for the Council’s consideration, and Inspector’s in due course.

It is clear that Policy HOM3 seeks to rectify the deficiency of previous Development Plans and their policies when it comes to addressing the housing needs and requirements of all members of a rural community, in addition to those in direct social housing need. In order to sustain, preserve or recover a community’s level of sustainability, it is vital that provision for new housing is made available for all its members, irrespective of their social or economic backgrounds. This ensures a positive balance within such communities that will secure their sustainability for the future, as under-provision of new housing in such settlements has been a key factor in the decline and removal of many key community facilities (e.g. schools) within them during previous Plan periods. It is considered that Policy HOM3, by in large therefore, now makes a significant move towards ensuring that local planning policy in Carmarthenshire goes some way to assist in securing this objective.

Notwithstanding the above, such rural communities and the settlements they relate to or revolve around are somewhat smaller than established satellite villages and their associated larger towns. Growth is therefore needed, but in a controlled manner to preserve environmental aspects of a geographic area. Again, we welcome Policy HOM3 criteria related aspects that allow, but at the same time control, growth of the related Rural Villages. We also welcome that such growth should be limited to take place in the following circumstances:

- Minor infill or a small gap between the existing built form; or
- Logical extensions and/or rounding off of the development pattern that fits in with the character of the village form and landscape; or
- Conversion or the sub-division of large dwellings.

Notwithstanding the above, we have concerns and would object to the proposed 'cap' on new open market housing development. Under the provisions of the 2nd Deposit LDP the cap on new housing development within the Plan period must not exceed " ...10% over and above the number of existing homes, as of the base date of the Plan in the settlement will be allowed.". However, in the 1st Deposit LDP this figure was 20%, although no explanation of evidence has been provided by the Council as to why this figure should be halved? This lack of justification or clarity on the decision in itself causes the Plan to be deemed 'unsound'.

Firstly, we would strongly argue that in order to ensure those communities identified as Rural Villages in the Plan can become truly sustainable and recover from years of policy neglect, this cap should be returned to 20%. 10% is far too restrictive and will go nowhere near to meeting the pent-up demand in rural communities for new housing.

Secondly, the 10% cap and limitation to 'existing homes' (and so not taking into account recent consents) is so overly restrictive and prescriptive that it will lead to potentially bad, illogical and unnatural placemaking. For example a village of 40 homes with natural infill opportunities for 6 units over 2 equally sized sites, would only be able to deliver 3 units, as the part development of the second could result in an illogical form of development that does not compliment an existing settlement pattern or meet other policy requirements in the Plan. The construction of all 6 would do so, but under the current 10% cap would be prevented from doing so.

The settlement patterns of Carmarthenshire's Rural Villages are extremely varied and each has numerous opportunities for small scale new housing that follow the three locational criteria of Policy HOM3, which they have been prevented from doing so historically due to continual restrictive and illogical 'development limits' style policies of successive plans. However, even with the more pragmatic approach being proposed by Policy HOM3, such rural communities will continue to be failed and prevented from declining further if the 10% cap is retained.

In summary, we full support the principles put forward by Policy HOM3 and its overall approach to supporting rural communities in the identified Rural Villages. However, we object to the proposed 10% cap put forward by the 2nd Deposit LDP, as without clear evidence for halving the figure put forward in the 1st Deposit LDP, we are unable to see how the objective of Policy HOM3 can be achieved. This in turn puts the soundness of the Plan into question. In addition, in order to provide clarity and a true positive impact on rural communities in Carmarthenshire, we propose that the relevant wording of the Policy should be amended to read as follows:

"...20% over and above the number of existing homes and those under construction, as of the adoption date of the Plan in the settlement will be allowed.

We therefore respectfully request that this Representation be given careful examination, and that the cap figure and associated wording included within Policy HOM3 be revisited to ensure that the document passes all the relevant tests of soundness.

Kind regards



Jason D Evans
Director