

Our Ref.: EBP/SP1

Date: 12<sup>th</sup> 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 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 *Strategic Policy SP1 (Strategic Growth)*. As a result, we offer the following for the Authority’s consideration, and Inspector’s in due course.

Policy SP1 represents the Council’s strategic position with regard to the County’s growth during the Plan period. It sets out that within the Plan period (2018-2033) the document is expected to deliver “9,704 new homes to meet the identified housing requirement of 8,822.” through a range of housing supply components. The ‘new homes’ figure has been reached through research undertaken by and on behalf of the Council, advising that it has taken into account a range of factors and data sets in reaching that figure. However, through our own

examination and consideration, we have identified that certain factors have not been given full or any consideration during that process, which are summarised as follows.

Like most counties in Wales, Carmarthenshire has seen not one, but two of its previous development plans fail in terms of delivering sufficient housing to meet the level of housing need the very same plans have identified. In the associated Topic Papers published by the Council, it is admitted that whilst the current adopted Carmarthenshire Local Development Plan (LDP) was expected to deliver on average 1,103 dwellings per annum, it in fact delivered less than half (501 dwellings per annum), with the previous Unitary Development Plan showing a similar trend.

Since the adoption of the current LDP in December 2014, the housing market in Carmarthenshire has seen steady growth in terms of demand, for both new and existing units. However, with supply levels of new housing being far lower than the adopted Plan identified as being needed (by some 7,500+ units), this has had a significant impact on the County's demographics.

What increase in housing stock there has been, has indeed provided a growth in population since 2011, but only of 2.2%. However, 18.9% of the County's population is now aged 65 years and over. In contrast, the number of people aged 15 to 64 in the County has decreased by 2.5% and those aged 15 years and under has decreased 0.8%. In addition, according to the submitted Topic Papers, the average household size is expected to have now risen to a figure of 2.30, whereas previous projections had thought it would only be 2.05.

The above therefore clearly illustrates the ongoing impact of the failure of previous Plans to deliver sufficient housing to meet the needs of its native population, as well as those wishing to move to the County to assist with the Council achieving its strategic economic objectives. As a result, it is not considered that the current housing figure being put forward by the Deposit LDP is sufficient to compensate for the historic under provision and prevent the current worrying and unsustainable demographic trends from being reversed.

We therefore respectfully request that this Representation be given careful examination, and that the housing need figure be revisited to ensure that the document passes all the relevant tests of soundness.

Yours sincerely,

A solid black rectangular box used to redact the signature of Jason D Evans.

**Jason D Evans**

**Director**

Enc.