

Our Ref.: EBP/SP4

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 on 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 SP4 (A Sustainable Approach to Providing New Homes)*. As a result, we offer the following for the Authority’s consideration, and Inspector’s in due course.

Policy SP4 represents the Council’s strategic position with regard to the County’s provision of new homes 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, which are as follows:

- Housing Allocations (5+ homes)
 - Land bank Commitments
 - Completed Dwellings
- Windfall Allowance
 - Small Site Component (less than 5 homes)
 - Windfall Component (5+ Homes)
- Flexibility (+10%)

However, through our own examination and consideration, we have identified that two of the above components give rise for concern and in turn put into question the ability of the Plan to deliver the proposed 'new homes' figure cited above. These concerns are summarised as follows.

Housing Allocations (5+ homes)

Having reviewed all proposed housing allocations put forward by the Plan under the provisions of Policy HOM1, we have identified a significant number that are clearly in themselves undeliverable and these are in turn subject of separate individual submissions. Notwithstanding this, the sheer number of such sites is on its own a reason to question the 'soundness' of the Plan.

In addition to the above, we have concerns with regards to (a) how the number of units assigned to each allocation has been derived and (b) the ability of allocations in certain geographic areas of the County being capable of reaching those targets.

In its explanatory text of Policy SP4 at Paragraph 11.85, the Council advises that "*Site numbers highlighted within the Policy HOM1 are intended to be indicative and been considered on a site by site basis. They will be subject to further consideration at application stage. Regard will also be had to the policies and provisions of this plan and other relevant design principles.*". Whilst it is recognised that such assigned figures are indeed often indicative to provide flexibility, there appears to be no clearly defined consistent process of assessment or assignment of such unit figures to individual sites. In the absence of this evidence and a clear account of how these unit figures have been reached, there is a question over the 'soundness' of the Plan in terms of the ability of the proposed housing allocations meeting the aforementioned 'new homes' target figure.

In addition to the above, we have concerns with regards to the assigned unit numbers for allocations within the river catchments of the Teifi and Tywi Special Area of Conservation (SAC). The challenges presented to all elements of the planning process as a result of the new regulations published by Natural Resources Wales (NRW) with regards to phosphates generated by proposed developments, particularly housing.

Through our own experience, solutions for overcoming the challenges raised by the aforementioned regulations have now been identified, in both sewered and non-sewered areas. However, in each case, there is a 'land-take' requirement, which has in turn significant implications for any proposed housing allocations within the two aforementioned SACs.

In a recent case this practice has been involved with at Cwmman (see accompanying layout), a site capable of physically accommodating 22 units is now only being proposed for 13, due to the on-site apparatus required to provide a satisfactory level of phosphate treatment. Having examined those allocations being proposed in the two aforementioned SAC, it is clear that this potential 33%+ reduction in unit numbers has not been taken into account in assigning unit numbers as part of their inclusion in Policy HOM1. On this basis, again, there is significant doubt that these allocations will be capable of delivering anywhere near the number of new homes the Council expects. This in turn therefore questions the 'soundness' of one of the Plan's strategic policies and in turn the Plan itself.

The above therefore clearly illustrates that there is significant concerns that the new homes figure quoted by Policy SP4 and the framework that supports its provision is undeliverable. As a result and on this basis, the 2nd Deposit LDP fails the required Tests of Soundness and consequently the Plan is 'unsound'.

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,



Jason D Evans

Director

Enc.