

## HEARING SESSION 2: PROSPEROUS PEOPLE AND PLACES – HOUSING AND COMMUNITY INFRASTRUCTURE

Wednesday 16<sup>th</sup> October (10.00 – 17.00) (Virtual Hearing)

**Matter 2: Prosperous People and Places – Housing and Community Infrastructure**

Prepared on behalf of Barratt David Wilson Homes, South Wales

Rep ID: 4879

1. Boyer is instructed by our client, Barratt David Wilson Homes, South Wales ('BDW'), to submit a Matter Statement in respect of Matter 2: Prosperous People and Places – Housing and Community Infrastructure.
2. This Matter Statement should be read in conjunction with previous responses prepared by Boyer and BDW:
  - Deposit Revised LDP (BDW)
  - 2nd Deposit Revised LDP (Boyer)
  - Integrated Sustainability Appraisal and Habitats Regulations Assessment for the 2nd Deposit Revised LDP (Boyer)

**Issue - Is the provision and distribution of housing soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?**

### Housing Provision

**Q1. Is the housing requirement figure identified in Policy SP4 appropriate?**

**a) How has the requirement figure of 8,822 been derived? And is it based on robust and credible evidence?**

3. The supply figure of 8,822 new homes over the revised LDP period, equates to 588 new homes per year and is derived from projections of demographic trends base on a range of unconstrained scenarios over an extended 10 year period from 2020.
4. A 10% flexibility allowance has been applied to the housing supply, totally 9,704 dwellings in order to deliver the 8,822 homes.
5. The Housing and Economic Growth Report used to inform the housing requirement for the County solely considers the 'unconstrained need' for housing within the RLDP and therefore does not account for other 'supply factors' such as availability of land, environmental impact, and viability. Furthermore, this figure is based on a 10 year period up to 2030, not accounting for the additional 3 years proposed in the plan period. In addition to this, BDW consider the plan period to be extended to 2036 to account for the delays incurred by NRW and the Covid-

19 pandemic. Therefore, the 15 year trend figure from 2020 would be more credible to base the proposed housing requirement for the County. This would see an uplift to 618dpa, totalling 9,270 new homes over the plan period (plus and increased flexibility allowance).

6. Whilst the proposed housing requirement is considered “ambitious but deliverable” by Carmarthenshire, BDW disagree where the proposed requirement would fail to meet the historic undersupply within the County as documented in the Completions data within the Annual Monitoring Report (AMR) (2022-2023). The proposed figure represents the lower projection of homes needed without adjustment which fails to consider a targeted adjustment for younger people and hidden households, as suggested in the report by Edge Analytics.
7. In this regard, it is important to highlight that BDW are a national housebuilder capable of providing a wide range of tenures and mix to support Carmarthenshire, as well as a number of offers to facilitate the homes for all, which are not necessarily available from smaller developers or on the smaller sites, especially in terms of first-time buyer schemes. BDW have the ability to support part ex, first time buyers and help to buy, as well as a number of other offers providing a range and choice.

**b) In identifying the requirement figure, has adequate regard been paid to the most recent Welsh Government household and population projections?**

8. A full update to national population projections is due to be released in October/November 2024 and will include data from Census 2021 for Wales. However, the current national projections based on 2021 data are higher than previous projections from 2020-based data and considerable higher than 2018-based projections. Between mid-2021 and mid-2031, the population of Wales is projected to increase by 5.8% from 3.11 million to 3.29 million. Given the population growth, linked with the need to support the Future Wales and in particular the Swansea Bay & Llanelli National Growth Area and Swansea Bay City Region, then further consideration is needed since the last census.

**c) Have alternative housing growth scenarios been considered? If so, why have they been discounted, and why has the preferred option been chosen?**

9. 10-year and 15-year trend projections have been considered alongside a baseline employment-led scenario focused on economic growth. The lower figure in the 10-year trend projection has been taken forward without proposed adjustments to account for historic undersupply of homes.
10. The 10-year trend is considered to allow for flexibility to drive sustainable housing growth and contribute to supporting the economic ambitions of Carmarthenshire. Whilst the 15-year trend extends this trend period, this scenario would provide a more positive outlook for housing growth and job creation. Whilst Carmarthenshire consider this scenario to provide slightly in excess of the Plan’s housing growth potential, BDW consider this scenario to be more representative of the need of the County, given the time delays experienced through the plan

making process and request for the plan period to be extended. The projection should therefore be revised to reflect the 15 years.

11. The employment led scenario would see an uplift of 74dpa, however Carmarthenshire consider this to be an undeliverable and unsustainable growth strategy.

**d) Has the requirement figure been informed by a robust assessment of the main local influences on housing demand in Carmarthenshire including, household formation size, migration levels, and vacancy rates?**

12. Authority to answer.

**2. Is the housing land supply figure identified in Policy SP4 appropriate?**

**a) How has the supply figure of 9,704 been derived? And is it based on robust and credible evidence?**

13. Authority to answer.

**b) What is the make-up of the housing supply? should this be outlined in the reasoned justification of Policy SP4 and, where appropriate, do all the components have the same base date?**

14. BDW question paragraph 11.85 which outlines 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. The lack of certainty on the actual numbers for the housing supply is therefore questioned. Given the significant number of allocations, then a small variation in each could lead to a cumulative deficit across the housing supply.

**c) Is the estimated yield of units from committed and windfall sites realistic and based on robust evidence? And has a non-delivery allowance been defined and applied?**

15. BDW note that of the 4,342 dwellings as part of the committed sites at all Clusters/Tiers as identified in Appendix 7, 847 dwellings (approx. 20%) are in outline and require Reserved Matters approval prior to commencement.

16. Of the 847 dwellings, 513 (60%) are within Cluster 2, highlighting the need for greater flexibility to account of the non-delivery of those larger committed sites.

17. This is particularly relevant for proposed Allocation PrC2/h22 - Cwm y Nant, Dafen for 202 dwellings, which according to the trajectory is to provide 40 dwellings in 25/26 and thereafter until 29/30. Whilst Outline Planning Permission was granted July 2021 an application to vary condition 1 to allow a further 5 years for the submission of reserved matters was validated in August 2024. There is clear uncertainty on delivery and pushing further back in the trajectory.

18. BDW note that windfalls by their very nature are ad hoc and difficult to plan for. The previous Annual Monitoring Report (AMR) (2022-2023) indicates that the number of windfall dwellings permitted has shown a general decrease since the adoption of the current LDP.

19. In this context BDW recommend addressing the uncertainty in delivery by increasing the flexibility allowance and allocating the BDW 160 dwelling Candidate Site (SR/086/053), Land off Heol-y-Mynydd, to allow early delivery post adoption.

**d) How many dwellings will be built in Tier 4 settlements? And is this analysis based on robust and credible evidence?**

20. This is for the Authority to answer, however BDW note that they recognise there will be limited opportunities and given the nature of the Tier 4 settlements this would not make a significant contribution.

**e) Should details of the housing allocations and committed housing sites be included in the Plan?**

21. BDW consider that details of the housing allocations and committed sites should be included in the Plan. For the Plan to be sound there is a requirement to unequivocally evidence delivery of sites. Without the full details of the sites then it is difficult to full asses.

**f) How has the flexibility allowance of 10% been defined? And is it based on robust and credible evidence?**

22. The current figures presented are underpinned by a 10% flexible allowance in relation to housing delivery. However, it's important to take account of recent guidance provided to other Local Planning Authorities in Wales which have adopted their Local Development Plan. For example, in Swansea the Inspector concluded that due to changes to the housing figures arising during the examination, the flexible allowance needed to be recalculated and ultimately quantified at 2,045 dwellings or 13.1%. This percentage was derived partly due to increased lead-in times for the delivery of units on large strategic sites, thereby resulting in a need to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere.

23. More recently in the recently adopted Bridgend Local Development Plan, there was a need to incorporate a greater flexibility allowance of 14% equating to an additional 1,053 dwellings. This provision was required to demonstrate delivery of the Anticipated Annual Build Rate (AABR) and seeks to ensure that the Plan remained effective in the event of changing circumstances such as non-delivery of key sites. As part of this process the Inspector advised that an increase beyond the standard 10% would therefore be required to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

24. Applying these principles to Carmarthenshire it is evident that a flexible housing allowance above the current 10% threshold will be required. Whilst there are limited larger scale strategic sites, the trajectory indicates that these will be delivered towards the end of the plan period, though this has already become compressed due to the significant delays due to Phosphates and their delivery is questioned. Furthermore, there is a heavy reliance on small scale developments to deliver immediately post adoption. BDW consider that there are more difficult delivery and financial obstacles for the smaller sites which has overestimated their combined delivery.
25. BDW also note that as addressed in Hearing Session 1 Q 11(b), the Authority consider the Reserve Sites allow the additional flexibility to cover any non-delivering allocations. BDW's concerns are that by their very nature they are difficult sites, otherwise they would have been allocated. The reliance on the Reserved Sites is not appropriate and additional flexibility should be provided to deliver the Plan.
26. Having reviewed the Council's evidence base we believe a minimum allowance of 15% would be reflective of the Authorities growth aspirations requirements against the Future Wales: The National Plan 2040 and in particular the Swansea Bay & Llanelli National Growth Area and Swansea Bay City Region. This would result in an additional 1,300 dwellings rather than the 882 proposed, with a total requirement of 10,145 dwellings.
27. This is further compounded by the fact the Council's latest Annual Monitoring Report (AMR) (2022-2023) demonstrates that historically there has been an under provision in terms of housing delivery across the Authority. Looking at the figures, dwelling completions have fallen consistently below the 1000 dwelling Average Annual Requirement (AAR). In previous AMRs, the five year supply has not been met and reasons have been given for this and remain relevant to the dwelling completions falling significantly below the AAR.

**3. Is the rate of delivery contained in the housing trajectory realistic, based on robust and credible evidence and consistent with the requirements of the Manual?**

28. Further details on specific sites and their delivery in the trajectory are provided in Hearing Session 8: Prosperous People and Places – Site Allocations (Cluster 2 – Llanelli) Statement.
29. In general, BDW raise concerns in regard to the significant number of small sites proposed and the impact this has on the trajectory. Whilst it is understood that there is a requirement for some smaller sites due to the nature of the settlements and more rural approach in Carmarthenshire, the significant cumulative delivery of these sites within the Plan period is questioned.
30. The delivery of smaller sites are generally more susceptible to financial/viability challenges as well as ever increasing labour and material costs. BDW are a national house builder with extensive experience and are able to deliver sites, such as the 160 dwelling Candidate Site (SR/086/053), Land off Heol-y-Mynydd, in the early trajectory post adoption.

31. BDW also raise the concern regarding the Phosphates issue and in particular the number of housing allocations located within Phosphate Sensitive Catchment Areas. As outlined in representations to the Consultation on the Integrated Sustainability Appraisal and Habitats Regulations Assessment (April 2024), BDW consider the fact that the proposed approaches do not go to the heart of the Phosphates issue, rather push the issues further along the process has the potential to cause significant delays in the delivery of sites, impacting upon the trajectory.
32. As for the larger site allocations, BDW highlight that some of these are already commitments and on site, though the majority have been placed in the latter years of the trajectory. BDW note that due to the significant delays in the Plan to date, and not extending the Plan period to compensate, has resulted in the delivery timeframe becoming compressed and question the delivery of these larger sites within the plan period.
33. This is particularly relevant for proposed Allocation PrC2/h22 - Cwm y Nant, Dafen for 202 dwellings, as outlined in Q 2(c ) and proposed Allocation PrC2/h23 - Dafen East Gateway for 150 dwellings which was recently refused (Refer to Hearing Session 8: Prosperous People and Places – Site Allocations (Cluster 2 – Llanelli) Statement.

#### **4. Will the Plan deliver the housing requirement?**

##### **a) Are the site allocations available and deliverable within the anticipated timescales? Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?**

34. Please refer to Q 3 above and Hearing Session 8: Prosperous People and Places – Site Allocations (Cluster 2 – Llanelli) Statement.
35. In summary BDW raise a number of concerns regarding the delivery of proposed allocations. These concerns include:
- The reliance on a significant number of small site allocations and their ability to be delivered cumulatively.
  - The lack of delivery of larger sites, particularly within the Llanelli Cluster as identified above in Q 3. Proposed Allocation PrC2/h23 has recently been refused and according to the trajectory is meant to provide completions 23/24. Furthermore, proposed Allocation PrC2/h22 has currently submitted a variation of condition to extend the commencement of development by a further 5 years, clearly no intention to deliver 40 dwellings in 25/26. BDW question the reliability of the trajectory.
  - The Council should reconsider their spatial distribution of housing allocations to include additional allocations outside of Phosphate areas.
  - The proposed Phosphate mitigation does not go to the heart of the Phosphates issue, rather push the issues further along the planning process. The fact that over 400 proposed allocated dwellings are within the Phosphate Sensitive Catchment Areas,

and would be subject to required mitigation through applications, has a significant impact on delivery and further stretches planning resource. In combination, Phosphates and lack of resources has the potential to cause significant delays in the delivery of sites, impacting upon the trajectory.

- Alternative sites, outside of the Phosphate Sensitive Catchment Areas, should be allocated, including Candidate Site (SR/086/053), Land off Heol-y-Mynydd.
- There is concern regarding the impacts of the lack of Headroom in the Permits for Waste Water Treatment Works, however BDW do suggest that allocating further development, in particular in Llanelli, will assist in earlier work being funded and undertaken.

#### **b) Should committed sites be allocated?**

36. BDW consider that Committed sites should not be allocated, rather there should be an increase in the flexibility allowance to address such circumstances.

#### **c) Is the Plan's housing strategy sufficiently flexible to respond to changing circumstances?**

37. As outlined in response to Q 2(f), BDW consider that with a minimum 10% flexibility allowance then any change in circumstance or delay in the Allocations would have detrimental impacts. It is therefore BDW's suggestion that the flexibility allowance should be no less than 15%. This addresses the over reliance on a number of small sites as well as a lack of national house builders to provide certainty and continuity.

38. BDW also note that as addressed in Hearing Session 1 - Q 11(b), the Authority consider the Reserve Sites allow the additional flexibility to cover any non-delivering allocations. BDW are concerned that by their very nature, they are difficult sites, otherwise they would have been allocated. The reliance on the Reserved Sites is not appropriate and additional flexibility should be provided to deliver the Plan.

39. BDW consider that the appropriate remedy would be the increase in the flexibility allowance and the Allocation of Candidate Site (SR/086/053), Land off Heol-y-Mynydd as a site which is developer led and could deliver housing in the early stages after Adoption.

### **Housing Distribution and Development**

#### **5. Is the spatial distribution of new housing development sustainable and coherent?**

40. In principle BDW support the Strategic Policy – SP3: Sustainable Distribution – Settlement Framework and identifying Tiers and Clusters.

41. However, BDW recommend that the Authority should reconsider their spatial distribution of housing allocations to include additional allocations outside of the Phosphate Sensitive Catchment Areas. In this regard, BDW again highlight that their Candidate Site (SR/086/053), Land off Heol-y-Mynydd, Bryn is deliverable and developer lead and would be within Tier 1, Cluster 2 and provide an early delivery of up to 160 dwellings.

**a) How will new windfall development within each tier of the settlement hierarchy be assessed and managed? Should the reasoned justification of Policy HOM2 be expanded to explain the approach to assessing proposals in accordance with the Plan?**

42. BDW note that Policy HOM2 outlines that housing developments on unallocated sites within the development limits of a defined settlement in Tiers 1, 2 and 3 will be permitted as windfall sites. However, BDW note that windfalls by their very nature are ad hoc and difficult to manage as evidenced within the previous Annual Monitoring Report (AMR) (2022-2023) which indicates that the number of windfall dwellings permitted has shown a general decrease since the adopting of the current LDP.
43. Despite the current decreasing trend, BDW are concerned that there is no clear guidance on the acceptability of windfall sites, other than they need to be within the development limits and 'reflect the character of the area and be compatible with the provisions of the Plan' which is too ambiguous and allow development which are not held to the same policy control as allocated sites.

**b) Is the spatial distribution of housing allocations and windfall opportunities consistent with the identified settlement hierarchy? And are the tables contained in Appendix 7 accurate?**

44. Whilst this is for the Authority to address, BDW support a higher proportion of development in the Tier 1 settlements of Clusters.
45. However, as outlined in Q3, Q4(a) and Q5(a) BDW raise the concern regarding the Phosphates issue and in particular the number of housing allocations located within Phosphate Sensitive Catchment Areas and the potential to cause significant delays in the delivery of sites, impacting upon the trajectory.
46. BDW recommend that the Authority should reconsider their spatial distribution of housing allocations to include additional allocations outside of the Phosphate Sensitive Catchment Areas. In this regard, BDW again highlight that their Candidate Site (SR/086/053), Land off Heol-y-Mynydd, Bryn is deliverable and developer lead and would be within Tier 1, Cluster 2 and provide an early delivery of up to 160 dwellings.

**8. Should the Plan include a policy which seeks to manage density levels on all sites proposed for residential development?**

47. Future Wales - The National Plan 2040, under Strategic Placemaking Principles (Page 66) does state that '*New developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations*'.
48. The density requirement needs to be reflected in the Plan and to accord with National Policy. If this has not been considered, then BDW questions the actual deliverability of historic commitments and allocated sites. Without this full assessment the actual deliverability and trajectory of the Tier 1 & 2 settlement sites is questioned.



49. Furthermore, smaller PDL urban sites, including those windfall sites, are often more constrained and the need for larger green field releases on settlement edges to deliver the trajectory is needed.