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Revised 2018-2033
Local Development Plan

Integrated Sustainability Appraisal (ISA) Appendices (E-I)

2nd Deposit Plan
February 2023

Cyngor **Sir Gâr**
Carmarthenshire
County Council

Contents

Appendix E

ISA Growth Options

Appendix E: ISA Growth Options

The table below contains the assessment criteria for draft policies and reasonable alternatives, as adapted from Welsh Government Development Plans Manual Edition 3 (2020).

Symbol	Predicted Effect (Compared to the current situation)	Suggestions for Policy Response
++	Very positive effect – likely to result in substantial progress towards the ISA objective.	Consider whether very positive effect can be further enhanced through policies
+	Positive effect - likely to result in some progress towards the ISA objective.	Consider whether positive effect can be further enhanced through policies
+/-	Positive and negative effects – the subject of the appraisal would help some elements of the ISA objective whilst hindering others.	Policies should look to mitigate negative effects and enhance those positive effects
-	Negative effect – likely to be somewhat detrimental to achieving the ISA objective.	Mitigation measures will be needed to reduce severity or effect of growth option.
--	Very negative effect – likely to be substantially detrimental to achieving the ISA objective.	Significant mitigation measures will be needed to reduce severity or effect of growth option.
0	Neutral effect compared to the current baseline situation	Consider whether policy interventions could bring positive effects
?	Uncertain effect (more information needed)	Consider where this will come from – who has it? What will be done about collecting it? When will it be collected?

1st Deposit LDP Preferred Growth Option

PG 10 Year (2019 Addendum Report)

Internal migration rates and international migration flow assumptions are based on a ten-year historical period, ignoring the anomalous years around the immediate aftermath of the financial crash.

ISA Objective	Appraisal	Comments
ISA1 – Sustainable Development	+	This option is likely to contribute positively to supporting a sustainable economy and a healthy, balanced society.
ISA2 – Biodiversity	+/-	Development of any form has the potential for negative effects on biodiversity, depending on the choice of site and the manner in which they are developed. However, this option sees a decrease in the number of dwellings required in the current plan, from 1,013 to 589 which would reduce the need for development on greenfield land and resulting pressure on biodiversity assets.
ISA3 – Air Quality	+/-	Any level of growth infers an increase in transport and economic activity which will potentially lead to increased gaseous emissions. Whilst the number of dwellings required under this option is significantly lower than the current LDP requirement and (slightly) lower than previous preferred Growth Option (PG 10 Year), this level of growth is unlikely to alleviate pressure on areas of poor air quality (AQMZs). Policies will need to mitigate potential impact upon achieving WBFGA Goals (Specifically Globally Responsible & Healthier), human health and well-being (increased traffic potentially causing secondary mental health issues), Area Statement (Cross-cutting theme: Climate Change) and upholding the Socio-Economic Duty given the unequal manner in which air quality can affect communities.
ISA4 – Climatic Factors	+/-	Any level of growth infers increasing transport and economic activity and associated greenhouse gas emissions. However, the number of dwellings required under this option is significantly lower than the current LDP requirement so may result in less carbon emissions. New development, situated

		appropriately and designed to current WG standards, are likely to be more climate resilient and energy efficient than existing housing.
ISA5 – Water	+	This growth option projects a household growth of 10.6% over the plan period, which is within the 14.6% capacity provided for in the Dŵr Cymru Welsh Water (DCWW) Resource Management Plan.
ISA6 – Material Assets	0	No direct link
ISA7 - Soil	+	Any level of development infers the loss of soil/permeable surfaces to hard standing. However, the number of dwellings required under this option is significantly lower than the current LDP requirement so will reduce the need for greenfield land.
ISA8 – Cultural Heritage and Historic Environment	+/-	Whilst the effect of this option on ISA8 will be dependent on how growth is implemented, this level of growth may have secondary effects (both positive and negative) upon resources of cultural/historic significance (e.g., renovation of listed building protecting heritage for future generations).
ISA9 – Landscape	+/-	Development of any form has the potential for negative effects upon landscape interest, depending on the choice of site and the manner in which they are developed. This proposed number of dwellings may require changes in land-use and adversely impact the landscape, however, development could also regenerate urban/rural areas and derelict land.
ISA10 – Population	++	This option will go some way to addressing the balance of the population, with a likely increase in the younger age cohorts.
ISA11 – Welsh Language	+/-	This level of growth would likely increase in the numbers of young persons and, as a proportion will be Welsh speakers, have positive effects upon the Welsh Language. This would be supported by Carmarthenshire's Welsh in Education Strategic Plan which aims to increase the provision of Welsh-medium education. Whilst these factors are proposed to provide an overall likely positive effect, additional information is needed to determine if this level of growth is likely to lead to a sustainable balance between employment opportunities, inward-mitigation, and the Welsh Language.

ISA12 – Health and Well-being	+/-	This option sees a projected increase in the 65+ age cohort, coupled with some growth in the labour workforce age groups which could result in significant challenges in the funding and delivery of health and social care services throughout the County.
ISA13 – Education and Skills	+/-	This option sees a projected increase in the population of school going ages which, depending on where growth is distributed, could increase pressure on education services in densely populated areas, or may result in the retention of school facilities in rural areas.
ISA14 – Economy	+	This option sees the creation of 354 jobs per annum over the plan period which aligns with the Council's Regeneration ambitions.
ISA15 – Social Fabric	+	This option sees growth in the 65+ age cohort coupled with some growth in the labour workforce age groups which would go some way to balancing the County's population. Higher growth levels also supports the delivery of affordable housing.

2nd Deposit rLDP Growth Options		
Principal 2018-Based WG Projection (2018) 4,359 dwellings		
ISA Objective	**Appraisal**	**Comments**
ISA1 – Sustainable Development	+	This option is likely to contribute positively to supporting a sustainable economy and a healthy, balanced society.
ISA2 – Biodiversity	+/-	Development of any form has the potential for negative effects upon biodiversity, depending on the choice of site and the manner in which they are developed. However, this option sees a decrease in the number of dwellings required in the current plan and previous preferred Growth Option (PG 10 Year) which would reduce the need for development on greenfield land and resulting pressure on biodiversity assets. Development at this scale could provide opportunities to create new habitats or/and enhance wildlife resources (including section 7 priority Habitats and Species) through mitigate/compensating policies.
ISA3 – Air Quality	+/-	Any level of growth infers increasing transport and economic activity which have the potential to increase gaseous emissions. However, the number of dwellings required under this option is significantly lower than the current LDP requirement and previous preferred Growth Option (PG 10 Year), so may alleviate some pressure on areas of poor air quality. Additionally, growth at this level could reduce the need to travel through appropriate siting.
ISA4 – Climatic Factors	+/-	Any level of growth infers increasing transport and economic activity and associated greenhouse gas emissions. However, the number of dwellings required under this option is significantly lower than the current LDP requirement so may result in less carbon emissions. New development, situated appropriately and designed to current WG standards, are likely to be more climate resilient and energy efficient than existing housing.

ISA5 – Water	+	This growth option projects a household growth within the 14.6% capacity provided for in the Dwr Cymru Welsh Water (DCWW) Resource Management Plan.
ISA6 – Material Assets	0	No direct link
ISA7 - Soil	+	Any level of development infers the loss of soil/permeable surfaces to hard standing. However, the number of dwellings required under this option is significantly lower than the current LDP requirement so will reduce the need for greenfield land.
ISA8 – Cultural Heritage and Historic Environment	+/-	Whilst the effect of this option on ISA8 will be dependent on how growth is implemented, this level of growth may have secondary effects (both positive and negative) upon resources of cultural/historic significance (e.g., renovation of listed building protecting heritage for future generations).
ISA9 – Landscape	+/-	Development of any form has the potential for negative effects upon landscape interest, depending on the choice of site and the manner in which they are developed. This proposed number of dwellings may require changes in land-use and adversely impact the landscape, however, development could also regenerate urban/rural areas and derelict land. The number of dwellings required under this option is significantly lower than the current LDP requirement and previous preferred Growth Option (PG 10 Year) which reduce the scale of impact upon the landscape.
ISA10 – Population	+	This option will go some way to addressing the balance of the population, with a likely increase in the younger age cohorts.
ISA11 – Welsh Language	+/-	This level of growth would likely increase in the numbers of young persons and, as a proportion will be Welsh speakers, have positive effects upon the Welsh Language. This would be supported by Carmarthenshire's Welsh in Education Strategic Plan which aims to increase the provision of Welsh-medium education. Whilst these factors are proposed to provide an overall likely positive effect, additional information is needed to determine if this level of growth is likely to lead to a sustainable balance between employment opportunities, inward-mitigation, and the Welsh Language.

ISA12 – Health and Well-being	+/-	This option sees a projected increase in the 65+ age cohort, coupled with some growth in the labour workforce age groups which could result in significant challenges in the funding and delivery of health and social care services throughout the County.
ISA13 – Education and Skills	+/-	This option sees a projected increase in the population of school going ages which, depending on where growth is distributed, could increase pressure on education services in densely populated areas, or may result in the retention of school facilities in rural areas.
ISA14 – Economy	+	This option sees the highest creation jobs over the plan period which aligns with the Council's Regeneration ambitions. This would support COVID-19 and economic recovery, and allow businesses to expand in line with their needed.
ISA15 – Social Fabric	+/-	This option sees growth in the 65+ age cohort coupled with some growth in the labour workforce age groups which would go some way to balancing the County's population. Higher growth levels also support the delivery of affordable housing. However, this level of growth may reduce the proportion of developments in rural areas and consequently reduce accessibility to services.

WG 2018-based "High Population" Variant (2018) 5,670 dwellings		
ISA Objective	**Appraisal**	**Comments**
ISA1 – Sustainable Development	+	This option is likely to contribute positively to supporting a sustainable economy and a healthy, balanced society.
ISA2 – Biodiversity	+/-	Development of any form has the potential for negative effects upon biodiversity, depending on the choice of site and the manner in which they are developed. However, this option sees a decrease in the number of dwellings required in the current plan and previous preferred Growth Option (PG 10 Year) which would reduce the need for development on greenfield land and resulting pressure on biodiversity assets. Development at this scale could provide opportunities to create new habitats or/and enhance wildlife resources (including section 7 priority Habitats and Species) through mitigate/compensating policies.
ISA3 – Air Quality	+/-	Any level of growth infers increasing transport and economic activity which have the potential to increase gaseous emissions. However, the number of dwellings required under this option is significantly lower than the current LDP requirement and previous preferred Growth Option (PG 10 Year), so may alleviate some pressure on areas of poor air quality. Additionally, growth at this level could reduce the need to travel through appropriate siting.
ISA4 – Climatic Factors	+/-	Any level of growth infers increasing transport and economic activity and associated greenhouse gas emissions. However, the number of dwellings required under this option is significantly lower than the current LDP requirement so may result in less carbon emissions. New development, situated appropriately and designed to current WG standards, are likely to be more climate resilient and energy efficient than existing housing.
ISA5 – Water	+	This growth option projects a household growth within the 14.6% capacity provided for in the Dwr Cymru Welsh Water (DCWW) Resource Management Plan.
ISA6 – Material Assets	0	No direct link

ISA7 - Soil	+	Any level of development infers the loss of soil/permeable surfaces to hard standing. However, the number of dwellings required under this option is significantly lower than the current LDP requirement so will reduce the need for greenfield land.
ISA8 – Cultural Heritage and Historic Environment	+/-	Whilst the effect of this option on ISA8 will be dependent on how growth is implemented, this level of growth may have secondary effects (both positive and negative) upon resources of cultural/historic significance (e.g., renovation of listed building protecting heritage for future generations).
ISA9 – Landscape	+/-	Development of any form has the potential for negative effects upon landscape interest, depending on the choice of site and the manner in which they are developed. This proposed number of dwellings may require changes in land-use and adversely impact the landscape, however, development could also regenerate urban/rural areas and derelict land. The number of dwellings required under this option is significantly lower than the current LDP requirement and previous preferred Growth Option (PG 10 Year) which reduce the scale of impact upon the landscape.
ISA10 – Population	+	This option will go some way to addressing the balance of the population, with a likely increase in the younger age cohorts.
ISA11 – Welsh Language	+/-	This level of growth would likely increase in the numbers of young persons and, as a proportion will be Welsh speakers, have positive effects upon the Welsh Language. This would be supported by Carmarthenshire's Welsh in Education Strategic Plan which aims to increase the provision of Welsh-medium education. Whilst these factors are proposed to provide an overall likely positive effect, additional information is needed to determine if this level of growth is likely to lead to a sustainable balance between employment opportunities, inward-mitigation, and the Welsh Language.
ISA12 – Health and Well-being	+/-	This option sees a projected increase in the 65+ age cohort, coupled with some growth in the labour workforce age groups which could result in significant challenges in the funding and delivery of health and social care services throughout the County.
ISA13 – Education and Skills	+/-	This option sees a projected increase in the population of school going ages which, depending on where growth is distributed, could increase pressure on education services in densely populated areas, or may result in the retention of school facilities in rural areas.

ISA14 – Economy	+	This option sees the highest creation jobs over the plan period which aligns with the Council's Regeneration ambitions. This would support COVID-19 and economic recovery, and allow businesses to expand in line with their needed.
ISA15 – Social Fabric	+/-	This option sees growth in the 65+ age cohort coupled with some growth in the labour workforce age groups which would go some way to balancing the County's population. Higher growth levels also support the delivery of affordable housing. However, this level of growth may reduce the proportion of developments in rural areas and consequently reduce accessibility to services.

Ten-Year Trend-Based Projection (2022) 8,822 dwellings		
ISA Objective	**Appraisal**	**Comments**
ISA1 – Sustainable Development	+	This option is likely to contribute positively to supporting a sustainable economy and a healthy, balanced society.
ISA2 – Biodiversity	+/-	Development of any form has the potential for negative effects upon biodiversity, depending on the choice of site and the manner in which they are developed. However, this option sees a decrease in the number of dwellings required in the current plan and previous preferred Growth Option (PG 10 Year) (albeit small) which would reduce the need for development on greenfield land and resulting pressure on biodiversity assets. Development at this scale could provide opportunities to create new habitats or/and enhance wildlife resources (including section 7 priority Habitats and Species) through mitigate/compensating policies.
ISA3 – Air Quality	-	Any level of growth infers an increase in transport and economic activity which will potentially lead to increased gaseous emissions. Whilst the number of dwellings required under this option is significantly lower than the current LDP requirement and (slightly) lower than previous preferred Growth Option (PG 10 Year), this level of growth is unlikely to alleviate pressure on areas of poor air quality (AQMZs). Policies will need to mitigate potential impact upon achieving WBFGA Goals (Specifically Globally Responsible & Healthier), human health and well-being (increased traffic potentially causing secondary mental health issues), Area Statement (Cross-cutting theme: Climate Change) and upholding the Socio-Economic Duty given the unequal manner in which air quality can affect communities.
ISA4 – Climatic Factors	+/-	Any level of growth infers increasing transport and economic activity and associated greenhouse gas emissions. However, whilst the number of dwellings required under this option is significantly lower than the current LDP requirement, any increase in energy efficient will not offset the increased emission of greenhouse gasses responsible for Climate Change. This would impact upon the same of the same components stated above. Nevertheless, new development situated appropriately and designed to current WG standards are likely to be more climate resilient.

ISA5 – Water	+	This growth option projects a household growth within the 14.6% capacity provided for in the Dwr Cymru Welsh Water (DCWW) Resource Management Plan.
ISA6 – Material Assets	0	No direct link
ISA7 - Soil	+	Any level of development infers the loss of soil/permeable surfaces to hard standing. However, the number of dwellings required under this option is significantly lower than the current LDP requirement so will reduce the need for greenfield land.
ISA8 – Cultural Heritage and Historic Environment	+/-	Whilst the effect of this option on ISA8 will be dependent on how growth is implemented, this level of growth may have secondary effects (both positive and negative) upon resources of cultural/historic significance (e.g., renovation of listed building protecting heritage for future generations).
ISA9 – Landscape	+/-	Development of any form has the potential for negative effects upon landscape interest, depending on the choice of site and the manner in which they are developed. This proposed number of dwellings may require changes in land-use and adversely impact the landscape, however, development could also regenerate urban/rural areas and derelict land. The number of dwellings required under this option is significantly lower than the current LDP requirement and slightly lower than the previous preferred Growth Option (PG 10 Year), which may reduce the scale of impact upon the landscape.
ISA10 – Population	++	This option will go some way to addressing the balance of the population, with a likely increase in the younger age cohorts.
ISA11 – Welsh Language	+/-	This level of growth would likely increase in the numbers of young persons and, as a proportion will be Welsh speakers, have positive effects upon the Welsh Language. This would be supported by Carmarthenshire's Welsh in Education Strategic Plan which aims to increase the provision of Welsh-medium education. Whilst these factors are proposed to provide an overall likely positive effect, additional information is needed to determine if this level of growth is likely to lead to a sustainable balance between employment opportunities, inward-mitigation, and the Welsh Language. Nevertheless, reference is made to the WLIA which suggests that this level of growth has the possibility of decreasing the percentage of Welsh speakers.

ISA12 – Health and Well-being	+/-	This option sees a projected increase in the 65+ age cohort, coupled with some growth in the labour workforce age groups which could result in significant challenges in the funding and delivery of health and social care services throughout the County.
ISA13 – Education and Skills	+/-	This option sees a projected increase in the population of school going ages which, depending on where growth is distributed, could increase pressure on education services in densely populated areas, or may result in the retention of school facilities in rural areas.
ISA14 – Economy	+	This option sees the highest creation jobs over the plan period which aligns with the Council's Regeneration ambitions. This would support COVID-19 and economic recovery, and allow businesses to expand in line with their needed.
ISA15 – Social Fabric	+	This option sees growth in the 65+ age cohort coupled with some growth in the labour workforce age groups which would go some way to balancing the County's population. Higher growth levels also supports the delivery of affordable housing.

Fifteen-Year Trend-Based Projection (2022) 9,272 dwellings		
ISA Objective	**Appraisal**	**Comments**
ISA1 – Sustainable Development	+/-	This option is likely to contribute positively to supporting a sustainable economy and a healthy, balanced society, however, as determined by the likely significant adverse impacts upon biodiversity and the wider environment, this level of growth may be outside of environmental limits.
ISA2 – Biodiversity	-	Development of any form has the potential for negative effects upon biodiversity, depending on the choice of site and the manner in which they are developed. However, this proposed number of dwellings would significantly increase the need for development on greenfield land and resulting pressure on biodiversity assets.
ISA3 – Air Quality	-	Any level of growth infers an increase in transport and economic activity which will potentially lead to increased gaseous emissions. Whilst the number of dwellings required under this option is significantly lower than the current LDP requirement and (slightly) lower than previous preferred Growth Option (PG 10 Year), this level of growth is unlikely to alleviate pressure on areas of poor air quality (AQMZs). Policies will need to mitigate potential impact upon achieving WBFGA Goals (Specifically Globally Responsible & Healthier), human health and well-being (increased traffic potentially causing secondary mental health issues), Area Statement (Cross-cutting theme: Climate Change) and upholding the Socio-Economic Duty given the unequal manner in which air quality can affect communities.
ISA4 – Climatic Factors	-	Any level of growth infers increasing transport and economic activity and associated greenhouse gas emissions. However, whilst the number of dwellings required under this option is significantly lower than the current LDP requirement, any increase in energy efficient will not offset the increased emission of greenhouse gasses responsible for Climate Change. This would impact upon the same of the same components stated above.
ISA5 – Water	+/-	This growth option projects a household growth within the 14.6% capacity provided for in the Dwr Cymru Welsh Water (DCWW) Resource Management Plan, although provides little headroom. Developments may lead to an increase in pollutant discharged to watercourse.

ISA6 – Material Assets	0	No direct link
ISA7 - Soil	+/-	Any level of development infers the loss of soil/permeable surfaces to hard standing. However, the number of dwellings required under this option is significantly lower than the current LDP requirement so will reduce the need for greenfield land. Nevertheless, this proposed number of dwellings would significantly increase the need for development on greenfield land/land with high ALC rating, resulting the loss of finite soil assets.
ISA8 – Cultural Heritage and Historic Environment	-	Whilst the effect of this option on ISA8 will be dependent on how growth is implemented, this level of growth may have significant adverse impacts upon associated cultural resources.
ISA9 – Landscape	-	Development of any form has the potential for negative effects upon landscape interest, depending on the choice of site and the manner in which they are developed. However, this proposed number of dwellings may require changes in land-use and adversely impact the landscape (inc. secondary effects such as increased facilitates and infrastructure).
ISA10 – Population	+	This option will go some way to addressing the balance of the population, with a likely increase in the younger age cohorts.
ISA11 – Welsh Language	-	Increased employment opportunities may cause substantial inward mitigation of non-Welsh speakers and indirectly reduce the proportion of Welsh speakers (especially in the short term).
ISA12 – Health and Well-being	+/-	This option sees a projected increase in the 65+ age cohort, coupled with some growth in the labour workforce age groups which could result in significant challenges in the funding and delivery of health and social care services throughout the County.
ISA13 – Education and Skills	+/-	This option sees a projected increase in the population of school going ages which, depending on where growth is distributed, could increase pressure on education services in densely populated areas, or may result in the retention of school facilities in rural areas.

| ISA14 – Economy | + | This option sees the highest creation jobs over the plan period which aligns with the Council's Regeneration ambitions. This would support COVID-19 and economic recovery, and allow businesses to expand in line with their needed. |
| ISA15 – Social Fabric | + | This option sees growth in the 65+ age cohort coupled with some growth in the labour workforce age groups which would go some way to balancing the County's population. Higher growth levels also supports the delivery of affordable housing. |

Baseline Employment-Led Scenario (2022) 9,933 dwellings		
ISA Objective	**Appraisal**	**Comments**
ISA1 – Sustainable Development	+/-	This option is likely to contribute positively to supporting a sustainable economy and a healthy, balanced society, however, as determined by the likely significant adverse impacts upon biodiversity and the wider environment, this level of growth may be outside of environmental limits.
ISA2 – Biodiversity	--	Development of any form has the potential for negative effects upon biodiversity, depending on the choice of site and the manner in which they are developed. However, this proposed number of dwellings would significantly increase the need for development on greenfield land and resulting pressure on biodiversity assets. It would likely conflict with the Area Statement (Reversing the decline of, and enhancing, biodiversity)
ISA3 – Air Quality	--	Any level of growth infers an increase in transport and economic activity which will potentially lead to increased gaseous emissions. Whilst the number of dwellings required under this option is significantly lower than the current LDP requirement and (slightly) lower than previous preferred Growth Option (PG 10 Year), this level of growth is unlikely to alleviate pressure on areas of poor air quality (AQMZs). Policies will need to mitigate potential impact upon achieving WBFGA Goals (Specifically Globally Responsible & Healthier), human health and well-being (increased traffic potentially causing secondary mental health issues), Area Statement (Cross-cutting theme: Climate Change) and upholding the Socio-Economic Duty given the unequal manner in which air quality can affect communities. Additionally, it is likely that growth at this level would lead to inappropriate siting which will lead to increased need transport.
ISA4 – Climatic Factors	-	Any level of growth infers increasing transport and economic activity and associated greenhouse gas emissions. However, whilst the number of dwellings required under this option is significantly lower than the current LDP requirement, any increase in energy efficient will not offset the increased emission of greenhouse gasses responsible for Climate Change. This would impact upon the same of the same components stated above.

ISA5 – Water	+/-	This growth option projects a household growth within the 14.6% capacity provided for in the Dwr Cymru Welsh Water (DCWW) Resource Management Plan, although provides little headroom. Developments may lead to an increase in pollutant discharged to watercourse.
ISA6 – Material Assets	-	This level of growth is likely to place pressure on recycling services and may increase use of finite resources.
ISA7 - Soil	+/-	Any level of development infers the loss of soil/permeable surfaces to hard standing. However, the number of dwellings required under this option is significantly lower than the current LDP requirement so will reduce the need for greenfield land. Nevertheless, this proposed number of dwellings would significantly increase the need for development on greenfield land/land with high ALC rating, resulting the loss of finite soil assets.
ISA8 – Cultural Heritage and Historic Environment	-	Whilst the effect of this option on ISA8 will be dependent on how growth is implemented, this level of growth may have significant adverse impacts upon associated cultural resources.
ISA9 – Landscape	--	Development of any form has the potential for negative effects upon landscape interest, depending on the choice of site and the manner in which they are developed. However, this proposed number of dwellings may require changes in land-use and adversely impact the landscape (inc. secondary effects such as increased facilitates and infrastructure).
ISA10 – Population	++	This option will go some way to addressing the balance of the population, with a likely increase in the younger age cohorts.
ISA11 – Welsh Language	--	Increased employment opportunities may cause substantial inward mitigation of non-Welsh speakers and indirectly reduce the proportion of Welsh speakers (especially in the short term).
ISA12 – Health and Well-being	+/-	This option sees a projected increase in the 65+ age cohort, coupled with some growth in the labour workforce age groups which could result in significant challenges in the funding and delivery of health and social care services throughout the County.

ISA13 – Education and Skills	+/-	This option sees a projected increase in the population of school going ages which, depending on where growth is distributed, could increase pressure on education services in densely populated areas, or may result in the retention of school facilities in rural areas.
ISA14 – Economy	++	This option sees the highest creation jobs over the plan period which aligns with the Council's Regeneration ambitions. This would support COVID-19 recovery and allow businesses to expand in line with their needed.
ISA15 – Social Fabric	+	This option sees growth in the 65+ age cohort coupled with some growth in the labour workforce age groups which would go some way to balancing the County's population. Higher growth levels also supports the delivery of affordable housing.

Rebased Principal Projection (2022) 10,461 dwellings		
ISA Objective	**Appraisal**	**Comments**
ISA1 – Sustainable Development	+/-	This option is likely to contribute positively to supporting a sustainable economy and a healthy, balanced society, however, as determined by the likely significant adverse impacts upon biodiversity and the wider environment, this level of growth may be outside of environmental limits.
ISA2 – Biodiversity	--	Development of any form has the potential for negative effects upon biodiversity, depending on the choice of site and the manner in which they are developed. However, this proposed number of dwellings would significantly increase the need for development on greenfield land and resulting pressure on biodiversity assets. It would likely conflict with the Area Statement (Reversing the decline of, and enhancing, biodiversity)
ISA3 – Air Quality	--	Any level of growth infers an increase in transport and economic activity which will potentially lead to increased gaseous emissions. Whilst the number of dwellings required under this option is significantly lower than the current LDP requirement and (slightly) lower than previous preferred Growth Option (PG 10 Year), this level of growth is unlikely to alleviate pressure on areas of poor air quality (AQMZs). Policies will need to mitigate potential impact upon achieving WBFGA Goals (Specifically Globally Responsible & Healthier), human health and well-being (increased traffic potentially causing secondary mental health issues), Area Statement (Cross-cutting theme: Climate Change) and upholding the Socio-Economic Duty given the unequal manner in which air quality can affect communities. Additionally, it is likely that growth at this level would lead to inappropriate siting which will lead to increased need transport.
ISA4 – Climatic Factors	-	Any level of growth infers increasing transport and economic activity and associated greenhouse gas emissions. However, whilst the number of dwellings required under this option is significantly lower than the current LDP requirement, any increase in energy efficient will not offset the increased emission of greenhouse gasses responsible for Climate Change. This would impact upon the same of the same components stated above.

ISA5 – Water	+/-	This growth option projects a household growth within the 14.6% capacity provided for in the Dwr Cymru Welsh Water (DCWW) Resource Management Plan, although provides little headroom. Developments may lead to an increase in pollutant discharged to watercourse.
ISA6 – Material Assets	-	This level of growth is likely to place pressure on recycling services and may increase use of finite resources.
ISA7 - Soil	+/-	Any level of development infers the loss of soil/permeable surfaces to hard standing. However, the number of dwellings required under this option is significantly lower than the current LDP requirement so will reduce the need for greenfield land. Nevertheless, this proposed number of dwellings would significantly increase the need for development on greenfield land/land with high ALC rating, resulting the loss of finite soil assets.
ISA8 – Cultural Heritage and Historic Environment	-	Whilst the effect of this option on ISA8 will be dependent on how growth is implemented, this level of growth may have significant adverse impacts upon associated cultural resources.
ISA9 – Landscape	--	Development of any form has the potential for negative effects upon landscape interest, depending on the choice of site and the manner in which they are developed. However, this proposed number of dwellings may require changes in land-use and adversely impact the landscape (inc. secondary effects such as increased facilitates and infrastructure).
ISA10 – Population	++	This option will go some way to addressing the balance of the population, with a likely increase in the younger age cohorts.
ISA11 – Welsh Language	--	Increased employment opportunities may cause substantial inward mitigation of non-Welsh speakers and indirectly reduce the proportion of Welsh speakers (especially in the short term).
ISA12 – Health and Well-being	+/-	This option sees a projected increase in the 65+ age cohort, coupled with some growth in the labour workforce age groups which could result in significant challenges in the funding and delivery of health and social care services throughout the County.

ISA13 – Education and Skills	+/-	This option sees a projected increase in the population of school going ages which, depending on where growth is distributed, could increase pressure on education services in densely populated areas, or may result in the retention of school facilities in rural areas.
ISA14 – Economy	++	This option sees the highest creation jobs over the plan period which aligns with the Council's Regeneration ambitions. This would support COVID-19 recovery and allow businesses to expand in line with their needed.
ISA15 – Social Fabric	+	This option sees growth in the 65+ age cohort coupled with some growth in the labour workforce age groups which would go some way to balancing the County's population. Higher growth levels also supports the delivery of affordable housing.

Appendix F

ISA Strategic Policies

Appendix F: ISA Strategic Policies

This document contains the amended policies and the ISA commentary of the reassessment of the strategic policies contained with the rLDP. It should be read in conduction with Chapter 6.4 of the ISA report. A summary of the results of the re-assessment against the ISA Framework are presented in Table 17 of the ISA report.

The table below contains the assessment criteria for draft policies and reasonable alternatives, as adapted from Welsh Government Development Plans Manual Edition 3 (2020).

Symbol	Predicted Effect	Suggested action/response
++	Very positive effect – the subject of the appraisal would significantly help in achieving the Sustainability objective.	Consider whether very positive effect can be further enhanced
+	Positive effect - the subject of the appraisal would help in achieving the Sustainability objective.	Consider whether positive effect can be further enhanced
+/-	Positive and negative effects – the subject of the appraisal would help some elements of the Sustainability objective whilst hindering others.	Consider mitigation for negative effects and whether positive effects can be enhanced
-	Negative effect - the subject of the appraisal would conflict with the Sustainability objective.	Consider mitigation such as delete/reconsider/amend the policy or site allocation; reconsider the policy or proposed use.
--	Very negative effect - the subject of the appraisal would be in significant conflict with the Sustainability objective.	Significant mitigation measures to reduce severity or effect; reconsider the policy or proposed use
I	Effect on the Sustainability objective depends on how the policy and allocation are implemented	Suggestions for implementation
0	Neutral effect compared to the current situation	Consider whether intervention could bring positive effects
?	Uncertain effect – more information needed	Consider where this will come from – who has it? What will be done about collecting it? When will it be collected?

SP1: Strategic Growth

ISA Objective	Appraisal	Commentary	Mitigating Plan Policies
ISA1 – Sustainable Development	I	This policy looks to support a sustainable economy by providing opportunities for needs to be met locally. However, as a matter of principle, all development is likely to increase localised pollution (air, water, or land (soil contamination) which will need to be appropriately addressed in accordance with the mitigation hierarchy (avoid, minimise, mitigate/compensate) to counter the adverse environmental effects. Consequently, this conflicts with 1-1 of ISA1 and, therefore, the effect is predicted to be dependent on the implementation of policy/allocations.	See all relevant policies below.
ISA2 – Biodiversity	-	Growth in rural areas is likely to impact on greenfield land and undisturbed areas of biodiversity.	SP12: Placemaking and Sustainable Places SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks, and Features Of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4 Green Infrastructure – Trees, Woodlands and Hedgerows
ISA3 – Air Quality	-	This policy supports population and economic growth, both of which are likely to lead to a significant increase in transport (domestic and economic) and associated traffic related air pollution.	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network

ISA4 – Climatic Factors	-	This policy supports population and economic growth, both of which are likely to lead to a significant increase in transport (domestic and economic) and associated carbon emissions.	SP12: Placemaking and Sustainable Places CCH3: Electric Vehicle Charging Points CCH5: Flood Risk Management and Avoidance TRA2: Active Travel
ISA5 – Water	I	This policy provides for a housing growth within the 14.6% capacity provided for in Dŵr Cymru Welsh Water's (DCWW) Resource Management Plan. Nevertheless, development would lead to an increase in diffuse pollution and wastewater which could adversely impact SACs catchments. Therefore, the alignment of this policy with IISA5 is dependent on the choice of sites and manner in which they are developed.	CCH4: Water Quality and Protection of Water Resources CCH5: Flood Risk Management and Avoidance SP 12: Placemaking and Sustainable Places SP 16: Climate Change NE1: Regional and Local Designations NE2: Biodiversity
ISA6 – Material Assets	+	Growth, especially in rural areas, has the potential to create and/or retain communities with population densities high enough to support facilities and services leading to needs being met locally.	
ISA7 - Soil	I	The alignment of this policy with ISA7 is dependent on the choice of sites and manner in which they are developed	PSD3: Green and Blue Infrastructure Networks SP14: Maintaining and Enhancing the Natural Environment PSD1: Effective Design Solutions: Sustainability and Placemaking
ISA8 – Cultural Heritage and Historic Environment	I	The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed	SP15: Protection and Enhancement of the Built and Historic Environment BHE1: Listed Buildings and Conservation Areas BHE2: Landscape Character NE1: Regional and Local Designations SP 12: Placemaking and Sustainable Places

			PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods.
ISA9 – Landscape	I	The alignment of this policy with ISA9 is dependent on the choice of sites and manner in which they are developed.	PSD1 : Effective Design Solutions: Sustainability and Placemaking BHE2: Landscape Character
ISA10 – Population	++	This supports a level of growth that will provide a significant number of affordable homes, in both urban and rural areas. Also, the creation of new jobs is likely to help retain young people in the county.	
ISA11 – Welsh Language	+/-	Alignment of this policy with ISA11 is difficult to determine. Growth and inward migration at this scale is assumed to potentially dilute Welsh language and culture in certain areas. However, it does increase the potential for retaining young Welsh speakers in the county and so may also have a positive effect.	WL1: Welsh Language and New Developments PSD9: Advertisements
ISA12 – Health and Well-being	+	Growth, especially in rural areas, has the potential to create and/or retain communities with population densities high enough to support new, accessible leisure and health care facilities.	PSD6: Community Facilities
ISA13 – Education and Skills	+	Growth, especially in rural areas, has the potential to create and/or retain communities with population densities high enough to support new, accessible educational and training facilities.	

ISA14 – Economy	++	Supports growth at a level that will create a minimum of 5,307 jobs over the plan period, in line with the Council's core ambitions.
ISA15 – Social Fabric	+	This supports a level of growth that will provide a significant number of affordable homes in both urban and rural areas.
IISA Comments and recommendations		
• Any residual negative impacts and remaining uncertainty can be sufficiently mitigated by revised LDP Plan Policies.		

SP 2: Retail and Town Centres

ISA Objective	Appraisal	Comments	Mitigating Plan Policies
ISA1 – Sustainable Development	+		
ISA2 – Biodiversity	I	Any development has potential for negative impacts on biodiversity, but at a strategic level, it is difficult to determine more specific impacts. The choice of sites and the manner in which they are developed would determine the way in which biodiversity would be affected.	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4 Green Infrastructure – Trees, woodlands, and hedgerows PSD12: Light and Air Pollution
ISA3 – Air Quality	+/-	This policy does encourage attractiveness of town centres which may increase access via public car, in particular to towns such as Carmarthen, Llanelli and Llandeilo which currently all have AQMA's. However, town centres are well serviced by public transport meaning that they are accessible by alternative transport networks. The policy does make explicit reference to evidencing a sites access to sustainable modes of transport if sited outside of town centres.	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network
ISA4 – Climatic Factors	+/-	This policy does encourage attractiveness of town centres which may increase access via public car and associated carbon emissions. However, town centres are well serviced by public transport meaning that they are accessible by alternative transport networks. The policy does make explicit reference to evidencing a sites	SP 16: Climate Change CCH3: Electric Vehicle Charging Points TRA2: Active Travel PSD12: Light and Air Pollution

		access to sustainable modes of transport if sited outside of town centres.	
ISA5 – Water	I	Effects on water quality and supply is largely dependent on the choice of sites and manner in which they are developed.	SP9: Infrastructure SP16: Climate Change CCH4: Water Quality and Protection of Water Resources
ISA6 – Material Assets	0		
ISA7 - Soil	I	The alignment of this policy with ISA7 is dependent on the choice of sites and manner in which they are developed	PSD3: Green and Blue Infrastructure Networks SP14: Maintaining and Enhancing the Natural Environment.
ISA8 – Cultural Heritage and Historic Environment	I	The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
ISA9 – Landscape	+	This policy supports the protection and enhancement of existing townscapes.	
ISA10 – Population	+	Protecting and enhancing the vibrancy, viability and attractiveness of our retail centres is likely to contribute to the retention of young people in the County.	
ISA11 – Welsh Language	+/-	Protecting and enhancing the vibrancy, viability and attractiveness of our retail centres is likely to contribute to the retention of young people in the County, which in turn is likely to have positive effects on the Welsh	WL1: Welsh Language and New Developments PSD9: Advertisements

		Language. Provisions have also been made for new rural retail facilitates which may serve Welsh language strongholds. However, large developments are likely to lead to workforce changes which may impact adversely upon the language.	
ISA12 – Health and Well-being	0		
ISA13 – Education and Skills	0		
ISA14 – Economy	++	Protecting and enhancing the vibrancy, viability and attractiveness of our retail centres will have strong positive effects on the County's economy.	
ISA15 – Social Fabric	+	This policy promotes the accessibility to services and considers the needs of the population	

ISA Comments and Recommendations

- Mitigation for any air quality impacts could be further strengthened by making a specific reference to the protection and enhancement of GI within and adjacent to AQMA's in policy PSD12 Light and Air Quality.
- Any residual negative impacts and remaining uncertainty can be sufficiently mitigated by revised LDP Plan Policies.

SP 3: Sustainable Distribution – Settlement Hierarchy

ISA Objective	Appraisal	Comments	Mitigating Policies
ISA1 – Sustainable Development	+/-	The division of the settlement hierarchy into clusters provides a framework for sustainable development, allowing needs to be addressed locally and supporting a sustainable economy, in both rural and urban areas of the County. Nevertheless, the provision of growth and development to rural areas is likely to impact on greenfield land and undisturbed areas of biodiversity. Alongside negative factors outlined in ISA3 and ISA4, this is likely to be contrary to living within environmental limits 1-1.	See relevant policies below.
ISA2 – Biodiversity	-	Provision of growth and development to rural areas is likely to impact on greenfield land and undisturbed areas of biodiversity.	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: Green Infrastructure – Trees, Woodlands and Hedgerows
ISA3 – Air Quality	+/-	Directing growth to sustainable locations with sufficient access to facilities, services and public transport links is likely to reduce private car use and associated air pollution. Whilst the majority of development will be directed to the top tiers of the settlement hierarchy, growth in rural area may be contrary to this.	TRA2: Active Travel CCH3: Electric Vehicle Charging Points
ISA4 – Climatic Factors	+/-	Directing growth to sustainable locations with sufficient access to facilities, services and transport is likely to	CCH6: Renewable and Low Carbon Energy in New Developments

		reduce private car use and associated carbon emissions. The policy does make explicit reference to evidencing a sites access to sustainable modes of transport if sited outside of town centres. It is largely dependent on the choice of sites and manner in which they are developed – the policy does make explicit reference to evidencing (AQMZs). However, widespread distribution across both urban and rural area is likely to increase vulnerability of Carmarthenshire to the effects of climate change (4-2), and adversely impact upon climate resilience.	SP 16: Climate Change CCH3: Electric Vehicle Charging Points TRA2: Active Travel PSD12: Light and Air Pollution
ISA5 – Water	**I**	The alignment of this policy with ISA5 is dependent on the choice of sites and manner in which they are developed. Information required from DCWW Review of Consents as to site specific capacity for growth with respect to water abstraction and waste water treatment.	SP 9: Infrastructure SP 12: Placemaking and Sustainable Places CCH4: Water Quality and the Protection of Water Resources CCH5: Flood Risk Management and Avoidance INF5: Rural Allocations outside Public Sewerage System Catchments (SG3)
ISA6 – Material Assets	**+/-**	Directing growth to sustainable locations with sufficient access to facilities and services is likely to allow needs to be met locally. It is also likely to maximise access to public transport. Additional, allowances are made for the provision of local housing needs. However, widespread distribution may decrease resource efficiency by reducing the chance for people to make more sustainable transport choices.	CCH3: Electric Vehicle Charging Points TRA2: Active Travel
ISA7 - Soil	**I**	The alignment of this policy with ISA7 is dependent on the choice of sites and manner in which they are developed.	PSD3: Green and Blue Infrastructure Networks SP14: Maintaining and Enhancing the Natural Environment.

ISA8 – Cultural Heritage and Historic Environment	I	The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
ISA9 – Landscape	I	The alignment of this policy with ISA9 is dependent on the choice of sites and manner in which they are developed	SP12: Placemaking and Sustainable Places PSD1: Effective Design Solutions: Sustainability and Placemaking BHE2: Landscape Character
ISA10 – Population	++	Distribution of development to sustainable locations in both urban and rural settlements is likely to result in vibrant and viable communities, which will in turn help to retain and attract young people	
ISA11 – Welsh Language	?	Alignment of this policy with ISA11 is difficult to determine. Growth and inward migration at this scale is assumed to potentially dilute Welsh language and culture in certain areas. However, it does increase the potential for retaining young Welsh speakers in the county and so may also have a positive effect. With limited data to make an informed appraisal, providing monitoring data on the relationship between Growth Distribution and impact on Welsh language communities will help future understanding.	WL1: Welsh Language and New Developments
ISA12 – Health and Well-being	+	Growth in line with the settlement hierarchy has the potential to create and/or retain communities with population densities high enough to support new, accessible leisure and health care facilities.	

ISA13 – Education and Skills	**+**	Growth in line with the settlement hierarchy has the potential to create and/or retain communities with population densities high enough to support new, accessible educational and training facilities.
ISA14 – Economy	**++**	Growth in line with the settlement hierarchy provides opportunity to support sustainable rural and urban economies across the county.
ISA15 – Social Fabric	**++**	Growth in line with the settlement hierarchy provides opportunity to address needs locally and to promote the design of vibrant, inclusive settlements.
ISA Comments and Suggestions		

- Thoughts should be made to paragraph 4.2.24 (PPW) relating to the potential cumulative effects of development occurring thought the plan period within the open countryside (and tier 4 settlements). Multiple developments permitted under local needs housing could have a permanent adverse effect upon the landscape, and limit accessibility to services, sustainable travel, and community facilities. Local needs should have a locational and/or resource requirement aspects, and help to ensure the viability of the local community - providing benefits for support socio-economic ISA objectives.

SP 4: A Sustainable Approach to Providing New Homes			
ISA Objective	**Appraisal**	**Comments**	**Mitigating Policies**
ISA1 – Sustainable Development	I	This policy looks to support a sustainable economy by providing opportunities for needs to be met locally (ISA1). However, as a matter of principle, all development is likely to increase localised pollution (air, water, or land (soil contamination) which will need to be appropriately addressed in accordance with the mitigation hierarchy (avoid, minimise, mitigate/compensate) to counter the adverse environmental effects. Consequently, this conflicts with 1-1 of ISA1 and, therefore, the effect is predicted to be dependent on the implementation of policy/allocations.	See all relevant policies below.
ISA2 – Biodiversity	-	Housing provision, in particular in rural areas, is likely to impact on greenfield land and undisturbed areas of biodiversity.	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: Green Infrastructure – Trees, Woodlands and Hedgerows INF5: Rural Allocations outside Public Sewerage System Catchments
ISA3 – Air Quality	-	This policy supports the provision of new homes, which is likely to lead to a significant increase in transport (domestic and economic) and associated traffic related air pollution.	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network CCH6: Renewable and Low Carbon Energy in New Developments SP 16: Climate Change CCH3: Electric Vehicle Charging Points TRA2: Active Travel

			PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network
ISA4 – Climatic Factors	-	This policy supports the provision of new homes which is likely to lead to a significant increase in transport (domestic and economic) and associated carbon emissions.	CCH6: Renewable and Low Carbon Energy in New Developments SP 16: Climate Change CCH3: Electric Vehicle Charging Points TRA2: Active Travel PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network
ISA5 – Water	I	This policy provides for a housing growth within the 14.6% capacity provided for in Dŵr Cymru Welsh Water's (DCWW) Resource Management Plan. Nevertheless, development would lead to an increase in diffuse pollution and wastewater which could adversely impact SACs catchments. Therefore, the alignment of this policy with ISA5 is dependent on the choice of sites and manner in which they are developed.	INF5: Rural Allocations outside Public Sewerage System Catchments CCH4: Water Quality and Protection of Water Resources SP 16: Climate Change NE1: Regional and Local Designations NE2: Biodiversity
ISA6 – Material Assets	+	Growth, especially in rural areas, has the potential to create and/or retain communities with population densities high enough to support facilities and services leading to needs being met locally.	
ISA7 - Soil	I	The alignment of this policy with ISA7 is dependent on the choice of sites and manner in which they are developed	PSD3: Green and Blue Infrastructure Networks SP14: Maintaining and Enhancing the Natural Environment.

ISA8 – Cultural Heritage and Historic Environment	I	The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
ISA9 – Landscape	+/-	The policy specifically outlines criteria for sustainable development, including a presumption against inappropriate development outside of development limits (except where they are subject to other policies of this Plan, e.g., BHE2).	BHE2: Landscape Character BHE1: Listed Buildings and Conservation Areas
ISA10 – Population	++	This supports a level of growth that will provide a significant number of affordable homes, in both urban and rural areas. Also, the creation of new jobs is likely to help retain young people in the county.	
ISA11 – Welsh Language	+/-	Alignment of this policy with ISA11 is difficult to determine. Growth and inward migration has the potential to dilute Welsh language and culture in certain areas, although may also provide housing in rural areas with a high proportion of Welsh Speakers. However, it does increase the potential for retaining young Welsh speakers in the county and so may also have a positive effect.	WL1: Welsh Language and New Developments PSD9: Advertisements

ISA12 – Health and Well-being	+	Growth, especially in rural areas, has the potential to create and/or retain communities with population densities high enough to support new, accessible leisure and health care facilities.	
ISA13 – Education and Skills	+	Growth, especially in rural areas, has the potential to create and/or retain communities with population densities high enough to support new, accessible educational and training facilities.	
ISA14 – Economy	++	Supports growth at a level that will create a minimum of 4,140 jobs over the plan period, in line with the Council's core ambitions.	
ISA15 – Social Fabric	+	This supports a level of growth that will provide a significant number of affordable homes in both urban and rural areas.	
ISA Comments and Recommendations			
• Any residual negative impacts and remaining uncertainty can be sufficiently mitigated by revised LDP Plan Policies.			

SP 5: Affordable Homes Strategy			
ISA Objective	**Appraisal**	**Comments**	**Mitigating Policies**
ISA1 – Sustainable Development	I	This policy looks to support a sustainable economy by providing opportunities for needs to be met locally (ISA1). However, as a matter of principle, all development is likely to increase localised pollution (air, water, or land (soil contamination) which will need to be appropriately addressed in accordance with the mitigation hierarchy (avoid, minimise, mitigate/compensate) to counter the adverse environmental effects. Consequently, this conflicts with 1-1 of ISA1 and, therefore, the effect is predicted to be dependent on the implementation of policy/allocations.	See all relevant policies below.
ISA2 – Biodiversity	-	Housing provision, particularly in rural areas, is likely to impact on greenfield land and undisturbed areas of biodiversity.	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3 Corridors, networks, and features of distinctiveness PSD3: Green and Blue Infrastructure Network PSD4 Green Infrastructure – Trees, woodlands, and hedgerows
ISA3 – Air Quality	-	Affordable housing located In rural areas may result in an increase in private car use and associated air quality issues if not located near good public transport networks and active travel routes.	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network CCH6: Renewable and Low Carbon Energy in New Developments SP 16: Climate Change CCH3: Electric Vehicle Charging Points TRA2: Active Travel PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network

ISA4 – Climatic Factors	-	Affordable housing located In rural areas may result in an increase in private car use and associated CO_2 emissions if not located near good public transport networks and active travel routes.	CCH6: Renewable and Low Carbon Energy in New Developments SP 16: Climate Change CCH3: Electric Vehicle Charging Points TRA2: Active Travel PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network
ISA5 – Water	l	This policy provides for a housing growth within the 14.6% capacity provided for in Dŵr Cymru Welsh Water's (DCWW) Resource Management Plan. Nevertheless, development would lead to an increase in diffuse pollution and wastewater which could adversely impact SACs catchments. Therefore, the alignment of this policy with ISA5 is dependent on the choice of sites and manner in which they are developed.	INF5: Rural Allocations outside Public Sewerage System Catchments CCH4: Water Quality and Protection of Water Resources SP 16: Climate Change NE1: Regional and Local Designations NE2: Biodiversity
ISA6 – Material Assets	+	Growth, especially in rural areas, has the potential to create and/or retain communities with population densities high enough to support facilities and services leading to needs being met locally.	
ISA7 - Soil	l	The alignment of this policy with ISA7 is dependent on the choice of sites and manner in which they are developed	PSD3: Green and Blue Infrastructure Networks SP14: Maintaining and Enhancing the Natural Environment.
ISA8 – Cultural Heritage and Historic Environment	l	The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods

ISA9 – Landscape	I	The alignment of this policy with ISA9 is dependent on the choice of sites and manner in which they are developed	SP12: Placemaking and Sustainable Places PSD1: Effective Design Solutions: Sustainability and Placemaking BHE2: Landscape Character
ISA10 – Population	++	Residents who otherwise may not be able to afford to live and work in the County are able to access affordable housing and remain in the County. In particular, this policy supports disadvantaged groups in society as well as young persons.	
ISA11 – Welsh Language	+	The delivery of a minimum 1700 affordable homes to reflect the LHMA and support the delivery of balanced and sustainable communities should in principle be helpful in encouraging the growth of the Welsh language. However, growth and inward migration may still have the potential to dilute Welsh language and culture in certain areas. Carmarthenshire has a large proportion of Welsh speakers, and this policy will support residents who otherwise may not be able to afford to live and work in the County are able to access affordable housing and remain in the County. However, this policy does increase the potential for retaining young Welsh speakers in the county and is, therefore, considered to have a minor positive effect.	WL1: Welsh Language and New Developments PSD9: Advertisements
ISA12 – Health and Well-being	+	Growth, especially in rural areas, has the potential to create and/or retain communities with population densities high enough to support new, accessible leisure and health care facilities.	

ISA13 – Education and Skills	+	Growth, especially in rural areas, has the potential to create and/or retain communities with population densities high enough to support new, accessible educational and training facilities.	
ISA14 – Economy	+	Residents who otherwise may not be able to afford to live and work in the County are able to access affordable housing and remain in the County.	
ISA15 – Social Fabric	++	Policy facilitates the delivery of affordable housing, which in turn, removes barriers and creates opportunities for disadvantaged sections of society.	

ISA Comments and Recommendations

- Suggested that due to likely need for affordable housing in rural as well as urban areas of Carmarthenshire, policy SP5 make specific reference be made in the supporting text to the protection of the natural environment when locating affordable housing and sensitivity to Welsh language resilience.
- Suggested that policy SP5 make specific reference in the supporting text to locating affordable housing in locations with good access to public transport networks as well as active travel routes.
- Any residual negative impacts and remaining uncertainty can be sufficiently mitigated by revised LDP Plan Policies, and access to facilities should be enhanced through PSD6: Community Facilities.

SP 6: Strategic Sites			
ISA Objective	**Appraisal**	**Comments**	**Mitigating Policies**
ISA1 – Sustainable Development	+	This policy looks to support a sustainable economy, and provides opportunity for needs to be met locally.	
ISA2 – Biodiversity	I	Any development infers potential for negative impacts on biodiversity, but at a strategic level, it is difficult to determine more specific impacts. These will be assessed at a planning application. It should be noted that Llanelli Life Science and Well-being village is immediately adjacent to the Carmarthen Bay and Estuaries European Marine Site.	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: Green Infrastructure – Trees, Woodlands and Hedgerows
ISA3 – Air Quality	+/-	Both sites are outside of the established AQMA's in both Carmarthen and Llanelli, however, have the potential to increase traffic and related air pollution. Both sites are strategic and well serviced by public transport networks.	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network
ISA4 – Climatic Factors	+/-	Both sites have the potential to increase traffic and related air pollution. Both sites are strategic and well serviced by public transport networks.	CCH3: Electric Vehicle Charging Points TRA2: Active Travel

ISA5 – Water	0	Both sites have been through the planning process and DCWW have Review of Consents as to site specific capacity for growth with respect to water abstraction and waste water treatment. The need for any additional provision will be subject to consultation with DCWW.	SP9: Infrastructure CCH4: Water Quality and Protection of Water Resources
ISA6 – Material Assets	+	Both sites are well serviced and have access to facilities, allowing need to be met locally. They are also well serviced by public transport.	
ISA7 - Soil	I	Any development infers the loss of soil/permeable surfaces to hard standing. However, it is difficult to predict impacts at a strategic level. The alignment of this policy with ISA7 is dependent on the choice of sites and manner in which they are developed	PSD3: Green and Blue Infrastructure Networks SP14: Maintaining and Enhancing the Natural Environment.
ISA8 – Cultural Heritage and Historic Environment	I	The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
ISA9 – Landscape	I	The alignment of this policy with ISA9 is dependent on the choice of sites and manner in which they are developed	SP12: Placemaking and Sustainable Places PSD1: Effective Design Solutions: Sustainability and Placemaking BHE2: Landscape Character
ISA10 – Population	++	This policy would contribute towards aligning development with significant, skilled employment opportunities which is likely to	

		encourage the retention of young people in the county. The Llanelli Life Science and Well-being village is also in an area of high deprivation and so is likely to create opportunities for disadvantaged communities.	
ISA11 – Welsh Language	++	Yr Egin is the base for the Welsh language broadcaster S4C and is a new development space for creative and digital companies with promotion of the Welsh language at the heart of the development. The significant job creation as a result of both strategic sites is likely to create opportunities for young people in the county, a proportion of which are Welsh speaking. Pentre Awel, Llanelli, is a partnership between several organisations (local colleges, universities, and health board) which promote the Welsh Language. However, uncertainty remains as to the effects of in migration of non-Welsh speakers to the county as a result of these developments.	This scoring was upheld through: WL1: Welsh Language and New Developments PSD9: Advertisements
ISA12 – Health and Well-being	++	Llanelli Life Science and Well-being village is to be a wellness hub where multiple services will be available in one location. Aligning development with this will have positive effects on health and wellbeing.	
ISA13 – Education and Skills	++	Both facilities create opportunities for shared learning, inward investment and inflow of skills to the county, all of which are predicted to have strong positive effects.	
ISA14 – Economy	++	Both facilities are part of significant inward investment to the county and have the potential to create thousands of high quality jobs.	

ISA15 – Social Fabric	++	This policy would contribute towards aligning development with significant, skilled employment opportunities and in the case of Llanelli, in areas of high deprivation and so is likely to create opportunities for disadvantaged	

ISA Comments and Recommendations

- Any potential for negative impacts on the water quality of the Carmarthen Bay and Estuaries European Marine Site is further mitigated by the Burry Inlet SPG and accompanying Memorandum of Understanding, which requires developers to undertake compensatory water removal in catchments which drain into CBEEMS.
- Any residual negative impacts and remaining uncertainty can be sufficiently mitigated by revised LDP Plan Policies.

SP 7: Employment and the Economy

ISA Objective	Appraisal	Comments	Mitigating Policies
ISA1 – Sustainable Development	+	Allocation of employment land in both urban and rural areas, as well as in support of the Swansea Bay City deal is likely to create numerous high quality employment opportunities which will contribute positively to a sustainable economy and social inclusion.	
ISA2 – Biodiversity	-	Any development infers potential for negative impacts on biodiversity, but at a strategic level, it is difficult to determine more specific impacts. These will be assessed at a site appraisal stage. It is likely that employment land will be allocated in rural areas which is likely to impact on greenfield land.	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: Green Infrastructure – Trees, Woodlands and Hedgerows
ISA3 – Air Quality	+/-	Allocation of employment land in line with the plans' spatial strategy/settlement framework and sustainability principles is likely to reduce the need to travel, and as a result car related emissions. However, employment land will inevitably increase numbers and frequencies of HGV's which are likely to contribute to existing air quality issues.	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network
ISA4 – Climatic Factors	+	Allocation of employment land in line with the plans' spatial strategy/settlement framework is likely to decrease the need to travel.	
ISA5 – Water	?	Employment development will increase the level of demand for water supply and sewerage discharge, but	SP9: Infrastructure CCH4: Water Quality and Protection of Water Resources

		at a strategic level it is difficult to determine more specific impacts. These will be assessed at the planning application stage and will be subject to consultation with DCWW.	
ISA6 – Material Assets	+	Allocation of employment land in line with the plans' spatial strategy/settlement framework is likely to reduce the need to travel.	
ISA7 - Soil	I	Any development infers the loss of soil/permeable surfaces to hard standing. However, it is difficult to predict impacts at a strategic level. The alignment of this policy with ISA7 is dependent on the choice of sites and manner in which they are developed	PSD3: Green and Blue Infrastructure Networks SP14: Maintaining and Enhancing the Natural Environment.
ISA8 – Cultural Heritage and Historic Environment	I	The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
ISA9 – Landscape	I	The alignment of this policy with ISA9 is dependent on the choice of sites and manner in which they are developed.	SP12: Placemaking and Sustainable Places PSD1: Effective Design Solutions: Sustainability and Placemaking BHE2: Landscape Character
ISA10 – Population	++	Allocation of employment land in both urban and rural areas, as well is in support of the Swansea Bay City deal is likely to create numerous high quality employment opportunities which will contribute positively to promoting the retention of young people and social inclusion.	

ISA11 – Welsh Language	+	The allowance of appropriate small scale employment opportunities in rural areas to support rural communities, as well as those larger employment sites, is likely to create a mix of employment choices across the county which may in turn encourage the retention of young people. This would result in positive impacts on the Welsh Language.
ISA12 – Health and Well-being	0	
ISA13 – Education and Skills	+	Creating a diverse range of employment opportunities across the county in both rural and urban areas increases the potential and accessibility of education and skills facilities.
ISA14 – Economy	++	Allocation of employment land in both urban and rural areas, as well is in support of the Swansea Bay City deal is likely to create numerous high quality employment opportunities which will contribute positively to a sustainable economy.
ISA15 – Social Fabric	+	Increasing employment land in both urban and rural areas will contribute positively to promoting the retention of young people and social inclusion.

ISA Comments and Suggestions

- Any residual negative impacts and remaining uncertainty can be sufficiently mitigated by revised LDP Plan Policies.
- Make provision to highlight the fact that employment developments may also including landscaping, buffer zones, and GBI.

SP 8: Welsh Language and Culture			
ISA Objective	**Appraisal**	**Comments**	**Mitigating Policies**
ISA1 – Sustainable Development	+	This policy looks to protect and enhance the social fabric of the County's communities.	
ISA2 – Biodiversity	0		
ISA3 – Air Quality	0		
ISA4 – Climatic Factors	0		
ISA5 – Water	0		
ISA6 – Material Assets	0		
ISA7 - Soil	0		
ISA8 – Cultural Heritage and Historic Environment	+	This policy looks to protect local cultural distinctiveness from potential negative effects as a result of development.	
ISA9 – Landscape	0		

ISA10 – Population	++	Promoting Welsh language and ensuring sufficient employment and housing opportunities are likely to help retain young Welsh speakers within the County.	
ISA11 – Welsh Language	++	This Policy encourages the growth of the Welsh Language and directly related with ISA11.	
ISA12 – Health and Well-being	0		
ISA13 – Education and Skills	+	Protecting and enhancing Welsh Language and Culture is likely to have a positive effect on Welsh literacy.	
ISA14 – Economy	+	Promoting Welsh language and ensuring sufficient employment and housing opportunities are likely to help retain young Welsh speakers within the County.	
ISA15 – Social Fabric	++	This policy looks to protect and enhance the social fabric of the County's communities.	
ISA Comments and Recommendations			

- There are no negative impacts predicted as a result of this policy
- To strengthen this policy further, specific reference should be made to the motion that was passed by council in July 2019 that called for the whole county to be considered as linguistically sensitive and to be a material planning consideration in all developments of 10 houses or more, and in 5+ rural areas.

SP 9: Infrastructure

ISA Objective	Appraisal	Comments	Mitigating Policies
ISA1 – Sustainable Development	+	This policy underpins the ability to deliver develop sustainably, ensuring access to services and facilities and creating sustainable economic centres.	
ISA2 – Biodiversity	+/-	Siting development in areas with sufficient infrastructure capacity may be at the detriment of biodiversity. However, encouraging needs to be catered for locally will reduce private car use and associated air pollution which currently impact on some European designated sites in Carmarthenshire.	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: Green Infrastructure – Trees, Woodlands and Hedgerows
ISA3 – Air Quality	+	This policy will direct development to areas with capacity for growth including access to services and facilities which will reduce reliance on private car use.	
ISA4 – Climatic Factors	+	This policy will direct development to areas with capacity for growth including access to services and facilities which will reduce reliance on private car use.	
ISA5 – Water	+	Directing development to areas with sufficient or potential capacity for growth will ensure water resources are protected. The policy also makes specific reference to compliance with the Burry Inlet SPG which is in place to protect the water quality of the Carmarthen Bay and Estuaries European Marine Site.	

ISA6 – Material Assets	+	This policy will direct development to areas with capacity for growth including access to services and facilities which will encourage needs to be met locally.	
ISA7 - Soil	-	Development directed to locations with sufficient infrastructure may reduce flexibility to promote regeneration of land.	PSD3: Green and Blue Infrastructure Networks SP14: Maintaining and Enhancing the Natural Environment.
ISA8 – Cultural Heritage and Historic Environment	+/-	Development directed to locations with sufficient infrastructure may reduce flexibility to avoid sensitive cultural heritage and historic environment features. Nevertheless, well designed facilities could reflect local character and distinctiveness, and also provide further access to assets.	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
ISA9 – Landscape	-	Development directed to locations with sufficient infrastructure may reduce flexibility to avoid sensitive landscape areas.	SP12: Placemaking and Sustainable Places PSD1: Effective Design Solutions: Sustainability and Placemaking BHE2: Landscape Character
ISA10 – Population	++	This policy will direct development to areas with capacity for growth including access to services and facilities which will maximise access to services and facilities, especially for disadvantaged members of society.	
ISA11 – Welsh Language	I	The alignment of this policy with ISA11 is dependent on the type of infrastructure, its' situation, and manner in which they are developed.	WL1: Welsh Language and New Developments PSD9: Advertisements
ISA12 – Health and Well-being	+	This policy will increase accessibility to services and facilities including health and leisure facilities.	

ISA13 – Education and Skills	+	This policy will increase accessibility to services and facilities including education and skills facilities. This policy also considers education support in its definition of infrastructure. Development proposals must consider the provision of such infrastructure prior to development.	
ISA14 – Economy	+	Development directed to locations with sufficient infrastructure is likely to create viable economic centres supported by a local workforce and market. This policy also supports digital infrastructure which is often essential to support employment development.	
ISA15 – Social Fabric	++	This policy will direct development to areas with capacity for growth including access to services and facilities which will maximise access to services and facilities, especially for disadvantaged members of society.	
ISA Comments and Suggestions			
• Any residual negative impacts and remaining uncertainty can be sufficiently mitigated by revised LDP Plan Policies.			

SP 10: Gypsy and Traveller Provision			
ISA Objective	**Appraisal**	**Comments**	**Mitigating Policies**
ISA1 – Sustainable Development	+	This policy promotes the inclusion of Gypsy and Traveller community by allocating land to specifically address their housing need.	
ISA2 – Biodiversity	I	The boundary of the Pen-y-fan site has some scrub habitat which has biodiversity value. The SA recommends that this is retained as a buffer to the adjoining railway line. The proposed extension to the existing Pen-y-bryn site as well as the new site will both be subject to planning permission and a HRA carried out if required.	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: Green Infrastructure – Trees, Woodlands and Hedgerows
ISA3 – Air Quality	0		
ISA4 – Climatic Factors	-	Gypsy and Traveller Sites are categorised as Highly Vulnerable development under Planning Policy Wales Technical Advice Note 15 (2004). It is noted that the 3 locations listed under SP10 are affected to varying degrees in relation to the Development Advice Map Zone C1.	SP9: Infrastructure CCH4: Water Quality and Protection of Water Resources CCH5: Flood Risk Management and Avoidance SP16: Climate Change
ISA5 – Water	I	To ensure no water quality impacts on the Carmarthen Bay and Estuaries European Marine site, both the new site and the extension to the existing site will be required to comply with the Burry Inlet MOU, which requires the removal of surface water in order to protect water quality in the Burry Inlet.	SP9: Infrastructure CCH4: Water Quality and Protection of Water Resources CCH5: Flood Risk Management and Avoidance PSD3: Green and Blue Infrastructure Networks

		It is noted that the 3 locations listed under SP9 are affected to varying degrees in relation to the Development Advice Map Zone C1.	
ISA6 – Material Assets	+	Both sites are in sustainable locations with good access to facilities and services as well as public transport routes.	
ISA7 - Soil	-	The development of both sites will involve the loss of soils to non-permeable surfaces.	PSD3: Green and Blue Infrastructure Networks SP14: Maintaining and Enhancing the Natural Environment.
ISA8 – Cultural Heritage and Historic Environment	0	The proposed sites have no impact on any sites of archaeological importance, historic landscapes, or listed buildings.	
ISA9 – Landscape	I	The location of the newly proposed site is in close proximity to existing residential and commercial development. Buffer zones of existing green infrastructure should be kept to mitigate any negative impacts on landscape.	SP12: Placemaking and Sustainable Places PSD1: Effective Design Solutions: Sustainability and Placemaking BHE2: Landscape Character
ISA10 – Population	+	This policy promotes the inclusion of Gypsy and Traveller community by allocating land to specifically address their housing need.	
ISA11 – Welsh Language	?	Alignment of this policy with ISA11 is difficult to determine. Growth and inward migration have the potential to dilute Welsh language and culture in certain areas. However, it does increase the potential for retaining young Welsh speakers in the county and so may also have a positive effect. Insufficient data to make prediction.	

ISA12 – Health and Well-being	+	Both sites are located in good proximity to health facilities and services as well as active travel routes and open space provision.
ISA13 – Education and Skills	+	Both sites are located in good proximity to education facilities and services.
ISA14 – Economy	+	Both sites are located in good proximity to existing employment sites.
ISA15 – Social Fabric	+	This policy promotes the inclusion of Gypsy and Traveller community by allocating land to specifically address their housing need.

ISA Comments and Suggestions
- The boundary of the proposed Pen-y-fan site has some scrub habitat which has biodiversity value as well as providing some screening of noise/air pollution from the adjacent railway line. The SA recommends that this is retained as a buffer to the adjoining railway line.   - Existing green Infrastructure corridors should also be maintained as buffer zones to mitigate any negative impacts on landscape.   - It is recommended that the Council give due consideration as to whether SP9 complies with the policy requirements contained in Policy CCH5: Flood Risk Management and Avoidance in relation to flood risk. Such consideration should be further informed by any detailed / project level Flood Consequences Assessments (FCA). An FCA could assist in clarifying the likelihood and severity of flood risk on the 3 locations listed under Strategic Policy 9 to the Council.

SP 11: The Visitor Economy

ISA Objective	Appraisal	Comments	Mitigating Policies
ISA1 – Sustainable Development	I	This policy contributes positively towards maintaining a sustainable economy in the County and promotes health and wellbeing. However, the alignment of this policy with ISA1 is dependent on the choice of sites and manner in which they are developed	See relevant policies below
ISA2 – Biodiversity	I	Any development infers potential for negative impacts on biodiversity, but at a strategic level, it is difficult to determine more specific impacts. The choice of sites and the manner in which they are developed would determine the way in which biodiversity would be affected.	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: Green Infrastructure – Trees, Woodlands and Hedgerows
ISA3 – Air Quality	+/-	Increasing numbers of tourism related visitors to the county will potentially increase access via private car. However, the policy stipulates that tourism related development must be sustainably located, which should ensure that developments are located in areas that are accessible by public transport. It also states that developments should contribute to the protection and enhancement of the natural environment and green infrastructure which, in turn, will have air quality benefits.	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network
ISA4 – Climatic Factors	+/-	Increasing numbers of tourism related visitors to the county will potentially increase access via private car. However, the policy stipulates that tourism related development to be sustainably	CCH3: Electric Vehicle Charging Points TRA2: Active Travel PSD12: Light and Air Pollution

		located will ensure that developments are located in areas that are accessible by public transport.	
ISA5 – Water	I	There is potential for tourism related activities may extend to riverine and coastal environments, which may have repercussions for water quality, however the policy expressly states that developments should not have any significant impact on the natural environment. The choice of sites and the manner in which they are developed would determine the way in which water would be affected.	CCH4: Water Quality and Protection of Water Resources
ISA6 – Material Assets	+	Ensuring tourism related development that reflects the Plan's settlement framework supports the intention to meet needs locally and reduce the need to travel. The policy states that proposals must be sustainably located.	
ISA7 - Soil	I	The alignment of this policy with ISA7 is dependent on the choice of sites and manner in which they are developed	PSD3: Green and Blue Infrastructure Networks SP14: Maintaining and Enhancing the Natural Environment.
ISA8 – Cultural Heritage and Historic Environment	I	The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
ISA9 – Landscape	I	Development has the potential to impact of features of landscape importance however the policy expressly states that developments should exhibit high quality design and placemaking principles. Effects will depend on the implementation of the policy.	SP12: Placemaking and Sustainable Places PSD1: Effective Design Solutions: Sustainability and Placemaking BHE2: Landscape Character

ISA10 – Population	+	Tourism is a key component of Carmarthenshire's economy and a major source of employment. Increasing tourism jobs is likely to contribute to the retention of young people in the county.	
ISA11 – Welsh Language	?	Alignment of this policy with ISA11 is difficult to determine. Economic growth and resulting inward migration have the potential to dilute Welsh language and culture in certain areas. However, it does increase the potential for retaining young Welsh speakers in the county and so may also have a positive effect. Insufficient data to make prediction.	WL1: Welsh Language and New Developments PSD9: Advertisements
ISA12 – Health and Well-being	++	Tourism facilities aligned with corporate policies such as the County's cycling aspirations has the potential to encourage walking/cycling, access to natural and cultural heritage and access to health and recreation facilities.	
ISA13 – Education and Skills	+	Provision for year round tourism related initiatives is likely to result in an increase in employment and associated education, skills and training opportunities.	
ISA14 – Economy	++	This policy looks to facilitate tourism related development, which is a key component of Carmarthenshire's economy and a major source of employment.	
ISA15 – Social Fabric	+	Tourism is a key component of Carmarthenshire's economy and a major source of employment. Increasing tourism jobs is likely to contribute to the retention of young people in the county.	
ISA Comments and Suggestions			
• Any residual negative impacts and remaining uncertainty can be sufficiently mitigated by revised LDP Plan Policies.			

SP 12: Placemaking and Sustainable Places

ISA Objective	Appraisal	Comments	Mitigating Policies
ISA1 – Sustainable Development	++	This policy supports sustainable development and includes regard to Well-being and integration of communities.	
ISA2 – Biodiversity	+	Retention and creation of green infrastructure creates opportunities to protect and enhance biodiversity and ecological connectivity.	
ISA3 – Air Quality	++	Retention and creation of green infrastructure will contribute to the filtering and removal of pollutants from the air. Incorporation of active travel routes and access to public transport into development will also encourage less private car use.	
ISA4 – Climatic Factors	++	Retention and creation of green infrastructure can mitigate effects of climate change by recycling CO_2 and also providing cooling effects and absorption of rain water which can reduce risk of flooding. This policy encourages development to be adaptable to climate change and encourages regard to be had to incorporating SuDS into development where feasible.	
ISA5 – Water	+	Encouraging the incorporation of SUDS into future development as well as retention and creation of green infrastructure aligns positively with ISA5.	
ISA6 – Material Assets	+	This policy encourages new development to have regard for generation, treatment and disposal of waste.	
ISA7 - Soil	+	Retention and creation of green infrastructure aligns positively with the avoidance of loss of soils to non-permeable surfaces	
ISA8 – Cultural Heritage and	+	This policy actively seeks to promote high quality design that reflects local character and distinctiveness.	

Historic Environment		
ISA9 – Landscape	+	This policy actively seeks to promote high quality design in keeping with the surrounding landscape.
ISA10 – Population	+	This policy encourages the creation of safe, attractive and accessible environments which in turn, create attractive spaces for all members of society, including young people and disadvantaged groups.
ISA11 – Welsh Language	+	This policy recognises the need for development (including social infrastructure) to exhibit a clear understanding of local character and distinctiveness which would include the Welsh Language, in addition to landscape context (applicable to the whole County as the Council has previously deemed it as linguistically sensitive).
ISA12 – Health and Well-being	+	This policy encourages new development to have regard for Well-being and, in particular, access to open space and recreation.
ISA13 – Education and Skills	0	
ISA14 – Economy	+	Creation of vibrant, safe and sustainable communities in likely to encourage the retention and inflow of people to Carmarthenshire, which will contribute positively to the economy.
ISA15 – Social Fabric	+	This policy encourages the creation of safe, attractive and accessible environments which in turn, create attractive spaces for all members of society, including young people and disadvantaged groups.
ISA Comments and Recommendations		
• Suggest specific reference is made to net benefits for biodiversity, ecological resilience, energy efficient design as well as resource efficiency.		

- Suggest reference to use of sustainable materials as well as techniques.
- Suggest reference to recycling of waste under criteria (j)
- No negative impacts on ISA Framework are predicted as a result of this policy.

SP 13: Rural Development

ISA Objective	Appraisal	Comments	Mitigating Policies
ISA1 – Sustainable Development	+/-	This policy contributes positively towards maintaining a sustainable economy in the County and promotes health, wellbeing and social inclusion. However, it has several predicted adverse effects (see below) which may be contrary to living within environmental limits.	See relevant policies below
ISA2 – Biodiversity	-	This policy supports increased development in rural areas which is likely to increase development of greenfield land and have a negative impact on currently undisturbed and biodiversity sensitive areas.	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: Green Infrastructure – Trees, Woodlands and Hedgerows
ISA3 – Air Quality	+	Promoting development in rural areas will alleviate pressure on urban areas that are close to or in breach of UK air quality objectives (AQMZs). Retention of facilities and services in rural settlements will also contribute positively by reducing private car use.	

ISA4 – Climatic Factors	+	Retention of facilities and services in rural settlements will also contribute positively by reducing private car use thereby reducing transport related carbon emissions.	
ISA5 – Water	-	Rural development is likely to result in a loss of permeable greenfield land to hard standing, potentially increasing flood risk and surface run off. This policy specifically states that development must consider effects on local infrastructure, which would include water supply and sewerage discharge.	SP14: Maintaining and Enhancing the Natural Environment PSD3: Green and Blue Infrastructure Networks SP9: Infrastructure CCH4: Water Quality and Protection of Water Resources
ISA6 – Material Assets	+	This policy supports the retention of facilities and services in rural settlements and therefore aids in addressing needs locally.	
ISA7 - Soil	-	Rural development is likely to result in a loss of permeable greenfield land to hard standing.	PSD3: Green and Blue Infrastructure Networks SP14: Maintaining and Enhancing the Natural Environment.
ISA8 – Cultural Heritage and Historic Environment	I	The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed.	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
ISA9 – Landscape	-	Rural development is unlikely to result in derelict land being repurposed.	SP12: Placemaking and Sustainable Places PSD1: Effective Design Solutions: Sustainability and Placemaking BHE2: Landscape Character

ISA10 – Population	+	Retention and enhancement of rural facilities, services and employment opportunities is likely to have a positive effect on the retention of young people and inclusion of disadvantaged and minority groups in society.	
ISA11 – Welsh Language	+/-	Alignment of this policy with ISA11 is difficult to determine. Economic growth in rural areas has the potential to dilute Welsh language and culture due to in migration of people, potentially from outside of the County. However, it potentially may led to the retention of young Welsh speakers in the county. Analysis within the WLIA references the 2011 Census which suggested that 45% of in migrant persons came from other parts of Wales with ~33% of households having one adult who spoke Welsh.	WL1: Welsh Language and New Developments
ISA12 – Health and Well-being	+	Rural development would increase access to green spaces and the County's natural and cultural heritage. Retention and enhancement of rural facilities, services will also ensure access to local health and recreation services are likely to be protected.	
ISA13 – Education and Skills	+	This policy facilitates the retention and enhancement of rural facilities and services which is likely to ensure access to rural education facilities are protected.	
ISA14 – Economy	++	This policy seeks to address economic disparity between the north and south of the county, by providing local employment supported by a local workforce in rural area.	

ISA15 – Social Fabric	++	Retention and enhancement of rural facilities, services and employment opportunities is likely to have a positive effect on the retention of young people and inclusion of disadvantaged and minority groups in society.	

ISA Comments and Recommendations

- Any residual negative impacts and remaining uncertainty can be sufficiently mitigated by revised LDP Plan Policies.

SP 14: Maintaining and Enhancement of the Natural Environment

ISA Objective	Appraisal	Comments	Mitigating Policies
ISA1 – Sustainable Development	+		
ISA2 – Biodiversity	++	This policy directly aligns with ISA2 to protect and enhance the natural environment.	
ISA3 – Air Quality	+	Protection and enhancement of the natural environment will contribute to the filtering and removal of pollutants from the air.	
ISA4 – Climatic Factors	+	Protection and enhancement of the natural environment can mitigate effects of climate change by recycling CO_2 and also providing cooling effects and absorption of rain water which can reduce risk of flooding.	
ISA5 – Water	+	This policy includes the protection and enhancement of waterbodies.	
ISA6 – Material Assets	0		
ISA7 - Soil	+	This policy includes the protection and enhancement of soil resources.	
ISA8 – Cultural Heritage and Historic Environment	+	The natural environment is strongly linked with cultural heritage.	

ISA9 – Landscape	+	This policy directly refers to the protection and enhancement of Carmarthenshire's landscape.	
ISA10 – Population	+	Protection of the natural environment can result in Carmarthenshire being a more desirable place to live, which may encourage young people to stay in the County. There are also studies that conclude that natural green space can increase social inclusion.	
ISA11 – Welsh Language	0		
ISA12 – Health and Well-being	+	Protecting and enhancing the County's natural assets will directly support promoting access to Carmarthenshire's natural heritage and open spaces.	
ISA13 – Education and Skills	+	The natural heritage of Carmarthenshire is a valuable resource in the education of children and adults.	
ISA14 – Economy	+	Protection of Carmarthenshire's natural assets preserves the biodiversity and unique natural environment within the County, which enhances the tourism and visitor economy.	
ISA15 – Social Fabric	+	There are also studies that conclude that natural, biodiverse green spaces can increase social inclusion and contribute towards creating settlements that are safer and healthier.	
ISA Comments and Recommendations			
• No negative impacts on ISA Framework are predicted as a result of this policy.			

- Suggested changes to the policy wording to strengthen the requirement to protect and enhance the natural environment; Remove reference to PPW and TAN5 to include 'all National Policy and legislative requirements' to include other applicable laws; use different terminology to align with current focus (i.e., net benefit for biodiversity)
- Specific reference should be made in the supporting text to the Council's Duties under the Environment (Wales) Act 2018.

SP 15: Protection and Enhancement of the Built and Historic Environment.			
ISA Objective	**Appraisal**	**Comments**	**Mitigating Policies**
ISA1 – Sustainable Development	+	Protection of the built and historic environment contributes positively towards sustainable development and well-being objectives.	
ISA2 – Biodiversity	0		
ISA3 – Air Quality	0		
ISA4 – Climatic Factors	0		
ISA5 – Water	0		
ISA6 – Material Assets	0		
ISA7 - Soil	0		
ISA8 – Cultural Heritage and Historic Environment	++	This policy directly supports the protection and enhancement of Carmarthenshire's cultural heritage and high-quality design.	
ISA9 – Landscape	+	This policy directly supports the safeguarding of the County's townscapes and landscapes.	

ISA10 – Population	+	Protection of the historic environment can result in Carmarthenshire being a more desirable place to live, which may encourage young people to stay in the County.	
ISA11 – Welsh Language	+	The built heritage of Carmarthenshire has strong links to Welsh Culture.	
ISA12 – Health and Well-being	+	Protection of the built and historic environment preserves access to cultural heritage for Well-being purposes.	
ISA13 – Education and Skills	+	The built heritage of Carmarthenshire is a valuable resource in the education of children and adults.	
ISA14 – Economy	+	Protection of Carmarthenshire's cultural assets preserves the diversity and rich heritage of the County, which enhances the tourism and visitor economy.	
ISA15 – Social Fabric	+	Ensuring the build and historic environment are protected will ensure accessibility to such resources is as wide as possible, especially to disadvantaged sections of society.	
ISA Comments and Suggestions			

- No negative impacts on ISA Framework are predicted as a result of this policy.
- Although this policy does not directly impact on ISA3 – Air Quality, the policy itself can be affected by air quality. Poor air quality can have impacts the built and historic environment such as increasing the corrosive gases in the atmosphere as well as deposition of particles which can cause discolouration of surfaces. This should be mentioned in the supporting text of this policy to ensure its due consideration in any planning application.
- In line with the Well-being of Future Generations Act, the policy should make reference to the fact that the historic environment is a finite, non-renewable and shared resource and a vital and integral part of the historical and cultural identity of Wales. The historic environment can only be maintained as a resource for future generations if historic assets are protected and restored.

SP 16: Climate Change			
ISA Objective	**Appraisal**	**Comments**	
ISA1 – Sustainable Development	++	Policy supports climate resilience in future development and will contribute to reducing Carmarthenshire's carbon footprint.	
ISA2 – Biodiversity	+	Encouraging sustainable transport will in turn have positive effects on air quality, which currently impacts on certain designated sites in the County.	
ISA3 – Air Quality	+	Encouraging sustainable transport will in turn have positive effects on air quality by reducing car related emissions.	
ISA4 – Climatic Factors	++	This policy supports the reduction of carbon emissions as well as future proofing new development to the risks of flooding, including reference to TAN 15. It also encourages all new development to be energy efficient and to incorporate climate resilient design.	
ISA5 – Water	+	Encouraging the incorporation of SUDS into future development as well as flood resilient design align positively with ISA5.	
ISA6 – Material Assets	+	This policy ensures the consideration of sustainable transport in new development.	
ISA7 - Soil	0		
ISA8 – Cultural Heritage and Historic Environment	0		

ISA9 – Landscape	0		
ISA10 – Population	?	Climate resilient developments have the potential, by extension, to promote the continuation (and development) of sustainable communities – leading to the retention of young people .	
ISA11 – Welsh Language	0		
ISA12 – Health and Well-being	+	Minimising the need to travel supports active travel.	
ISA13 – Education and Skills	?	Has the potential to foster the development of skills associated with delivering innovative, climate responsive design.	
ISA14 – Economy	?	Indirectly promotes green jobs and sustainable businesses.	
ISA15 – Social Fabric	?	Climate responsive design has the potential to improve safety and security for people and property.	
ISA Comments and Suggestions			

- A stronger statement needs to be made to a commitment to reduce carbon emissions in policy.
- Specific reference should be made to the motion on climate change that was passed by Council in Feb 2019 that resulted in a climate emergency being declared by Carmarthenshire County Council. The LDP should make reference somewhere in the deposit plan as to how the LDP seeks to address this climate emergency.
- The policy does not mention the benefits of Green Infrastructure to mitigating and increasing resilience to the effects of climate change, in particular as carbon sinks. Reference to green infrastructure would result in a change from no effect to positive effects on ISA7 – Soil. The SA recommends that specific reference should be made to the multifunctional benefits of green infrastructure for climate change resilience and mitigation in this policy.

SP 17: Transport and Accessibility			
ISA Objective	**Appraisal**	**Comments**	**Mitigating Policies**
ISA1 – Sustainable Development	++	This policy underpins the ability to deliver develop sustainably, by reducing private car use and ensuring access to services and facilities.	
ISA2 – Biodiversity	+	Reduced private car use will decrease related air pollutants that have negative effects on European designated sites in some areas of Carmarthenshire.	
ISA3 – Air Quality	++	This policy will contribute to the delivery of a sustainable travel network which will have strong positive effects on improving air quality.	
ISA4 – Climatic Factors	+	This policy will contribute to the delivery of a sustainable travel network which will reduce private car use and associated greenhouse gas emissions.	
ISA5 – Water	0		
ISA6 – Material Assets	++	This policy will contribute to the delivery of a sustainable travel network including active travel such as walking and cycling as well as electric car use.	
ISA7 - Soil	0		
ISA8 – Cultural Heritage and Historic Environment	0		

ISA9 – Landscape	0		
ISA10 – Population	+	This policy looks to address social inclusion through increased accessibility to employment, services and facilities	
ISA11 – Welsh Language	0		
ISA12 – Health and Well-being	+	This policy looks to increase accessibility to services and facilities including health and leisure facilities and also looks to enhance access to active travel routes.	
ISA13 – Education and Skills	+	This policy looks to increased accessibility to services and facilities including education and skills facilities.	
ISA14 – Economy	0		
ISA15 – Social Fabric	+	This policy looks to address social inclusion through increased accessibility to employment, services and facilities	
ISA Comments and Suggestions			
• No negative impacts on ISA Framework are predicted as a result of this policy. • Suggest reference be made in the supporting text to development in rural locations being preferably sited within and adjoining settlements that benefit from key services and facilities, rather than at sporadic countryside locations.			

SP 18: Mineral Resources

ISA Objective	Appraisal	Comments	Mitigating Policies
ISA1 – Sustainable Development	I	The alignment of this policy with ISA1 is dependent on the choice of sites and manner in which they are developed.	
ISA2 – Biodiversity	-	The location of aggregates is driven by site specific geological conditions and so has less flexibility to avoid impacts on sensitive ecological features. Mineral workings are also likely to be situated in undeveloped areas/greenfield land.	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: Green Infrastructure – Trees, Woodlands and Hedgerows
ISA3 – Air Quality	-	The location of aggregates is driven by site specific geological conditions and so reducing distances required to transport goods will be difficult.	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network
ISA4 – Climatic Factors	-	The location of aggregates is driven by site specific geological conditions and so reducing distances required to transport goods will be difficult.	
ISA5 – Water	-	Whilst the alignment of this policy with ISA5 is dependent on the choice of sites and manner in which they are developed, impact upon groundwater resources cannot be completely avoided.	
ISA6 – Material Assets	0	This policy safeguards aggregate reserves to ensure their future availability. However, the extraction of mineral resources must be balanced with the use of	

		recycled and secondary materials. However, the policy specifically makes reference to maximising the potential for the re-use and recycling of suitable minerals as an alternative to primary won aggregates.	
ISA7 - Soil	-	The location of aggregates is driven by site specific geological conditions and so has less flexibility to avoid impacts on specific soil resources.	SP14: Maintaining and Enhancing the Natural Environment
ISA8 – Cultural Heritage and Historic Environment	I	The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed.	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
ISA9 – Landscape	-	The location of aggregates is driven by site specific geological conditions and so has less flexibility to avoid impacts on sensitive landscape areas. Mineral workings are also likely to be situated in undeveloped areas.	MR1: Mineral Proposals
ISA10 – Population	0		
ISA11 – Welsh Language	0		
ISA12 – Health and Well-being	-	Whilst the alignment of this policy with ISA12 is dependent on the choice of sites and manner in which they are developed, impacts upon human health and wellbeing will (in varying degrees) occur. Development	

	(red cell)	may restrict access to Wales' natural and cultural heritage impacting upon well-being, and pollutants through several pathways (noise, air, and water) may impact human health.	
ISA13 – Education and Skills	0		
ISA14 – Economy	+	Extraction of aggregates supports development and economic growth.	
ISA15 – Social Fabric	0		
ISA Comments and Suggestions			

- To provide further mitigation of this policy against ISA4 Climatic Factors, reference should be made in the policy to ensuring that where possible, mineral extraction utilise transport links such as rail/or water transport as opposed to road haulage.
- Suggest adding a clear statement clarifying that the Council will not support the development of land-based coal or unconventional oil or gas operations, including the exploration, appraisal and extraction of oil and gas by unconventional methods (including the making of exploratory boreholes), unless the applicant can demonstrate the proposal conforms with national planning policy.
- Clarify that petroleum refers to any mineral oil or relative hydrocarbon and natural gas existing in its natural strata as defined in the Petroleum Act 1998. This therefore includes shale oil and gas and coal bed methane. The definition of coal is taken from the Coal Industry Act 1994. This covers coal and underground coal gasification.
- To mitigate for residual impacts on ISA7 – Soil, wording should be added to supporting text that makes clear that any soil removed as a result of the extraction process must be retained and replaced in situ.
- Although specific policy MR1 Mineral Proposals goes some way to mitigating any residual negative impacts on ISA9 – Landscape, it is suggested that additional wording on the protection of Landscape character and visual amenity in this policy to reinforce its importance.

SP 19: Waste Management			
ISA Objective	**Appraisal**	**Comments**	**Mitigating Policies**
ISA1 – Sustainable Development	I	The alignment of this policy with ISA1 is dependent on the choice of sites and manner in which they are developed.	
ISA2 – Biodiversity	-	Development or disposal from waste may adversely impact natural habitats. However, the policy does make reference to ensuring no significant adverse effects on the environment.	SP14: Maintaining and Enhancing the Natural EnvironmentSP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: Green Infrastructure – Trees, Woodlands and Hedgerows
ISA3 – Air Quality	I	Energy from Waste (EfW) sites are tightly regulated with respect to pollutants such as SO_2, NO_x, HCl and CO. Effects ultimately depend on the type and location of waste management facilities.	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network WM1 Sustainable Waste Management and New Development
ISA4 – Climatic Factors	I	Energy from Waste (EfW) sites are tightly regulated with respect to pollutants such as SO_2, NO_x, HCl and CO. Effects ultimately depend on the type and location of waste management facilities. The policy does make reference to the potential for co-locating waste management facilities to create heat networks.	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network WM1 Sustainable Waste Management and New Development

ISA5 – Water	I	The alignment of this policy with ISA5 is dependent on the choice of sites and manner in which they are developed.	
ISA6 – Material Assets	+	This policy directly refers to the waste hierarchy and the promotion of recycling and minimising waste.	
ISA7 - Soil	-	Waste disposal including landfill and disposal of ash from EfW sites may adversely affect soil resources.	SP14: Maintaining and Enhancing the Natural Environment
ISA8 – Cultural Heritage and Historic Environment	I	The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed.	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
ISA9 – Landscape	I	The policy makes direct reference to any proposal having no significant adverse effect on local amenity	SP12: Placemaking and Sustainable Places PSD1: Effective Design Solutions: Sustainability and Placemaking BHE2: Landscape Character
ISA10 – Population	0		
ISA11 – Welsh Language	0		
ISA12 – Health and Well-being	0	The policy makes specific reference to any development having to ensure that there are no significant, adverse effect on public health.	

ISA13 – Education and Skills	0		
ISA14 – Economy	+	New waste management sites generate jobs and local, long term employment opportunities.	
ISA15 – Social Fabric	0		
ISA Comments and Suggestions			

- Policy should include a criterion stating that no significant impacts in the environment should occur because of waste management proposals.
- Suggest more in the supporting text regarding sustainable location of waste management facilities especially when situated outside of development limits.
- To further strengthen mitigation against potential negative effects on ISA9 – Landscape, reference should be made to design of buildings being in keeping with surrounding landscape.
- Include reference to the proximity principle to minimise distance between where waste is generated and managed.
- Suggest including some wording around the importance of green infrastructure for visual, noise and air pollution screening.

Appendix G

ISA Specific Policies

Appendix G: ISA Specific Policies

This document contains the appraisal of 78 specific policies (and associated ISA commentary) contained with the rLDP (split over 18 strategy policies, note that SP6 does not contain any specific policies and is, therefore, not included below). It should be read in conduction with Chapter 6.6 of the ISA report. A summary of the results of the appraisal against the ISA Framework are presented in Table 20 of the ISA report. Where relevant, the commentary has been expanded upon for those policies which have undergone minor change since their previous assessment in the SA Report (2020), however, new commentary has been provided for those new specific policies, those which have major changing in context/wording, and those which have been scored differently considering an updated scope and/or baseline.

The table below contains the assessment criteria for draft policies and reasonable alternatives, as adapted from Welsh Government Development Plans Manual Edition 3 (2020).

Symbol	Predicted Effect	Suggested action/response
++	Very positive effect – the subject of the appraisal would significantly help in achieving the Sustainability objective.	Consider whether very positive effect can be further enhanced
+	Positive effect - the subject of the appraisal would help in achieving the Sustainability objective.	Consider whether positive effect can be further enhanced
+/-	Positive and negative effects – the subject of the appraisal would help some elements of the Sustainability objective whilst hindering others.	Consider mitigation for negative effects and whether positive effects can be enhanced
-	Negative effect - the subject of the appraisal would conflict with the Sustainability objective.	Consider mitigation such as delete/reconsider/amend the policy or site allocation; reconsider the policy or proposed use.
--	Very negative effect - the subject of the appraisal would be in significant conflict with the Sustainability objective.	Significant mitigation measures to reduce severity or effect; reconsider the policy or proposed use
I	Effect on the Sustainability objective depends on how the policy and allocation are implemented	Suggestions for implementation
0	Neutral effect compared to the current situation	Consider whether intervention could bring positive effects
?	Uncertain effect – more information needed	Consider where this will come from – who has it? What will be done about collecting it? When will it be collected?

SP1 Strategic Growth				
Specific Policies	SG1: Regeneration and Mixed-Use Sites SG2: Reserve Sites SG3: Pembrey Peninsula			
ISA Objective	**SG1**	**SG2**	**SG3**	**Mitigating Policies**
ISA1 – Sustainable Development	I	I	I	**See relevant policies below**
ISA2 – Biodiversity	-	-	-	**SP12: Placemaking and Sustainable Places** **SP14: Maintaining and Enhancing the Natural Environment** **NE1: Regional and Local Designations** **NE2: Biodiversity** **NE3: Corridors, Networks, and Features Of Distinctiveness** **PSD3: Green and Blue Infrastructure Network** **PSD4: GBI – Trees, Woodlands, and Hedgerows**
ISA3 – Air Quality	-	-	-	**PSD3: Green and Blue Infrastructure Network** **PSD12: Light and Air Pollution**
ISA4 – Climatic Factors	I	I	-	**SP12: Placemaking and Sustainable Places** **CCH3: Electric Vehicle Charging Points**

				CCH5: Flood Risk Management and Avoidance **TRA2: Active Travel**
ISA5 – Water	I	I	-	**SP 9: Infrastructure** **SP 12: Placemaking and Sustainable Places** **CCH4: Water Quality and the Protection of Water Resources** **CCH5: Flood Risk Management and Avoidance** **INF5: Rural Allocations outside Public Sewerage System** **Catchments (SG3)**
ISA6 – Material Assets	+	I	+	
ISA7 – Soil	+/-	I	+/-	**PSD3: GBI Networks** **SP14: Maintaining and Enhancing the Natural Environment** **PSD1: Effective Design Solutions: Sustainability and Placemaking**
ISA8 – Cultural Heritage	I	I	I	**SP15: Protection and Enhancement of the Built and Historic Environment** **BHE1: Listed Buildings and Conservation Areas** **BHE2: Landscape Character** **NE1: Regional and Local Designations** **SP 12: Placemaking and Sustainable Places** **PSD1: Effective Design Solutions: Sustainability and Placemaking** **PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods.**

ISA9 – Landscape	I	I	I	**SP12: Placemaking and Sustainable Places** **SP 14: Maintaining and Enhancing the Natural Environment** **SP 15: Protection and Enhancement of the Built and Historic Environment** **BHE1: Listed Buildings and Conservation Areas** **BHE2: Landscape Character** **PSD11: Noise Pollution** **PSD12: Light and Air Pollution** **NE1: Regional and Local Designations**
ISA10 – Population	++	+	++	
ISA11 – Welsh Language	+/-	+/-	+/-	**SP 8: Welsh Language and Culture** **WL1: Welsh Language and New Developments** **PSD9: Advertisements**
ISA12 – Health and Well-being	+	I	+	
ISA13 – Education and Skills	+	I	+	
ISA14 – Economy	++	++	++	

ISA15 – Social Fabric	+	I	+	

Commentary

These three policies individually look to support a sustainable economy and provides opportunity for needs to be met locally (ISA1), and mixed-use employment sites will provide employment/business opportunities (ISA14). All development is likely to increase localised pollution (air, water, or land (soil contamination) and will, therefore, needs to be appropriately addressed in accordance with the mitigation hierarchy (avoid, minimise, mitigate and/or compensate).

SG1 – This appraisal considered the likely impacts from the provision of all mixed-use allocations outlined within the policy. Several sites outlined contain respect to existing nearby infrastructure (e.g., PrC1/MU2, PrC1/MU3) (ISA6/12/13/15), and few use brownfield land which conserves soil resource (ISA7). Nevertheless, all sites will be assessed separately in more detail within section 6.8 of the ISA Report. The use of development briefs will allow for more in detail considerations of any constraints and opportunities for enhancements, in particular the consideration and incorporation of GBI and biodiversity assets on the site. Flooding risk is increasing within Wales and while a limited number of sites contained within SG1 are currently located within a flood risk zone (as identified in the TAN 15 Development Advice Maps), it is important an adaptive response is considered on a site basis to avoid a conflict within increasing climate resilience (4-3) ISA4. Therefore, at an overall strategic level, the likely effect on ISA4 and ISA5 depends on how allocations are implemented.

SG2 – Specific reference in the policy to accordance with policies on high quality design, GBI and active travel routes are welcomed. To further mitigate any negative impacts on ISA2 – Biodiversity, suggest specific reference is made to policy SP14: Maintaining and Enhancing the Natural Environment. Development would have to comply with TAN15 and policy CCH5: Flood Risk Management and Avoidance which would minimise the risks associated with flooding, in particular for sites that are located in coastal areas. The policy looks to utilise previously developed sites which is positive against ISA7 – Soil and ISA9 Landscape. Increasing employment provision across the county can help retain young people which in turn will have a positive effect on ISA11 – Welsh Language. However, Growth and inward migration have the potential to dilute Welsh language and culture in certain areas.

SG3 – Pembrey is currently a blue flag beach, but appropriate mechanisms would need to be put in place to minimise litter and maximise recycling to protect water quality. The peninsula is also surrounded by C2 flood zone including the ingress and egress to the site. The Council would need to be satisfied that any development considered vulnerable satisfied he conditions under TAN15. The peninsula is also an area of high biodiversity and cultural value and any proposals would need to take careful consideration of this in any application. Development would need to be sensitive and in keeping with the natural and unique surroundings to reduce any potential impacts on ISA9 Landscape.

ISA Comments & Recommendations

SG1 – Ensure sites are assessed accordingly, with reference of the likely adverse impacts as identified on a strategic level.
SG2 – Suggest specific reference is made to policy SP14: Maintaining and Enhancing the Natural Environment
SG3 – Suggest additionally wording is added to supporting text regarding the cultural and biodiversity importance of Pembrey (explicitly stating mitigating policies). The accompanying SPG would need to be explicit about design and landscaping as well as cultural heritage and biodiversity to ensure any negative impacts on the landscape were minimised.

SP2: Retail and Town Centres			
Specific Policies	RTC1: Protection of Local Shops and Facilities RTC2: Retail in Rural Areas		
ISA Objective	**RTC1**	**RTC2**	**Mitigating Policies**
ISA1 – Sustainable Development	+	I	**See relevant policies below (ISA2/7)**
ISA2 – Biodiversity	0	-	**SP12: Placemaking and Sustainable Places** **SP14: Maintaining and Enhancing the Natural Environment** **NE1: Regional and Local Designations** **NE2: Biodiversity** **NE3: Corridors, Networks, and Features Of Distinctiveness** **PSD3: Green and Blue Infrastructure Network** **PSD4: GBI – Trees, Woodlands, and Hedgerows**
ISA3 – Air Quality	+/-	+	**PSD12: Light and Air Pollution**

			PSD3: Green and Blue Infrastructure Network
ISA4 – Climatic Factors	**+/-**	**+**	**SP12: Placemaking and Sustainable Places** **CCH3: Electric Vehicle Charging Points** **CCH5: Flood Risk Management and Avoidance** **TRA2: Active Travel**
ISA5 – Water	**0**	**I**	**SP 12: Placemaking and Sustainable Places** **CCH4: Water Quality and the Protection of Water Resources** **CCH5: Flood Risk Management and Avoidance** **INF5: Rural Allocations outside Public Sewerage System** **Catchments (RTC3)**
ISA6 – Material Assets	**+**	**+**	
ISA7 – Soil	**+**	**-**	**PSD3: GBI Networks** **SP14: Maintaining and Enhancing the Natural Environment** **PSD1: Effective Design Solutions: Sustainability and Placemaking**
ISA8 – Cultural Heritage	**+**	**0**	
ISA9 – Landscape	**+**	**I**	**SP12: Placemaking and Sustainable Places** **SP 14: Maintaining and Enhancing the Natural** **Environment**

			SP 15: Protection and Enhancement of the Built and Historic Environment **BHE1: Listed Buildings and Conservation Areas** **BHE2: Landscape Character** **PSD11: Noise Pollution** **PSD12: Light and Air Pollution** **NE1: Regional and Local Designations**
ISA10 – Population	**+**	**+**	
ISA11 – Welsh Language	**+**	**+**	
ISA12 – Health and Well-being	**+**	**+**	
ISA13 – Education and Skills	**+**	**+**	
ISA14 – Economy	**++**	**+**	
ISA15 – Social Fabric	**+**	**+**	
Commentary			
These two policies individually look to support a sustainable economy and provides opportunity for needs to be met locally (ISA1), and support employment/business opportunities (ISA14).			

RTC1 – Protect local shops and facilities which will help to ensure that needs can be met locally without the use of the private cars. This will have positive impacts on ISA3 Air quality, ISA4 Climatic Factors and ISA6 Material Assets. This policy also scores positive against the socio-economic ISA Objectives as retention of facilities and services will promote the retention of young people by providing jobs and access to skills development. Both the primary and secondary town centre retail areas within Carmarthen is a AQMA. Increasing retail provision within this area may result in an increase in deliveries and heavy goods vehicles to this area which will have negative air quality impacts. Resulting increases in CO2 emissions should also be considered. However, Carmarthen Town Centre is well serviced by public transport which allows the opportunity to reduce air pollution and carbon emissions associated with private car use. Improving retail provision in town centres is likely to encourage needs to be met locally by retaining vital retail provision, which will also have economic and education and skills benefits.

RTC2 – providing services and facilities in rural areas can reduce private car use and in turn improve air quality and associated carbon emissions. Rural development is likely to result in development of greenfield land which can have high biodiversity and /or soil value. However, this can be suitably mitigated by compliance with policy SP14: Maintaining and Enhancing the Natural Environment and associated specific policies**.** To ensure ISA1 is achieved, mitigation associated with ISA2 and ISA7 must be ensured.

ISA Comments & Recommendations

RTC2 – Acknowledgement in the policy that primary and secondary town centre retail areas may be within a AQMA and that retail applications would be subject to submission of an Air Quality Assessment as per policy PSD12 Light and Air Quality.

All – policies should signpost to their potential requirement to fulfil WL1 and promote the use of the WL through PSD9.

SP3: Sustainable Distribution – Settlement Framework		
Specific Policies	**SD1: Development Limits**	
ISA Objective	**SD1**	**Mitigating Policies**
ISA1 – Sustainable Development	I	See all relevant policies below.
ISA2 – Biodiversity	+/-	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: Green and Blue Infrastructure – Trees, Woodlands and Hedgerows
ISA3 – Air Quality	+/-	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network
ISA4 – Climatic Factors	+	
ISA5 – Water	I	SP 12: Placemaking and Sustainable Places CCH4: Water Quality and the Protection of Water Resources

		CCH5: Flood Risk Management and Avoidance **INF5: Rural Allocations outside Public Sewerage System** **Catchments**
ISA6 – Material Assets	**+**	
ISA7 – Soil	**+/-**	**PSD3: Green and Blue Infrastructure Networks** **SP14: Maintaining and Enhancing the Natural Environment.**
ISA8 – Cultural Heritage	**I**	**SP15: Protection and Enhancement of the Built and Historic Environment** **PSD1: Effective Design Solutions: Sustainability and Placemaking** **PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods**
ISA9 – Landscape	**I**	**SP12: Placemaking and Sustainable Places** **PSD1: Effective Design Solutions: Sustainability and Placemaking** **BHE2: Landscape Character**
ISA10 – Population	**+**	
ISA11 – Welsh Language	**?**	**SP 8: Welsh Language and Culture** **WL1: Welsh Language and New Developments** **PSD9: Advertisements**
ISA12 – Health and Well-being	**+**	

ISA13 – Education and Skills	+	
ISA14 – Economy	++	
ISA15 – Social Fabric	++	

Commentary
Any development infers potential for negative impacts on biodiversity, however the use of development limits will prevent inappropriate development in the countryside which will protect undisturbed, greenfield land from development. This is also true of impacts on Soil. Policy SP14: Maintaining and Enhancing the Natural Environment, as well as policies NE1: Regional and Local Designations, NE2: Biodiversity, NE3 Corridors, networks and features of distinctiveness, PSD3: Green and Blue Infrastructure Network, PSD4: Green and Blue Infrastructure – Trees, Woodlands and Hedgerows all provide mitigation for any residual negative impacts of development on ISA2 - Biodiversity and ISA7 Soil.

Directing growth to sustainable locations with sufficient access to facilities, services and public transport links is likely to reduce private car use and associated air pollution. However, Principal Centres such as Llanelli and Carmarthen have existing air quality issues such as AQMA's and increasing growth in these areas may result in a further detriment to air quality. Policies PSD12: Light and Air Pollution and PSD3 GBI can mitigate for these potential impacts.

Any potential for negative impacts on ISA8 or ISA9 in the implementation of this policy can be mitigated by policies SP15: Protection and Enhancement of the Built and Historic Environment, PSD1 Placemaking and Sustainable Places, PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods, SP12: Placemaking and Sustainable Places and BHE2: Landscape Character.

To conserve water resources, development limits should have regard to water supply, sewage connection, and/or feasibility of expanding existing networks with sufficient nutrient headroom at the WwTw servicing that area (in collaboration with DCWW).

This policy aligns directly with ISA15 and has some regard to the Council's Socio-Economic Duty, encouraging the provision of homes in rural areas to ensure the long-term viability of rural communities. Alignment to ISA11 is difficult to determine due to insufficient data available that is based upon the impact of developments limits upon language/culture.

ISA Comments & Recommendations

Ensure mitigating policies cover all potential scenarios that may be developed within each tier to avoid circumstances which will likely lead to adverse environmental effects.

SP4: A Sustainable Approach to Providing New Homes									
Specific Policies	**HOM1: Housing Allocations** **HOM2: Housing within Development Limits** **HOM3: Homes in Rural Village** **HOM4: Homes in Non-Defined Rural Settlements** **HOM5: Conversion or Subdivision of Existing Dwellings** **HOM6: Specialist Housing** **HOM7: Renovation of Derelict or Abandoned Dwellings** **HOM8: Residential Caravans** **HOM9: Ancillary Residential Development**								
ISA Objective	**HOM1**	**HOM2**	**HOM3**	**HOM4**	**HOM5**	**HOM6**	**HOM7**	**HOM8**	**HOM9**	**Mitigating Policies**
ISA1 – Sustainable Development	I	I	I	I	I	I	I	I	I	**See relevant policies below**
ISA2 – Biodiversity	**+/-**	**+/-**	**-**	**-**	I	I	**-**	I	I	**SP12: Placemaking and Sustainable Places** **SP14: Maintaining and Enhancing the Natural Environment** **NE1: Regional and Local Designations** **NE2: Biodiversity** **NE3: Corridors, Networks, and Features Of Distinctiveness**

										PSD3: Green and Blue Infrastructure Network PSD4: GBI – Trees, Woodlands, and Hedgerows
ISA3 – Air Quality	-	I	+	+	-	0	-	0	0	PSD3: Green and Blue Infrastructure Network PSD12: Light and Air Pollution
ISA4 – Climatic Factors	I	I	I	I	I	0	I	0	I	SP12: Placemaking and Sustainable Places CCH3: Electric Vehicle Charging Points CCH5: Flood Risk Management and Avoidance TRA2: Active Travel
ISA5 – Water	I	I	I	I	I	I	I	I	I	SP 9: Infrastructure SP 12: Placemaking and Sustainable Places CCH4: Water Quality and the Protection of Water Resources CCH5: Flood Risk Management and Avoidance INF5: Rural Allocations outside Public Sewerage System Catchments (SG3)

ISA6 – Material Assets	I	+	+	+	-	+	+/-	I	-	SP 9: Infrastructure SP12: Placemaking and Sustainable Places CCH3: Electric Vehicle Charging Points TRA2: Active Travel
ISA7 – Soil	I	I	I	I	0	0	+	I	0	PSD3: GBI Networks SP14: Maintaining and Enhancing the Natural Environment PSD1: Effective Design Solutions: Sustainability and Placemaking
ISA8 – Cultural Heritage	I	I	I	I	I	I	+	0	0	SP15: Protection and Enhancement of the Built and Historic Environment BHE1: Listed Buildings and Conservation Areas BHE2: Landscape Character NE1: Regional and Local Designations SP 12: Placemaking and Sustainable Places PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods.

ISA9 – Landscape	+/-	I	I	I	+/-	I	+	I	I	SP12: Placemaking and Sustainable Places SP 14: Maintaining and Enhancing the Natural Environment SP 15: Protection and Enhancement of the Built and Historic Environment BHE1: Listed Buildings and Conservation Areas BHE2: Landscape Character PSD11: Noise Pollution PSD12: Light and Air Pollution NE1: Regional and Local Designations
ISA10 – Population	+	+	+	+	+	+	+	+	+	
ISA11 – Welsh Language	+	+	+	+	?	+	?	?	?	SP 8: Welsh Language and Culture WL1: Welsh Language and New Developments PSD9: Advertisements
ISA12 – Health and Well-being	+	+	+	+	0	+	0	0	+	

ISA13 – Education and Skills	+	+	+	+	0	0	0	0	0	
ISA14 – Economy	++	+	+	+	0	+	0	+	0	
ISA15 – Social Fabric	+	+	+	+	+	+	+	0	+	

Commentary

These policies look to support a sustainable economy by providing opportunities for needs to be met locally (ISA1). However, as a matter of principle, all development is likely to increase localised pollution (air, water, or land (soil contamination) and will need to be appropriately addressed in accordance with the mitigation hierarchy (avoid, minimise, mitigate/compensate). Consequently, this conflicts with 1-1 of ISA1 and, therefore, the effect is predicted to be dependent on the implementation of policy/allocations. Additionally, affordable housing within these policies and specialist housing is likely to have a positive effect by (1-4) removing barriers and promoting opportunities for behavioural change. Flooding risk is increasing within Wales and while a limited number of the sites contained within HOM1 are currently located within a flood risk zone (as identified in the TAN 15 Development Advice Maps), it is important an adaptive response is considered on a site basis to avoid negative conflict within increasing climate resilience (4-3) ISA4. Therefore, at an overall strategic level, the likely effect on ISA4 and ISA5 depends on how allocations are implemented.

HOM1 – This appraisal considered the likely impacts from the provision of all allocations outlined within the policy. Nevertheless, all sites will be assessed separately in more detail within section 6.8 of the ISA Report. The use of development briefs will allow for more in detail considerations of any constraints and opportunities for enhancements, in particular the consideration and incorporation of GBI and biodiversity assets on the site.

HOM2 – Development limits are likely to avoid damage to biodiversity within rural areas but additional may place pressure of urban biodiversity.

HOM3/HOM4 - These policies encourage small scale development within rural villages and settlements. This is likely to encourage the retention of services and facilities in rural areas, and as such should reduce private car use and associated air quality impacts. Small scale development within settlements can reduce the likelihood of development of greenfield land however it must be ensured that sufficient infrastructure is available to support growth in rural villages. Controlled growth in such areas will help to keep rural communities together and will in turn encourage the retention of young people, protection of the Welsh language and facilitate rural economy.

HOM5 - Converting buildings into multiple occupancy may result in an increased concentration of cars to an area. This may have implications for air quality and carbon emissions, particularly within urban areas (including AQMAs). Connection to active travel routes and public transport should be maximised and the policy should ensure provision is made for the storage of bicycles. The policy makes reference to ensuring quality, character and appearance of the building is safeguarded, however further the policy should make more reference to the use of the building once built and ensuring effective provision of storage, for

rubbish and recycling and for bicycles. Water supply and sewerage supply will be subject to consultation with Dŵr Cymru which should not result in any negative impacts.

HOM6 – By providing specialist housing this policy seeks to provide a framework for considering proposals to make appropriate allowances for the needs of those requiring care. This will have positive impacts on ISA10 population, ISA12 Health and Wellbeing and ISA15 Social fabric as the policy is ensuring that the needs of Carmarthenshire's aging or vulnerable population are met.

HOM7 – Renovation of derelict buildings outside of settlement limits may result in unsustainable location of development, with insufficient access to facilities, services, public transport or active travel routes. This is likely to result in increased private car use and as a result degrading air quality and increasing carbon emissions. Derelict buildings will often contain Bats or other biodiversity and their redevelopment should ensure full compliance with policy SP14: Maintaining and Enhancing the Natural Environment and NE2: Biodiversity, however the policy wording could be strengthened to further mitigate these impacts. Development outside settlement limits is less likely to be in proximity to supporting infrastructure and the use of less sustainable solutions such as septic tanks may be required in place of connection to the existing sewer network. Nevertheless, this kind of development will likely have positive effects upon ISA7, and potentially reduce the use of finite resources and the emission greenhouse gases compared with an entirely new development.

HOM8 – Care should be taken to ensure no negative effects on the landscape as a result of residential caravans, in addition to water pollution from wastewater/sewage disposal.

HOM9 – Existing rural buildings of a certain age may contain protected species which would need to be investigated through an ecological survey as part of any planning application. Any potential for negative effects is mitigated through compliance with policy SP14: Maintaining and Enhancing the Natural Environment and policy NE2: Biodiversity, however the policy wording could be strengthened to further mitigate these impacts.

HOM5/7/8/9 – unknown effect upon the WL. These kinds of development may support the retention of people within the County, however the likely effect of this is difficult to predict.

ISA Comments & Recommendations

HOM1/2/3/4 – specific reference should be made to ensure the regeneration of contaminated land / brown field sites.

HOM5 – specific reference should be made to ensuring provision of secure cycle parking and access to active travel routes particularly within urban areas where air quality issues exist. This policy should require the incorporation of adequate and effective provision for the storage, recycling, and other sustainable management of waste.

HOM5 – This policy should consider flooding risk existing dwellings and development. For those which are likely to flood, conversion/subdivision aimed at expanding occupancy is likely to put others at risk of flooding within applicable areas. To overcome this is should stiplulate that developments must be climate/flood relisent and, potentially, increase the relisence of the existing dwelling.

HOM7 – the policy should be explicit about ensuring any application for development of abandoned buildings outline how the location has access to facilities and services or is accessible by public transport/active travel. Add in text around protected species such as: Traditional rural buildings can provide important habitats for valuable species including bats and barn owls. Proposals for the conversion of such buildings will need to ensure there would be no significant adverse effects on protected species in-line with Policy NE2: Biodiversity and the Nature Conservation and Biodiversity SPG.

SP5: Affordable Homes Strategy			
Specific Policies	AHOM1: Provision of Affordable Homes AHOM2: Affordable Homes – Exceptions sites		
ISA Objective	**AHOM1**	**AHOM2**	**Mitigating Policies**
ISA1 – Sustainable Development	I	I	**See relevant policies below**
ISA2 – Biodiversity	-	-	**SP12: Placemaking and Sustainable Places** **SP14: Maintaining and Enhancing the Natural Environment** **NE1: Regional and Local Designations** **NE2: Biodiversity** **NE3: Corridors, Networks, and Features Of Distinctiveness** **PSD3: Green and Blue Infrastructure Network** **PSD4: GBI – Trees, Woodlands, and Hedgerows**
ISA3 – Air Quality	I	I	**PSD12: Light and Air Pollution** **PSD3: Green and Blue Infrastructure Network**
ISA4 – Climatic Factors	I	I	**SP12: Placemaking and Sustainable Places** **CCH3: Electric Vehicle Charging Points** **CCH5: Flood Risk Management and Avoidance**

			TRA2: Active Travel
ISA5 – Water	I	I	**SP 9: Infrastructure** **SP 12: Placemaking and Sustainable Places** **CCH4: Water Quality and the Protection of Water Resources** **CCH5: Flood Risk Management and Avoidance** **INF5: Rural Allocations outside Public Sewerage System** **Catchments (SG3)**
ISA6 – Material Assets	0	0	
ISA7 – Soil	I	-	**PSD3: GBI Networks** **SP14: Maintaining and Enhancing the Natural Environment** **PSD1: Effective Design Solutions: Sustainability and Placemaking**
ISA8 – Cultural Heritage	I	I	**SP15: Protection and Enhancement of the Built and Historic Environment** **BHE1: Listed Buildings and Conservation Areas** **BHE2: Landscape Character** **NE1: Regional and Local Designations** **SP 12: Placemaking and Sustainable Places** **PSD1: Effective Design Solutions: Sustainability and Placemaking** **PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods.**
ISA9 – Landscape	I	I	**SP12: Placemaking and Sustainable Places**

			BHE2: Landscape Character PSD11: Noise Pollution
ISA10 – Population	**++**	**++**	
ISA11 – Welsh Language	**+**	**+**	
ISA12 – Health and Well-being	**I**	**I**	
ISA13 – Education and Skills	**I**	**I**	
ISA14 – Economy	**+**	**+**	
ISA15 – Social Fabric	**++**	**++**	
Commentary			

The provision of affordable housing will help to ensure that housing is more accessible to those who cannot afford market housing. This is likely to benefit young people and help to retain them in the county, which in turn will help to protect the Welsh Language.

The alignment of these two policies with ISA3/4/5/7/8/9/12/13) is dependent on the choice of sites and manner in which they are developed. With regard to ISA15, these policies effect the design of settlements that improve social fabric by removing barriers and creating opportunities for positive interactions, through the promotion the delivery of affordable housing.

This policy has some regard to the Council's Socio-Economic Duty, encouraging the market to contain affordable homes for those experiencing inequalities.

Both will likely have negative impacts on biodiversity and AHOM2 will adversely impact on soil as it allows for development outside development limits which may involve greenfield land.

ISA Comments & Recommendations

Ensure that the definition of local needs (as contained within AHOM2) is reflective of the Socio-Economic Duty and Equality Duty to address the inequalities that result from differences in occupation, education, place of residence, social class, or/and protected characteristic, with relevant relation to affordable housing need.

SP7: Employment and the Economy					
Specific Policies	EME1: Safeguarding of Employment Sites EME2: Employment – Extensions and Intensification EME3: Employment Proposals on Allocated Sites EME4: Employment Proposals on Non-Allocated Sites EME5: Home Base Businesses				
ISA Objective	**EME1**	**EME2**	**EME3**	**EME4**	**EME5**	**Mitigating Policies**
ISA1 – Sustainable Development	+	I	I	I	I	See relevant policies below (ISA2/3/4/5/6/7/8/9)
ISA2 – Biodiversity	0	I	-	-	I	SP12: Placemaking and Sustainable Places SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks, and Features Of Distinctiveness PSD3: Green and Blue Infrastructure Network PSD4: GBI – Trees, Woodlands, and Hedgerows
ISA3 – Air Quality	0	-	-	-	0	PSD3: Green and Blue Infrastructure Network PSD12: Light and Air Pollution

ISA4 – Climatic Factors	0	-	-	-	0	**SP12: Placemaking and Sustainable Places** **CCH3: Electric Vehicle Charging Points** **CCH5: Flood Risk Management and Avoidance** **TRA2: Active Travel**
ISA5 – Water	0	I	I	I	I	**SP 9: Infrastructure** **SP 12: Placemaking and Sustainable Places** **CCH4: Water Quality and the Protection of Water Resources** **CCH5: Flood Risk Management and Avoidance** **INF5: Rural Allocations outside Public Sewerage System Catchments (SG3)**
ISA6 – Material Assets	0	+	+	+	-	
ISA7 – Soil	0	I	I	I	0	**PSD3: Green and Blue Infrastructure Network** **SP14: Maintaining and Enhancing the Natural Environment**
ISA8 – Cultural Heritage	0	I	0	I	0	
ISA9 – Landscape	0	I	I	0	I	**SP12: Placemaking and Sustainable Places** **BHE2: Landscape Character** **PSD11: Noise Pollution**
ISA10 – Population	+	+	+/-	+	?	

ISA11 – Welsh Language	0	+	+	+	?	**SP 8: Welsh Language and Culture** **WL1: Welsh Language and New Developments** **PSD9: Advertisements**
ISA12 – Health and Well-being	0	+	+	+	?	
ISA13 – Education and Skills	0	+	+	+	+	
ISA14 – Economy	++	++	++	++	++	
ISA15 – Social Fabric	+	+	+	+	+	

Commentary
EME1 – exceptions listed in policy wording may allow for other kinds of development indirectly beneficial to ISA10/15 dependent on development type. This factor allows for changes to suit local needs. Nevertheless, the main purpose of this policy is to safeguard land for future employment use which has direct benefit for the future economy (and relates to the WBFGA Goals)   **EME3** – These sites will be assessed separately in more detail within section 6.8 of the ISA Report. This policy provides more opportunities for sustainable and small businesses with mixed use sites (also employment, and potentially urban fabric benefits too). However, this allowance could also take up future development land reducing the land available for housing, if within competing areas.   **EME4 –** The ISA predicts no negative effects on ISA9 Landscape as the policy wording states that development must be of scale and type compatible with the surrounding area and will cause no unacceptable harm to local amenity. It should be a requirement that proposals for rural employment are accessible by alternative means of transport other than the private car.   **EME5 –** It is difficult to predict whether this policy would likely impact on ISA10/11/12.

ISA Comments & Recommendations

EME 2/EME3/EME4 – retention of onsite GBI would aid in the protection of the amenity of neighbouring properties.

EME3/EME4 – should refer to development proposals being non-detrimental in terms of the respective character and appearance of the townscape/ landscape, and must provide net benefits for biodiversity to overcome predicted ISA2 issues.

EME3 – policy wording to avoid conflict between different land uses.

SP8: Welsh Language and Culture		
Specific Policies	**WL1: Welsh Language and New Developments**	
ISA Objective	**WL1**	**Mitigating Policies**
ISA1 – Sustainable Development	**+**	
ISA2 – Biodiversity	**0**	
ISA3 – Air Quality	**0**	
ISA4 – Climatic Factors	**0**	
ISA5 – Water	**0**	
ISA6 – Material Assets	**0**	
ISA7 – Soil	**0**	
ISA8 – Cultural Heritage	**++**	

ISA9 – Landscape	**0**	
ISA10 – Population	**++**	
ISA11 – Welsh Language	**++**	
ISA12 – Health and Well-being	**+**	
ISA13 – Education and Skills	**+**	
ISA14 – Economy	**+**	
ISA15 – Social Fabric	**++**	
Commentary		
EME4 – This policy seeks to protect the Welsh Language across the County as it has been determined as linguistically sensitive which will have a strong positive effect on both ISA8 Cultural Heritage and ISA11 Welsh Language. This policy directly relates to Welsh Language requirements.		
ISA Comments & Recommendations		
Provide clarity on the need stated within the policy wording for mitigation (an overview in supporting text will suffice whilst retaining details for SPG).		

Strategic Policy	SP9: Infrastructure					
Specific Policies	**INF1: Planning Obligations** **INF2: Healthy Communities** **INF3: Broadband and Telecommunications** **INF4: Llanelli Waste Water Treatment Surface Water Disposal** **INF5: Rural Allocations outside Public Sewerage System Catchments**					
ISA Objective	**INF1**	**INF2**	**INF3**	**INF4**	**INF5**	**Mitigating Policies**
ISA1 – Sustainable Development	+	+	I	+	I	
ISA2 – Biodiversity	+	0	-	+	+/-	**SP14: Maintaining and Enhancing the Natural Environment** **NE1: Regional and Local Designations** **NE2: Biodiversity** **NE3: Corridors, Networks, and Features Of Distinctiveness**
ISA3 – Air Quality	0	+	+	0	0	**PSD12: Light and Air Pollution** **PSD3: Green and Blue Infrastructure Network**
ISA4 – Climatic Factors	0	+	+	+	0	**CCH5: Flood Risk Management and Avoidance**

ISA5 – Water	**+**	**0**	**0**	**+**	**+**	**CCH4: Water Quality and the Protection of Water Resources** **CCH5: Flood Risk Management and Avoidance**
ISA6 – Material Assets	**+**	**+**	**+**	**+**	**+**	
ISA7 – Soil	**0**	**0**	**?**	**+**	**+/-**	**PSD3: Green and Blue Infrastructure Network** **SP14: Maintaining and Enhancing the Natural Environment**
ISA8 – Cultural Heritage	**+**	**0**	**0**	**0**	**0**	
ISA9 – Landscape	**+**	**+**	**I**	**+**	**+/-**	**SP 15: Protection and Enhancement of the Built and Historic Environment** **BHE1: Listed Buildings and Conservation Areas** **BHE2: Landscape Character** **PSD12: Light and Air Pollution** **NE1: Regional and Local Designations**
ISA10 – Population	**+**	**+**	**+**	**+**	**+**	
ISA11 – Welsh Language	**+**	**0**	**+**	**0**	**?**	**SP 8: Welsh Language and Culture** **WL1: Welsh Language and New Developments** **PSD9: Advertisements**

ISA12 – Health and Well-being	+	++	+	+	+	
ISA13 – Education and Skills	+	+	+	0	0	
ISA14 – Economy	0	+	++	+	+	
ISA15 – Social Fabric	+	+	+	0	+	

Commentary

INF1 – Planning obligations can be used to contribute towards enhancing supporting infrastructure such as roads and public transport, schools and education, health, open space and green infrastructure, flood defences, biodiversity and Welsh language to ensure no negative effects remain as a result of development.

INF2 – The requirement for major developments to undertake a Health Impact Assessment has strong positive effects against ISA12 Health and wellbeing. The wording of the policy supports active travel, accessible useable green spaces, and infrastructure, reducing health inequalities, addressing the social determinants of health and providing accessible health care facilities. Encouraging healthy lifestyles is likely to result in a reduction of the need for health facilities which can have positive economic effects. This policy relates to mental health components HIA and ensures particular WBFGA goals.

INF3 – Ensuring new development will have access to high speed and reliable broadband is likely to facilitate economic growth and allow flexible home working. This is desirable for young people as well as small businesses and will have positive effects on social fabric and the economy. Improved telecommunications have other secondary benefits too, for example, home working can also reduce commuting rates which will be beneficial for air quality and carbon emissions. These developments are likely to be detrimental to ISA2/9. It is difficult to predict whether this kind of development will have longterm adverse effects on soil, although construction such as underground pipes is likely to cause short term adverse effects.

INF4 - This policy looks to safeguard the water quality of the Llanelli catchment area through the sustainable management of surface water. This policy performs well against the ISA Framework.

INF5 – This policy looks to resolve proliferation of private sewers which are having a detrimental impact on the environment. This is likely to reduce diffuse pollution and, therefore, protect biodiversity (and landscape by extension), however, this policy indirectly supports the creation of new developments in rural areas (potentially greenfield sites) adversely impacting upon biodiversity and soil, although beneficial to the long-term viability of local communities (in turn this may impact upon the Welsh Language although difficult to determine).

ISA Comments & Recommendations
INF5 – provide clarity/signpost to the mitigation policies within the supporting text.

SP10: Gypsy and Traveller Provision		
Specific Policies	**GTP1: Gypsy and Traveller Accommodation**	
ISA Objective	**GTP1**	**Mitigating Policies**
ISA1 – Sustainable Development	I	See relevant policies below.
ISA2 – Biodiversity	I	SP14: Maintaining and Enhancing the Natural Environment
ISA3 – Air Quality	0	
ISA4 – Climatic Factors	-	SP9: Infrastructure CCH4: Water Quality and Protection of Water Resources CCH5: Flood Risk Management and Avoidance SP16: Climate Change
ISA5 – Water	I	CCH4: Water Quality and the Protection of Water Resources CCH5: Flood Risk Management and Avoidance
ISA6 – Material Assets	+	
ISA7 – Soil	-	PSD3: Green and Blue Infrastructure Network

	 	SP14: Maintaining and Enhancing the Natural Environment
ISA8 – Cultural Heritage	**0**	
ISA9 – Landscape	**I**	**SP12: Placemaking and Sustainable Places** **BHE2: Landscape Character** **PSD11: Noise Pollution**
ISA10 – Population	**+**	
ISA11 – Welsh Language	**?**	**SP 8: Welsh Language and Culture** **WL1: Welsh Language and New Developments** **PSD9: Advertisements**
ISA12 – Health and Well-being	**+**	
ISA13 – Education and Skills	**+**	
ISA14 – Economy	**+**	
ISA15 – Social Fabric	**++**	
Commentary		

Development of any form has the potential to have a negative impacts on biodiversity and soil resources, however this can be sufficiently mitigated by compliance with SP14: Maintaining and Enhancing the Natural Environment. Similarly, any proposal for new gypsy sites or extensions to existing sites would need to ensure that sufficient water and sewerage resources were available in consultation with DCWW at the planning application stage, and sufficient access to utilities is a specific consideration in the policy. This policy seeks to provide for the needs of minority groups and therefore positive effects are predicted against socio-economic ISA Objectives and duties.

Alignment of this policy with ISA11 is difficult to determine. Growth and inward migration have the potential to dilute Welsh language and culture in certain areas. However, it does increase the potential for retaining young Welsh speakers in the county and so may also have a positive effect.

The location of the newly proposed site is in close proximity to existing residential and commercial development. Existing green Infrastructure corridors should also be maintained as buffer zones to mitigate any negative impacts on landscape.

This policy has some relation to the Socio-Economic Duty and Equality Duty by addressing the inequalities that result from differences in occupation, education, place of residence, social class, or/and protected characteristic. It directly supports ISA15 by removing barriers and creating opportunities for positive interactions, and improving accessibility to services, particularly for disadvantaged sections of society.

ISA Comments & Recommendations

It is recommended that the Council give due consideration as to whether SP9 complies with the policy requirements contained in Policy CCH5: Flood Risk Management and Avoidance in relation to flood risk. Such consideration should be further informed by any detailed / project level Flood Consequences Assessments (FCA). An FCA could assist in clarifying the likelihood and severity of flood risk on the 3 locations listed under Strategic Policy 9 to the Council.

The boundary of the proposed Pen-y-fan site has some scrub habitat which has biodiversity value as well as providing some screening of noise/air pollution from the adjacent railway line. The ISA recommends that this is retained as a buffer to the adjoining railway line.

SP10: The Visitor Economy				
Specific Policies	**VE1: Visitor Attractions and Facilities** **VE2: Holiday Accommodation** **VE3: Touring Caravan, Camping and Non-Permanent Alternative Camping Accommodation** **VE4: Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation**			
ISA Objective	**VE1**	**VE2**	**VE3**	**VE4**	**Mitigating Policies**
ISA1 – Sustainable Development	+/-	+/-	+/-	+/-	See relevant policies below.
ISA2 – Biodiversity	-	-	-	-	**SP14: Maintaining and Enhancing the Natural Environment**
ISA3 – Air Quality	I	I	-	-	**PSD12: Light and Air Pollution** **PSD3: Green and Blue Infrastructure Network** **CCH3: Electric Vehicle Charging Points** **TRA2: Active Travel**
ISA4 – Climatic Factors	I	I	-	-	**CCH5: Flood Risk Management and Avoidance** **CCH3: Electric Vehicle Charging Points** **TRA2: Active Travel**

ISA5 – Water	I	I	I	I	**CCH4: Water Quality and the Protection of Water Resources** **CCH5: Flood Risk Management and Avoidance** **PSD3: Green and Blue Infrastructure Network** **SP14: Maintaining and Enhancing the Natural Environment**
ISA6 – Material Assets	I	I	-	-	**CCH3: Electric Vehicle Charging Points** **TRA2: Active Travel**
ISA7 – Soil	I	I	I	I	**PSD3: Green and Blue Infrastructure Network** **SP14: Maintaining and Enhancing the Natural Environment**
ISA8 – Cultural Heritage	?	?	?	?	**SP15: Protection and Enhancement of the Built and Historic Environment** **BHE1: Listed Buildings and Conservation Areas** **BHE2: Landscape Character** **NE1: Regional and Local Designations** **SP 12: Placemaking and Sustainable Places** **PSD1: Effective Design Solutions: Sustainability and Placemaking** **PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods.**
ISA9 – Landscape	I	I	I	I	**SP12: Placemaking and Sustainable Places** **BHE2: Landscape Character** **PSD11: Noise Pollution**
ISA10 – Population	?	?	?	?	**SP1: Strategic Growth**

					SP3: Sustainable Distribution – Settlement Framework
ISA11 – Welsh Language	?	?	?	?	**SP 8: Welsh Language and Culture** **WL1: Welsh Language and New Developments** **PSD9: Advertisements**
ISA12 – Health and Well-being	+	+	+	+	
ISA13 – Education and Skills	+	+	0	0	
ISA14 – Economy	++	++	++	++	
ISA15 – Social Fabric	+	+	+	+	

Commentary

VE1/VE2 – Development outside development limits can sometimes result in increased private car use to reach such locations, however mitigation already exists in the policy in the form of the wording regarding the fact that proposals should be accessible by public transport/active travel routes. Development outside of settlement limits is also likely to result in the loss of greenfield land which can reduce permeable land and reduce the resilience of areas to flooding. Policies PSD3 GBI and CCH5: Flood Risk Management and Avoidance can mitigate for these negative impacts. Any potential negative impacts on landscape are mitigated by existing policy wording with regards to respecting the sense of place of an area in terms of scale, type, character, design etc.

VE3 /VE4 – Development of any form has the potential to have a negative impacts on biodiversity and soil resources, however this can be sufficiently mitigated by compliance with SP14: Maintaining and Enhancing the Natural Environment. Neither policy make reference to ensuring sites are accessible by public transport/active travel routes which could result in developments being located at unsustainable locations. Any potential negative impacts on landscape are mitigated by existing policy wording with regards to respecting the sense of place of an area in terms of scale, type, character, design etc. Potential for impacts on cultural heritage are uncertain as the policy does not identify specific sites and so it is difficult to determine whether impacts are

probable. This will be addressed at a planning application stage and is mitigated by compliance with policy SP15: Protection and Enhancement of the Built and Historic Environment. Provision of development for tourism purposes has multiple socio-economic benefits, as tourism is a key component of Carmarthenshire's economy and a major source of employment. Tourism facilities aligned with corporate policies such as the County's cycling aspirations has the potential to encourage walking/cycling, access to natural and cultural heritage and access to health and recreation facilities.

It difficult to predict the likely impact of tourism upon ISA8/10/11.

ISA Comments & Recommendations

VE1 – Consider placing this sentence from the supporting text into policy wording and strengthen wording (i.e.,g There *must* be no social, economic and environmental harm arising from the proposal, and satisfactory levels of accessibility must be in place).

VE3/VE4 – Suggest addition of this wording to both policies in order to mitigate for any negative effects on ISA3 Air Quality and ISA4 Climatic Factors:
(d)   they are suitably located in relation to the main highway network, as well as public transport and active travel routes, and adequate access can be provided without detriment to the natural and built environment.

Suggest addition of the mitigation of detrimental impacts within SP11 policy wording to apply to all policies. i.e., To facilitate environmental sustainability, new tourism-related developments must acknowledge local distinctiveness and sense of place, and be resilient to climate change and deliver net benefits for biodiversity. Alternatively, signpost to SP12

SP12: Placemaking and Sustainable Places

| Specific Policies | PSD1: Effective Design Solutions: Sustainability and Placemaking
PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
PSD3: Green and Blue Infrastructure Network
PSD4: Green and Blue Infrastructure – Trees, Woodlands, and Hedgerows
PSD5: Development and the Circular Economy
PSD6: Community Facilities
PSD7: Protection of Open Space
PSD8: Provision of New Open Space
PSD9: Advertisements
PSD10: Extensions
PSD11: Noise Pollution
PSD12: Light and Air Pollution
PSD13 Contaminated Land |

ISA Objective	PSD1	PSD2	PSD3	PSD4	PSD5	PSD6	PSD7	PSD8	PSD9	PSD10	PSD11	PSD12	PSD13	Mitigating Policies
ISA1 – Sustainable Development	++	++	++	+	++	++	++	+	+	+	+	+	+	
ISA2 – Biodiversity	I	I	++	++	0	I	+	+	0	I	+	+	I	SP14: Maintaining and Enhancing the Natural Environment
ISA3 – Air Quality	0	+	+	+	+	+	+	+	0	0	+	++	0	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network

														Policies
														CCH3: Electric Vehicle Charging Points **TRA2: Active Travel**
ISA4 – Climatic Factors	0	+	++	+	+	+	+	+	0	0	0	+	0	**CCH5: Flood Risk Management and Avoidance** **CCH3: Electric Vehicle Charging Points** **TRA2: Active Travel**
ISA5 – Water	+	+	+	+	0	I	+	+	0	0	0	0	+	**CCH4: Water Quality and the Protection of Water Resources** **CCH5: Flood Risk Management and Avoidance** **PSD3: Green and Blue Infrastructure Network** **SP14: Maintaining and Enhancing the Natural Environment**
ISA6 – Material Assets	0	+	+	0	++	+	+	+	0	0	0	+	+	**CCH3: Electric Vehicle Charging Points** **TRA2: Active Travel**
ISA7 – Soil	I	+	+	+	+	I	+	+	0	I	0	0	+	**PSD3: Green and Blue Infrastructure Network**

	1	2	3	4	5	6	7	8	9	10	11	12	13	
														SP14: Maintaining and Enhancing the Natural Environment
ISA8 – Cultural Heritage	+	+	+	+	0	+	0	0	+	0	+	+	I	
ISA9 – Landscape	+	+	+	+	0	+	+	+	I	I	+	+	+	SP12: Placemaking and Sustainable Places BHE2: Landscape Character PSD11: Noise Pollution
ISA10 – Population	+	+	+	+	0	++	+	+	+	+	+	+	0	
ISA11 – Welsh Language	0	+	0	0	0	+	0	0	++	0	0	0	0	
ISA12 – Health and Well-being	+	+	+	+	+	+	++	++	0	0	+	+	+	
ISA13 – Education and Skills	0	+	0	0	0	+	+	+	+	0	0	0	0	
ISA14 – Economy	+	+	+	+	+	+	+	+	+	0	0	0	0	
ISA15 – Social Fabric	+	+	+	+	+	+	++	++	+	0	+	+	0	

Commentary

PSD1 – This policy could have positive effects on ISA3 Air Quality and ISA4 Climatic factors if it made reference to low carbon design, renewable energy, and GBI provision. Predicted negative effects on biodiversity can be somewhat mitigated by compliance with policy SP13, however this could be further mitigated by specific reference in the policy to the protection and enhancement of biodiversity. The policy specifically references the need to ensure the satisfactory generation, treatment and disposal of both surface and foul water; the policy does not reference the integration of sustainable drainage into development design, which would further enhance the positive effects of this policy on ISA5 Water. The policy has neutral effects on ISA6 Material Assets but an addition to the policy referencing efficient use of transportation networks including connectivity to active travel routes, as well as some reference to circular economy and ensuring the layout and design of the development facilitates provision for recycling.

PSD9 – Positive effects are predicted against ISA11 Welsh Language and ISA13 Education and Skills as it may contribute to improving Welsh literacy within the County.

ISA Comments & Recommendations

PSD1 – Include in criteria a reference to low carbon design/ incorporation of renewable energy into development. Also make reference to incorporation of GBI into development proposals. Reference should be made to the need for development to have regard to the protection and enhancement of biodiversity and attributes of ecosystem resilience should identified and, as far as possible, incorporated into site design.

SP13: Rural Development					
Specific Policies	RD1: Replacement Dwelling in the Open Countryside RD2: Conversion and Re-Use of Rural Buildings for Residential Use RD3: Farm Diversification RD4: Conversion and Re-Use of Rural Buildings for Non-Residential Use RD5: Equestrian Facilities				

ISA Objective	RD1	RD2	RD3	RD4	RD5	Mitigating Policies
ISA1 – Sustainable Development	I	I	I	I	I	**See relevant policies below.**
ISA2 – Biodiversity	-	-	I	-	I	**SP14: Maintaining and Enhancing the Natural Environment**
ISA3 – Air Quality	-	-	+	+/-	-	**PSD12: Light and Air Pollution** **PSD3: Green and Blue Infrastructure Network** **CCH3: Electric Vehicle Charging Points** **TRA2: Active Travel**
ISA4 – Climatic Factors	-/+	-	+	+/-	-	**CCH5: Flood Risk Management and Avoidance** **CCH3: Electric Vehicle Charging Points** **TRA2: Active Travel**

ISA5 – Water	0	0	0	0	0	**CCH4: Water Quality and the Protection of Water Resources** **CCH5: Flood Risk Management and Avoidance** **PSD3: Green and Blue Infrastructure Network** **SP14: Maintaining and Enhancing the Natural Environment**
ISA6 – Material Assets	-	-	0	+	-	**CCH3: Electric Vehicle Charging Points** **TRA2: Active Travel**
ISA7 – Soil	?	?	0	0	0	**PSD3: Green and Blue Infrastructure Network** **SP14: Maintaining and Enhancing the Natural Environment**
ISA8 – Cultural Heritage	I	I	I	I	0	
ISA9 – Landscape	I	I	I	I	I	**SP12: Placemaking and Sustainable Places** **BHE2: Landscape Character** **PSD11: Noise Pollution**
ISA10 – Population	+	+	0	0	0	
ISA11 – Welsh Language	+/-	+/-	+/-	+	?	**SP 8: Welsh Language and Culture** **WL1: Welsh Language and New Developments** **PSD9: Advertisements**
ISA12 – Health and Well-being	+/-	+/-	I	I	0	

ISA13 – Education and Skills	0	0	+	I	I	
ISA14 – Economy	+	+	+	+	+	
ISA15 – Social Fabric	I	I	I	I	0	

Commentary
RD1/2/4 – Existing rural buildings of a certain age may contain protected species which would need to be investigated through an ecological survey as part of any planning application. Any potential for negative effects is mitigated through compliance with policy SP14: Maintaining and Enhancing the Natural Environment and policy NE2: Biodiversity, however the policy wording could be strengthened to further mitigate these impacts. Dwellings in the open countryside often require the use of private car to reach facilities and services which will have negative effects on ISA3 Air Quality, ISA4 Climatic Factors and ISA6 Material Assets. However, the replacement of older dwelling is likely to result in dwellings being built to higher energy efficiency standards which can result in energy saving. Effects on ISA9 Soil are uncertain as it will be dependent on the footprint of the proposed replacement dwelling. Adherence to policies PSD3 GBI and SP14: Maintaining and Enhancing the Natural Environment can mitigate for this uncertainty. The policy is explicit in that the dwelling to be replaced should not be a building that is important to the character of the landscape and that it should retain its traditional character which mitigates for any uncertainty of impacts on ISA8 Cultural Heritage and ISA9 Landscape. The policy does not encourage access to facilities and services, however it does increase access to the natural environment.   **RD3 –** Farm diversification can offer opportunities to add to the income streams of working farms which has a number of socio-economic benefits. It provides opportunities for young people living in rural areas to find employment without having to move out of the area, which will also have benefits for the retention of Welsh speakers in rural areas. Small enterprises such as farm shops can prevent the requirement of rural residents having to drive to larger towns in order to shop therefore reducing private car use and associated air quality issues and carbon emissions.   **RD1/2/3** – Increased residential properties in rural areas may provide homes to young Welsh Speakers, however, considering the cost typically associated with this kind of development, it may also provide second homes for inward mitigation   **RD4 –** This policy can have a number of socio-economic benefits, allowing conversion to non-residential uses such as employment and making use of redundant buildings in rural areas. This can contribute to encouraging rural enterprise and the provision of more facilities and services in rural areas. This is also beneficial for the retention of young people in rural areas due to the potential for increased employment opportunities, which can also result in the retention of young Welsh speakers.

RD5 – Provision of equestrian facilities in rural areas may lead to increased traffic to the area, in particular if specific events are held. This may have negative effects on air quality and increase carbon emissions. However, such facilities may introduce opportunities for employment, skills and training, as well as having recreation and economic benefits.

ISA Comments & Recommendations

RD1/RD2 – Add in text around protected species such as: Traditional rural buildings can provide important habitats for valuable species including bats and barn owls. Proposals for the conversion of such buildings will need to ensure there would be no significant adverse effects on protected species in-line with Policy NE2: Biodiversity and the Nature Conservation and Biodiversity SPG. Make reference to sustainable transport links and maximisation of adherence to the sustainable transport hierarchy for planning and policy CCH3: Electric Vehicle Charging Points.

To mitigate likely impacts upon biodiversity, state within specific policies (or within overarching SP13) that development should have no effect upon or have net benefits for biodiversity.

SP14: Maintaining and Enhancing the Natural Environment							
Specific Policies	NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness NE4: Development within the Caeau Mynydd Mawr SPG Area NE5: Coastal Management NE6: Coastal Development NE7: Coastal Change Management Area						

ISA Objective	NE1	NE2	NE3	NE4	NE5	NE6	NE7	Mitigating Policies
ISA1 – Sustainable Development	+	+	+	+	+	I	+	**CCH5: Flood Risk Management and Avoidance**
ISA2 – Biodiversity	++	++	++	++	+	+	+	**SP14: Maintaining and Enhancing the Natural Environment**
ISA3 – Air Quality	+	+	+	+	0	0	0	
ISA4 – Climatic Factors	+	+	+	0	+	+/-	+	**CCH5: Flood Risk Management and Avoidance**
ISA5 – Water	+	+	+	0	+	-	+	**CCH4: Water Quality and the Protection of Water Resources**

ISA6 – Material Assets	0	0	0	0	+	0	0	
ISA7 – Soil	0	0	0	0	+	0	0	
ISA8 – Cultural Heritage	+	+	+	+	0	0	0	
ISA9 – Landscape	+	+	+	+	0	0	0	
ISA10 – Population	+	+	+	+	0	0	+	
ISA11 – Welsh Language	0	0	0	0	0	0	0	
ISA12 – Health and Well-being	+	+	+	+	+	0	+	
ISA13 – Education and Skills	+	+	+	+	0	0	0	
ISA14 – Economy	+	+	+	+	0	+	+	
ISA15 – Social Fabric	+	+	+	+	0	0	+	
Commentary								

NE1, NE2, NE3 and NE4 all have positive effects across the ISA Objectives due to the protective nature of these policies on the Natural Environment, with strong positive effects predicted on ISA2 Biodiversity.

NE5 reference in the policy to adherence with SP14: Maintaining and Enhancing the Natural Environment sufficiently mitigates any potential for negative effects on Biodiversity.

NE6 facilitates development in coastal areas which can increase the risk of such proposals to flooding over the longer term, due to climate change, coastal erosion and sea level rise. This risk can be mitigated by Policy CCH5: Flood Risk Management and Avoidance. Increasing development on the coastline can also increase recreational pressure on such areas. This can have negative impacts on water quality, as well as increasing noise and light pollution. Reference should be made to recreational pressures in the supporting text in order to ensure such impacts are given due consideration in any planning application.

NE7 – Potential negative impacts on ISA2 Biodiversity and ISA9 Landscape are made neutral by the wording of the policy.

ISA Comments & Recommendations

- Reference should be made in Policy NE6 to the fact that the majority of Carmarthenshire's coastline is protected at an international level and that any proposals will be subject to Policies SP13, NE1 and NE2.
- Policy NE6, suggest adding wording to criteria - b) They will not unacceptably harm the seascape **or landscape** through inappropriate scale, mass and design to strengthen mitigation against negative impacts on ISA9 Landscape.
- Policy NE6 should also make reference to the fact that recreational pressures should be considered in any planning application.

Strategic Policy	SP15: Protection and Enhancement of the Built and Historic Environment		
Specific Policies	BHE1: Listed Buildings and Conservation Areas BHE2: Landscape Character		
ISA Objective	BHE1	BEH2	Mitigating Policies
ISA1 – Sustainable Development	+	+	
ISA2 – Biodiversity	0	+	
ISA3 – Air Quality	0	+	
ISA4 – Climatic Factors	0	+	
ISA5 – Water	0	+	
ISA6 – Material Assets	+	0	
ISA7 – Soil	+	+	
ISA8 – Cultural Heritage	++	+	

ISA9 – Landscape	+	++
ISA10 – Population	0	+
ISA11 – Welsh Language	+	0
ISA12 – Health and Well-being	0	+
ISA13 – Education and Skills	0	0
ISA14 – Economy	+	+
ISA15 – Social Fabric	+	+

Commentary

Policy BHE1 has positive effects across many ISA Objectives due to the protective nature of these policies on the built environment, with strong positive effects predicted on ISA8 Cultural Heritage. It is unknown whether this would have a likely impact upon the promotion of Welsh language, however it does for the promotion of Welsh culture,

BEH2 has positive effects across the ISA Objectives, with strong positive effects predicted on ISA9 Landscape.

ISA Comments & Recommendations

- There are no negative impacts predicted as a result of these policies.

SP16: Climate Change

Specific Policies	CCH1: Renewable Energy within Pre-Assessed Areas and Local Search Areas CCH2: Renewable Energy Outside Pre-Assessed Areas and Local Search Areas CCH3 Electric Vehicle Charging Points CCH4: Water Quality and the Protection of Water CCH5: Flood Risk Management and Avoidance CCH6: Renewable and Low Carbon Energy in New Developments CCH7: Climate Change – Forest, Woodland and Tree Planting

ISA Objective	CCH1	CCH2	CCH3	CCH4	CCH5	CCH6	CCH7	Mitigating Policies
ISA1 – Sustainable Development	+	+	+	+	+	+	+	
ISA2 – Biodiversity	+/-	+/-	+	+	+	+	+	SP14: Maintaining and Enhancing the Natural Environment NE2: Biodiversity
ISA3 – Air Quality	+	+	+	0	0	+	+	
ISA4 – Climatic Factors	++	++	+	+	++	+	+	
ISA5 – Water	+	+	+	++	+	+	+	

ISA6 – Material Assets	**+**	**+**	**+**	**0**	**0**	**+**	**0**	
ISA7 – Soil	**0**	**0**	**0**	**+**	**+**	**0**	**+**	
ISA8 – Cultural Heritage	**I**	**I**	**+**	**0**	**0**	**0**	**0**	**SP15: Protection and Enhancement of the Built and Historic Environment**
ISA9 – Landscape	**+/-**	**+/-**	**0**	**0**	**+**	**+/-**	**+**	**SP12: Placemaking and Sustainable Places** **BHE2: Landscape Character** **PSD11: Noise Pollution**
ISA10 – Population	**0**	**0**	**+**	**0**	**0**	**0**	**0**	
ISA11 – Welsh Language	**0**	**0**	**0**	**0**	**0**	**0**	**0**	
ISA12 – Health and Well-being	**0**	**0**	**+**	**0**	**+**	**0**	**+**	
ISA13 – Education and Skills	**+**	**+**	**0**	**0**	**0**	**?**	**?**	
ISA14 – Economy	**+**	**+**	**+**	**+**	**+**	**+**	**+**	
ISA15 – Social Fabric	**0**	**0**	**+**	**0**	**+**	**+**	**+/-**	

Commentary

CCH1/2 – Renewable energy is essential in ensuring a low carbon energy source and combatting climate change, therefore this policy has strong positive effects on ISA4 Climatic Factors. Proposals for renewable and low carbon energy development have the potential to have negative impacts on biodiversity, particularly when located in proximity to protected sites. These impacts can be someway mitigated by policy SP14: Maintaining and Enhancing the Natural Environment, however it is suggested that some wording is added into the policy itself to strengthen this mitigation. Any potential for negative impacts on ISA9 Landscape can be mitigated by policies SP11 Platemaking and Sustainable Places and BHE2: Landscape Character. These kind of developments are have potential to foster the development of skills associated with delivering innovative, climate responsive design.

CCH3 – Provision of Electric Charging Points in new developments will ensure that there is a growing network of charging point across the county to encourage electric car use. This is turn will have benefits for ISA3 Air Quality and ISA4 Climatic Factors, by reducing transport related emissions. Improvements to air quality are also beneficial to ISA12 Health and Well-being, ISA2 Biodiversity and ISA8 Cultural Heritage.

CCH4 – Is a protective policy for water quality and quantity and so has strong positive effects on ISA5 Water. Protecting water quality will also have positive impacts across the ISA Objectives, particularly on ISA2 Biodiversity as well as ISA7 Soil.

CCH5 – Ensuring development, in particular that considered vulnerable, is not built-in areas that flood is essential in increasing the resilience of Carmarthenshire to climate change, so this policy has positive effects against ISA4 Climatic Factors and ISA5 Water. This ensures that the wellbeing and safety of Carmarthenshire's residents as well as their property, so is positive against ISA Objectives ISA12 Health and Wellbeing, ISA14 Economy and ISA15 Social Fabric. Encouragement of SUDS can also have positive impacts on ISA2 Biodiversity.

CCH6 – The policy is strong on low carbon energy in new developments of 100 or more homes however, the policy could be stronger in supporting renewables in new development more generally, especially in smaller developments such as provision for roof based solar panels. This would result in strong positive effects being predicted against ISA4 Climatic Factors.

CCH7 – Tree planting can provide mitigation for climate change-based issues including improving air quality, sequestering carbon, preventing soil erosion and reducing risks of flooding. This policy is therefore predicted to have positive effects against ISA Objectives ISA3 – Air Quality, ISA4 Climatic Factors and ISA5 Water. If publicly accessible, new woodland can provide opportunities for recreation which will have positive effects against ISA12 Health and Wellbeing. Nevertheless, there has been some previous contention over woodland planting in rural communities.

ISA Comments & Recommendations

- Carmarthenshire has many protected sites many of which are in the proximity of the SSAs and LSAs. Specific reference should be made in policy CCH1 to the fact that any renewable energy development will not have an unacceptable impacts on Natura 2000 sites.
- Relevant SPG on CCH1/2 should include mitigation guidelines to avoid impacts upon biodiversity.
- CCH4 – Reference should be had to paragraph 11.534(a) of Policy PSD12 in relation to proposals that can lead to increases in nutrient loading to the environment and the potential impact on water and air.
- Suggest CCH5 makes reference to the risks as a result of climate change, so that this is considered as well as the current risk in any application.
- Suggest stronger wording is added to CCH6, with reference to supporting new development that has high energy performance, supports decarbonisation, tackles the causes of climate change and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures. Welsh Government's policy is to secure zero carbon buildings while continuing to promote a range of zero carbon technologies. It should also be noted that the plan also does not have any policies covering community energy projects and smaller scale renewable projects.
- CCH7 – policy wording should include the consideration of wider landscape issues (*Proposals should consider potential adverse effects upon the environment, cultural heritage, communities, and landscape, and, where appropriate, follow the mitigation hierarchy*) and highlight the multiple benefits which well managed trees can have.
- Make reference to climate and nature emergency as appropriate.

SP17: Transport and Accessibility

Specific Policies	TRA1: Transport and Highways Infrastructural Improvements TRA2: Active Travel TRA3: Gwili Railway TRA4: Redundant Railway Corridors TRA5: Highways and Access Standards in Developments

ISA Objective	TRA1	TRA2	TRA3	TRA4	TRA5	Mitigating Policies
ISA1 – Sustainable Development	I	+	I	+	+	See below policies.
ISA2 – Biodiversity	-	I	-	I	0	SP14: Maintaining and Enhancing the Natural Environment NE1: Regional and Local Designations NE2: Biodiversity NE3: Corridors, Networks and Features of Distinctiveness PSD3 GBI Network PSD4 GBI – Trees, woodlands and hedgerows
ISA3 – Air Quality	+/-	++	+	+	0	PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network
ISA4 – Climatic Factors	+/-	++	I	+/-	0	CCH3: Electric Vehicle Charging Points

						PSD12: Light and Air Pollution PSD3: Green and Blue Infrastructure Network
ISA5 – Water	0	+	I	0	0	
ISA6 – Material Assets	+/-	++	+	+	0	
ISA7 – Soil	-	-	-	+	0	PSD3 GBI Networks SP14: Maintaining and Enhancing the Natural Environment.
ISA8 – Cultural Heritage	I	I	+	+	0	SP15: Protection and Enhancement of the Built and Historic Environment PSD1: Effective Design Solutions: Sustainability and Placemaking PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods
ISA9 – Landscape	I	I	I	+	0	SP12: Placemaking and Sustainable Places PSD1: Effective Design Solutions: Sustainability and Placemaking BHE2: Landscape Character
ISA10 – Population	0	+	+	+	0	
ISA11 – Welsh Language	0	0	0	0	0	
ISA12 – Health and Well-being	+/-	++	+	+	+	CCH3: Electric Vehicle Charging Points PSD12: Light and Air Pollution

					PSD3: Green and Blue Infrastructure Network
ISA13 – Education and Skills	+	+	0	0	0
ISA14 – Economy	++	+	+	+	0
ISA15 – Social Fabric	+	+	+	+	0

Commentary

TRA1 – Construction of transport infrastructure can have negative impacts on ISA2 Biodiversity through direct habitat loss and indirectly through decreasing air quality and disturbance. In particular, development in the Cross Hands area can have impacts on the Caeau Mynydd Mawr SAC by causing habitat loss of the Marsh Fritillary Butterfly. Any negative impacts on the Caeau Mynydd Mawr SAC impact are mitigated by the Caeau Mynydd Mawr SPG which seeks developer contributions to compensate for habitat loss. Both negative and positive effects are predicted for this policy against ISA Objectives ISA3, ISA4, ISA6 and ISA12. Negative impacts on air quality, as well as increasing carbon emissions may occur as a result of facilitating an increase in traditional means of transport such as cars and HGVs. This can be some way mitigated by policies CCH3: Electric Vehicle Charging Points which increases the county's infrastructure for electric vehicles, PSD12: Light and Air Pollution and PSD3: Green and Blue Infrastructure Network. However this policy also makes provision for sustainable transport networks which can reduce the use of private cars and associated air quality impacts. Specific reference to improvements to walking, cycling and bus routes in Carmarthen is welcome, as the town is identified as a principal centre in the plan however has an AQMA due to air quality issues. Positive impacts are predicted against ISA Objectives ISA13, ISA14 and ISA15 due to the fact that increasing infrastructure will result in better access to facilities and services including education facilities.

TRA2 – Proposals that encourage new active travel routes may have negative impacts on biodiversity and soil provision due to direct habitat loss. However, these impacts will be mitigated at a planning application level by policies SP14: Maintaining and Enhancing the Natural Environment, NE1: Regional and Local Designations, NE2: Biodiversity, NE3 Corridors, networks and features of distinctiveness, PSD3 GBI Network and PSD4 GBI – Trees, woodlands and hedgerows. Increasing the ability of cyclists and walkers to access safe and connected paths will have positive impacts on ISA12 - Health and Wellbeing, and may result in less private car use which has positive impacts on ISA3 Air Quality and ISA4 Climatic Factors. Nevertheless, thoughtful development may safeguard biodiversity in the long-term.

TRA3 - The Gwili Railway is immediately adjacent to the River Teifi and is in some places, within the C2 flood zone. The impacts of flooding in particular due to climate change may have negative impacts on ISA4 Climatic Factors and ISA5 Water.

TRA4 – The use of redundant rail corridors will facilitate benefits such as cycle paths, footpaths and bridleways, which in turn will have positive impacts on health and wellbeing as well as economy, and access to facilities and services. Railway corridors that have been redundant for some time may have valuable biodiversity associated with it and so clearance of such routes may have negative impacts, However, this is mitigated by policies SP14: Maintaining and Enhancing the Natural Environment, NE1: Regional and Local Designations, NE2: Biodiversity, NE3 Corridors, networks and features of distinctiveness, PSD3 GBI Network and PSD4 GBI – Trees, woodlands and hedgerows. Nevertheless, thoughtful development may safeguard biodiversity in the long-term.

ISA Comments & Recommendations

- **TRA3**: The Gwili Railway is immediately adjacent to the River Teifi and is in some places, within the C2 flood zone. This should be considered carefully under any ambitions to extend the line.

SP18: Mineral Resources				
Specific Policies	MR1: Mineral Proposals MR2: Mineral Buffer Zones MR3: Mineral Safeguarding Areas			
ISA Objective	**MR1**	**MR2**	**MR3**	**Mitigating Policies**
ISA1 – Sustainable Development	**-**	**0**	**0**	**See below**
ISA2 – Biodiversity	**-**	**0**	**-**	**SP14: Maintaining and Enhancing the Natural Environment** **NE1: Regional and Local Designations** **NE2: Biodiversity** **NE3: Corridors, Networks and Features of Distinctiveness** **PSD3: GBI Network** **PSD4: GBI – Trees, woodlands, and hedgerows** **MR1: Mineral Proposals**
ISA3 – Air Quality	**-**	**0**	**-**	**PSD12: Light and Air Pollution** **PSD3: Green and Blue Infrastructure Network** **MR1: Mineral Proposals**
ISA4 – Climatic Factors	**-**	**0**	**0**	**CCH3: Electric Vehicle Charging Points**

	 			PSD12: Light and Air Pollution **PSD3: Green and Blue Infrastructure Network**
ISA5 – Water	**-**	**+**	**0**	
ISA6 – Material Assets	**-**	**0**	**0**	**Strategic Policy SP 18: Mineral Resources**
ISA7 – Soil	**-**	**0**	**-**	**PSD3 GBI Networks** **SP14: Maintaining and Enhancing the Natural Environment.** **MR1 Mineral Proposals**
ISA8 – Cultural Heritage	**I**	**0**	**I**	**SP15: Protection and Enhancement of the Built and Historic Environment** **PSD1: Effective Design Solutions: Sustainability and Placemaking** **PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods**
ISA9 – Landscape	**I**	**+**	**-**	**SP12: Placemaking and Sustainable Places** **PSD1: Effective Design Solutions: Sustainability and Placemaking** **BHE2: Landscape Character** **MR1 Mineral Proposals**
ISA10 – Population	**0**	**+**	**0**	
ISA11 – Welsh Language	**0**	**0**	**0**	

ISA12 – Health and Well-being	**-**	**+**	**0**	**PSD12: Light and Air Pollution**
ISA13 – Education and Skills	**0**	**0**	**0**	
ISA14 – Economy	**+**	**0**	**+**	
ISA15 – Social Fabric	**0**	**+**	**0**	

Commentary

MR1 – The location of aggregates is driven by site specific geological conditions and so has less flexibility to avoid impacts on sensitive ecological features. However, the policy itself has wording to protect no unacceptable adverse impacts upon sites of nature conservation importance and any residual impacts can be mitigated by other plan policies, in particular compliance with SP14: Maintaining and Enhancing the Natural Environment. The policy wording itself mitigates for any potential negative impacts on ISA3 Air Quality, ISA4 Climatic Factors, ISA5 Water, ISA6 Material Assets, ISA8 Cultural heritage and ISA9 Landscape. The LDP policies identified in the matrix also further mitigate for any potential for impacts that may remain. This type of development by its very nature of finite resources, would not ISA1.

MR2 - Buffer zones are put in place in order to protect any new development, in particular residential areas, hospitals, schools, from any adverse impacts as a result of mineral extraction activities. This results in strong positive impacts on ISA12 Health and Wellbeing, as well as positive effects on ISA9 Landscape, ISA10 Population and ISA15 Social Fabric.

MR3 – This policy safeguards mineral deposits, however they are safeguarded with the intention of being available for working in the future. This working of minerals deposits can have negative effects on biodiversity, soil, landscape, and air quality, however the criteria of Policy MR1 Mineral Proposals will mitigate this risk.

ISA Comments & Recommendations

MR1 – Change policy wording to ensure developments create net benefits for biodiversity and climate to mitigate adverse effect idenfied above. Likely impact upon water resources needs addressing.

SP19: Sustainable Waste Management				
Specific Policies	**WM1: Sustainable Waste Management and New Development** **WM2: Landfill Proposals** **WM3: Agricultural Land – Disposal of Inert Waste**			
ISA Objective	**WM1**	**WM2**	**WM3**	**Mitigating Policies**
ISA1 – Sustainable Development	+	-	+/-	See relevant policies below
ISA2 – Biodiversity	0	-	-	**SP14: Maintaining and Enhancing the Natural Environment** **NE1: Regional and Local Designations** **NE2: Biodiversity** **NE3: Corridors, Networks and Features of Distinctiveness** **PSD3 GBI Network** **PSD4 GBI – Trees, woodlands and hedgerows**
ISA3 – Air Quality	0	-	0	**PSD12: Light and Air Pollution** **PSD3: Green and Blue Infrastructure Network**

ISA4 – Climatic Factors	**0**	**-**	**0**	**CCH3: Electric Vehicle Charging Points** **PSD12: Light and Air Pollution** **PSD3: Green and Blue Infrastructure Network**
ISA5 – Water	**0**	**I**	**?**	
ISA6 – Material Assets	**++**	**-**	**+/-**	
ISA7 – Soil	**+**	**I**	**+**	**PSD3 GBI Networks** **SP14: Maintaining and Enhancing the Natural Environment.**
ISA8 – Cultural Heritage	**0**	**I**	**I**	**SP15: Protection and Enhancement of the Built and Historic Environment** **PSD1: Effective Design Solutions: Sustainability and Placemaking** **PSD2: Masterplanning Principles – Creating Sustainable Neighbourhoods**
ISA9 – Landscape	**+**	**-**	**I**	**SP12: Placemaking and Sustainable Places** **PSD1: Effective Design Solutions: Sustainability and Placemaking** **BHE2: Landscape Character**
ISA10 – Population	**0**	**0**	**0**	
ISA11 – Welsh Language	**0**	**0**	**0**	
ISA12 – Health and Well-being	**+**	**I**	**0**	

ISA13 – Education and Skills	+	0	0	
ISA14 – Economy	+	+	+	
ISA15 – Social Fabric	+	0	0	

Commentary

WM1 – This policy promotes a circular economy across all types of development.

WM2 – Whilst the policy wording is prescriptive in manner, this type of development requires land resources and likely poses long-term adverse effects upon the environment (including air quality, water quality, and soil function, and human health and wellbeing).

WM3 – This policy may conflict with the ideals of the circular economy.

ISA Comments & Recommendations

WM2/3 – make specific reference to having no significant impact on biodiversity.
WM3 – Refine what is considered a inert waste and ensure that it will not pose any adverse effect to the environment, biodiversity, and/or human health, and will not endanger the quality of water resources.

Appendix H

Welsh Language Impact Assessment

Welsh Language Impact Assessment of Carmarthenshire Revised LDP 2018-2033 Draft Second Deposit

Authors of the Report

Dr Kathryn Jones (IAITH) and Owain Wyn (BURUM)

IAITH Cyf.
Uned 3,
Parc Busnes Aberarad,
Castellnewydd Emlyn,
Sir Gâr, SA38 9DB

Ff 01239 711668
E post@iaith.eu
www.iaith.eu

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KEY DEFINITIONS

Consequence - the effect of a hazard on the presence of future persons or households who can speak Welsh if it happened usually measured on a scale of severity of outcome (similar to impact).

Decision Making - The process of identifying the likely consequences of decisions, establishing the importance of individual factors, and selecting the best course of action to address risk to the vitality of the Welsh language.

Exposure - the consequences, as a combination of impact and likelihood, which may be experienced by the Welsh language if a specific risk is realised.

Hazard - A situation or action that could lead to harm to the Welsh language or cause negative effects.

Inherent Risk - the exposure arising from a specific risk before any action has been taken to manage it.

Impact - The effect that a risk would have if it happens.

Likelihood of occurrence - the likelihood of risk of a hazard occurring. Rather than being precise (which is often spurious accuracy) the suggested option in this report is for this to be done in bands.

Qualitative risk assessment - Describes the probability of an outcome in terms that are by their very nature subjective as the assessment typically assigns relative values to assets, risks, controls and effects.

Quantitative risk assessment - A methodology used to organise and analyse scientific information to estimate the likelihood and severity of an outcome. In this approach, objective numeric values are calculated for each component gathered during a risk assessment.

Residual risk - The exposure arising from a specific risk after action has been taken to manage it and making the assumption that the action is effective.

Resilience - the power or ability to recover quickly to a previously better condition despite the presence of risk factors.

Risk - A combination of possible consequence(s) of hazards <u>and</u> their likelihood.

Risk Advantage - Adopting a strategy that increases the likelihood that it will be possible to take advantage of unanticipated positive effects.

Risk Assessment - The formal process of evaluating the consequences of hazards <u>and</u> their likelihood.

Risk Management - The process of identifying, assessing and judging risk and weighing up the available options for responding to risk and deciding upon the preferred strategy.

Risk Tolerance - the threshold to go beyond which is unacceptable.

Scenario building - provides a structured way to think about and plan for future uncertainties and explores plausible pathways of how more than one possible future might develop.

Uncertainty - Limitations of our knowledge about the effects of people choosing which language to use and the factors that influence that decision.

Weighted Threshold - the different values given to the range of percentages of Welsh speakers present in a unit of area, e.g., in this study it is 70% and over = 3; 50 – 69.9% = 2; 20 – 49.9% = 1; less than 20% = exact percentage.

Welsh Impact Assessment - the likely effect of a proposed development plan or land use development on the use/resilience of the Welsh language in an area.

Part 1 – Welsh Language Impact Assessment Methodology

1.1   Introduction

1.   Carmarthenshire County Council (the Council) wishes to undertake further assessment on the Carmarthenshire LDP Preferred Strategy's likely impact on the Welsh language within the Plan area.

2.   The first stage involves agreeing upon the impact assessment methodology to be used. The criteria to be used for agreeing upon a methodology are that the approach needs to be <u>comprehensive</u>, <u>realistic</u> and <u>suitable</u>.

3.   The approach adopted here is to review existing guidelines to understand what are required of Local Planning Authorities (LPA's) and then review existing Welsh Language Impact Assessment (WLIA) methodologies to see whether such methodologies are still fit for purpose. In the light of this review, we then explore what other methodologies are possible, examined against the criterion of comprehensiveness, deliverability and suitability and make recommendations on the preferred methodology to be used.

1.2   The Policy Context - Planning Policy Wales and TAN 20: Planning and the Welsh Language

4.   Planning Policy Wales (PPW) Edition 11, published in February 2021, makes it clear that the Welsh language is "part of the social and cultural fabric" (of Wales) and "the land use planning system should take account of the conditions which are essential to the Welsh language and contribute to its use and thriving Welsh language goal".[1]

5.   Prior to PPW edition 10 (published December 2018), LPA's were asked to consider that if protecting/promoting the Welsh language was identified as a priority in their Single Integrated Plan, then the needs of protecting/promoting the Welsh language should be, so far as relevant to the development and use of land, taken into consideration in developing their local development plans using the mechanism of the Sustainability Appraisal (SA).

6.   TAN 20 was published prior to PPW 10 in October 2017 and explains the legislation and policy framework to consideration of land use planning and the Welsh language (Part A) and provides advice on how to consider the Welsh language in the local development plan process (Part B). The emphasis is on using the SA framework to develop a sustainable objective for the Welsh language and to assess the soundness of the Local Development Plan (LDP) against the objective set. It is noted that this advice is non-prescriptive. It also continues to adopt the advice for undertaking SA/SEA (Strategic Environment Assessment) assessments developed in 2005.

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[1] Welsh Government (February 2021) Planning policy Wales Edition 10, section 3.25.

1.3   Review of Existing Methodologies

1.3.1   Sustainability Appraisal/Strategic Environment Assessment

7.   Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the options, preferred strategy and proposals in a plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a plan must do so "with the objective of contributing to the achievement of sustainable development".

Guidance on SA/SEA methodology

8.   The stages of a Sustainability Appraisal of Local Development Plans are as follows:
   - **Scoping** - setting the context and objectives, establishing the baseline and deciding on the scope;
   - **Assess Local Development Plan strategic options** against the Sustainability Objectives and produce Sustainability Appraisal Report;
   - **Assess Local Development Plan policies** against the Sustainability Objectives and produce Sustainability Appraisal Report;
   - **Produce a Sustainability Statement** stating how the findings of the Sustainability Appraisal has been considered in the final Plan.

9.   In terms of assessment against SA objectives, LDP's are asked to identify the likely significant effects of the option taken. Prediction of effects involves identifying likely changes to the baseline. Prediction of effects should include magnitude of the plan's effects, the sensitivity of the receptor and the effect characteristics.

10. Most assessments are based on adopting a predominantly qualitative approach. This is due to the difficulty in separating out the effects of the proposed plan from other effects and the broad scope of the plan itself.

11. In general, SA/SEA assessments focus on the direction of travel (i.e., broad-brush and descriptive) rather than on a specific outcome. Scores for predicting likely effects typically follow the guidance published for undertaking SEA's published in 2005[2]. Using this guidance, predicted likely effects are scored as follows:

++	major
+	positive
0	neutral
-	negative
--	negative

12. The scoring framework also allows for 'uncertain(?)' where there the effects cannot be predicted.

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[2] Office of the Deputy PM, UK Government (2005) A Practical Guide to the Strategic Environmental Assessment Directive, Appendix 7.

13. The Scoring Matrix suggested by Welsh Government in its Development Plans Manual[3] adopts this approach and is reproduced in Figure 1.1. This matrix assesses the sustainability of the proposed options in relation to the current situation at the time of conducting the assessment. Given that LDP timescales are typically for a period of 15 – 20 years, it is our view that the assessment will have more saliency if conducted in relation to the LA's predicted trajectory for population growth over the lifetime of the plan.

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[3] Welsh Government (March 2020) Development Plans Manual, Edition 3.

Figure 1.1: Welsh Government Suggested SA/SEA Scoring Matrix[4]

Symbol	Predicted effect	Suggested action
++	Very positive effects compared to the current situation	Consider any further enhancement measures
+	Positive effect compared to the current situation	Consider any further enhancement measures
0	Neutral effect compared to the current situation	Consider whether intervention could bring positive effects
-	Negative effect compared to the current situation	Consider mitigation measures: first avoidance of the impact, then reduction of impact, and finally compensation for the impact. Reconsider policy/proposed use.
--	Very negative effect compared to the current situation	Consider mitigation measures to reduce the severity of the effect, but these are likely to be difficult and/or expensive. Reconsider the policy or proposed use.
I	Effect depends on how the policy and allocation are implemented	Suggestions for implementation
?	Uncertain	More information is required. Consider where the information could be sourced? How and when it could be collected.

1.3.2 Current approaches to WLIA among Local Planning Authorities

14.   **Appendix 1.1** provides a snapshot of adopted LDP's and SPG's and their consideration of the Welsh language as reviewed by IAITH/BURUM in 2019, updated to August 2022. Of the 24 Development Plans[5] examined, eleven LPA's had a specific policy 'hook' in relation to the Welsh language. Nine LPA's had identified geographic/spatial areas within their boundaries with the Gwynedd and Ynys Môn and Eryri LDP's having Plan-wide policies. In these plans, additional weighting is given to Welsh language considerations. Typically, these considerations are applied as a part of general development plan policies and proposals against which specific proposals are assessed. The IAITH/BURUM review indicated that, where relevant, almost all LPA's advocated using the WLIA methodology described in *Planning and the Welsh Language: The Way Ahead* (2005).

1.3.3 Planning and the Welsh Language: The Way Ahead (2005)

15.   The key stages involved in the Welsh Language Impact Assessment methodology presented in *Planning and the Welsh Language: The Way Ahead (2005)* WLIA involve:
- Formulating a Checklist (including a baseline)
- Scoring the checklist for likely effects
- Calculating the Overall Impact Index
- Assessing against the linguistic sensitivity of the site / area.

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[4] Welsh Government (March 2020) Development Plans Manual, Edition 3
[5] Gwynedd and Ynys Môn have adopted a Joint Local Development Plan

16.   This methodology has several limitations. It should be noted that while it is widely used, *The Way Ahead* has no official status and has never been endorsed by Welsh Government as its recommended WLIA methodology. Other limitations to this WLIA methodology are listed below:

- It was principally designed and used for the purpose of assessing individual applications and not for assessing the impact of development plans.
- The role and responsibilities of other stakeholders (in addition to the LPA) in undertaking a Language Impact Assessment is unclear.
- The relationship between the impact of a proposed development on the vitality of the Welsh language and some of the 18 questions that form the assessment seem weak or difficult to measure because, at times, the quality of the data is not current or useful. In addition, no future scenario modelling methods are used.
- The Overall Impact Index does not give guidance regarding the weighting that should be considered for the results of the 18 questions. Although the methodology acknowledges the option to weigh up the five components of "community life" and the 18 associated questions, in practice this weighting is not often used in WLIAs.
- This methodology only measures impact against the baseline and not against anticipated trajectories for change in the future. It does not acknowledge that the vitality/ resilience of the Welsh language will change over time and respond to economic and social drivers along with other drivers such as people's aspirations and attitudes and to national and local policies.
- It is often not clear what the subjective basis is for deciding whether an impact is significant or not.
- The response is only considered in the context of mitigating measures and the (mitigating) measures proposed have not necessarily taken into account what linguistic factors are appropriate and relevant to the context.

1.4   Alternative Approaches to Risk Assessment and Management

17.   The Anglesey and Gwynedd LDP SPG (adopted July 2019)[6] has pioneered an innovative approach in its guidance to developers for the assessment of likely effects on the Welsh language of housing or employment development proposals on large unforeseen or 'windfall' sites.

18.   The guidance suggests a methodology based on a more detailed consideration of predicted effects and broadly follows the methodology underpinning the UK Government's Guidelines for Environmental Risk Assessment and Management, *Green Leaves III*[7]. In turn, *Green Leaves III* follows developments in the field of risk assessment and management widely used in a range of public policy contexts.

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[6] Gwynedd and Ynys Môn Councils (2019) Gwynedd and Ynys Môn Local Development Plan Supplementary Planning Guidance *Creating and Sustaining Distinctive Communities*.

[7] UK DEFRA/Cranfield University (2011) *Green Leaves III Guidelines for Environmental Risk Assessment and Management*

19.   The International Organization for Standardization (ISO) has adopted an *International Standard (31000:2009) on Risk Management*.[8] This provides principles and guidelines for use across all organisations and situations. The introduction to ISO 31000 explains the reasoning behind the introduction of a worldwide standard:
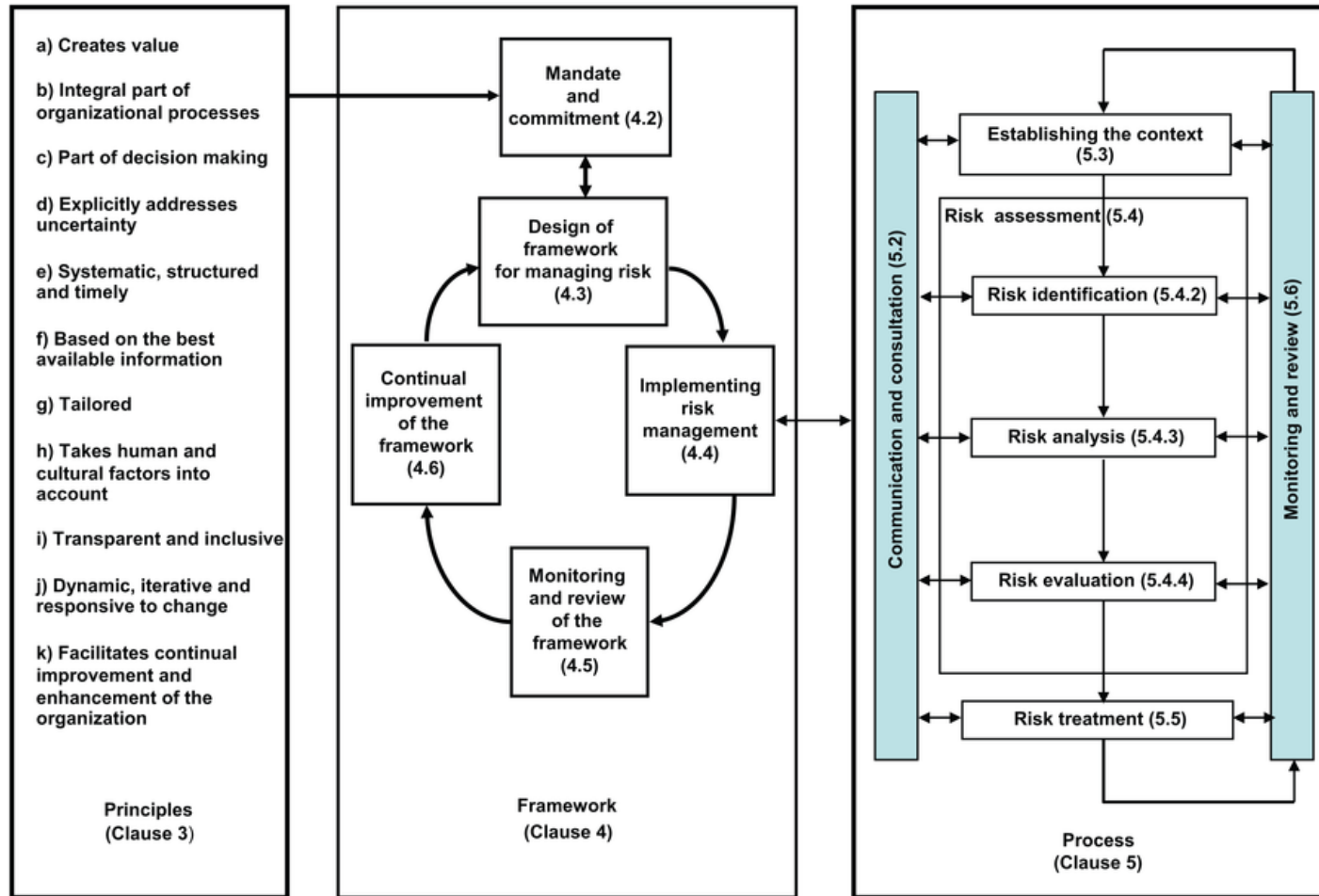
"Although the practice of risk management has been developed over time and within many sectors in order to meet diverse needs, the adoption of consistent processes within a comprehensive framework can help to ensure that risk is managed effectively, efficiently and coherently across an organization. The generic approach described in this International Standard provides the principles and guidelines for managing any form of risk in a systematic, transparent and credible manner and within any scope and context.

In general terms, 'risk management' refers to the architecture (principles, framework and process) for managing risks effectively, while 'managing risk' refers to applying that architecture to particular risks."

20.   **Figure 1.2** overleaf has been reproduced from the ISO 31000 document. It presents a model of risk management that identifies the relationship between the principles that underpin the management of risk, a framework to follow in undertaking risk management, and the detailed process of conducting a risk assessment.

21.   ISO guidelines identify the following characteristics of effective risk management:
   - describing and establishing the context;
   - identifying, analysing, assessing, and addressing risk; and
   - communicating and consulting with stakeholders throughout the process.

22.   The characteristics listed above are not too dissimilar to the steps of undertaking a SA/SEA assessment. While the focus is still broad-brush, the predicted likely effects are:
   - differentiated more clearly in terms of both the magnitude of consequences and likelihood of happening;
   - not given a neutral score thus avoiding a tendency amongst users of those frameworks that use odd scales (three, five, seven etc.) towards clustering around the central point.

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[8] International Organization for Standardization (2018) *Risk Management Principles and Guidelines*.

Figure 1.2: The Architecture of Effective Risk Management – the relationship between principles, framework and process[9]

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23. *Green Leaves III* recommends a cyclical framework for environmental risk management based on four main components:
     - formulating the issue or problem recognising the key pathways between source of hazard and receptor(s);
     - planning for and carrying out an assessment of the risk;
     - identifying and appraising the risk management options available;
     - addressing the risk with the chosen risk management strategy ensuring that the implemented strategy is appropriately monitored.

24. **Figure 1.3** presents a possible approach to Welsh Language Resilience Risk Management within the LDP plan-making process and is an adaption of this general risk management framework.

Figure 1.3: Welsh Language Resilience Assessment and Management Framework – the relationship between the Framework, the Process and the Context (Sustainability/Well-being Objectives).[10]

FRAMEWORK	PROCESS	POLICY CONTEXT
	Screening "Development plans should include a statement on how planning authorities have taken the needs and interests of the Welsh language into account in plan preparation and how any policies relating to the Welsh language interact with other plan policies." (PPW 3.27)	Sustainability/Well-being Objectives
STAGE 1 PREPARE FOR THE ASSESSMENT	Set the Context Identify and Engage with Key Stakeholders Develop Model Screen Out Insignificant Hazards Design the Assessment	Procure Baseline Data
STAGE 2 CONDUCT THE ASSESSMENT	Build Scenario Identify Main Hazards Assess Consequences Assess Likelihood Describe Risk and Uncertainty	Measure potential impact against Sustainability/ Well-Being Objectives

[10] Adapted from DEFRA/Cranfield University (2011) – "*Green Leaves III – Guidelines for Environmental Risk Assessment and Management*

| STAGE 3

APPRAISE THE OPTIONS | Evaluate impact on language reproduction factors
⬇
Evaluate impact on language production factors
⬇
Evaluate resource capacity to implement
⬇
Evaluate organisational capacity to implement
⬇
Choose preferred option | Measure potential impact against Sustainability/ Well-Being Objectives |
| STAGE 4

ADDRESS THE RISKS | Type of Response (e.g. mitigation/ benefit enhancement measures)
⬇
Monitoring/ Reporting Strategy
⬇
Produce Report | |
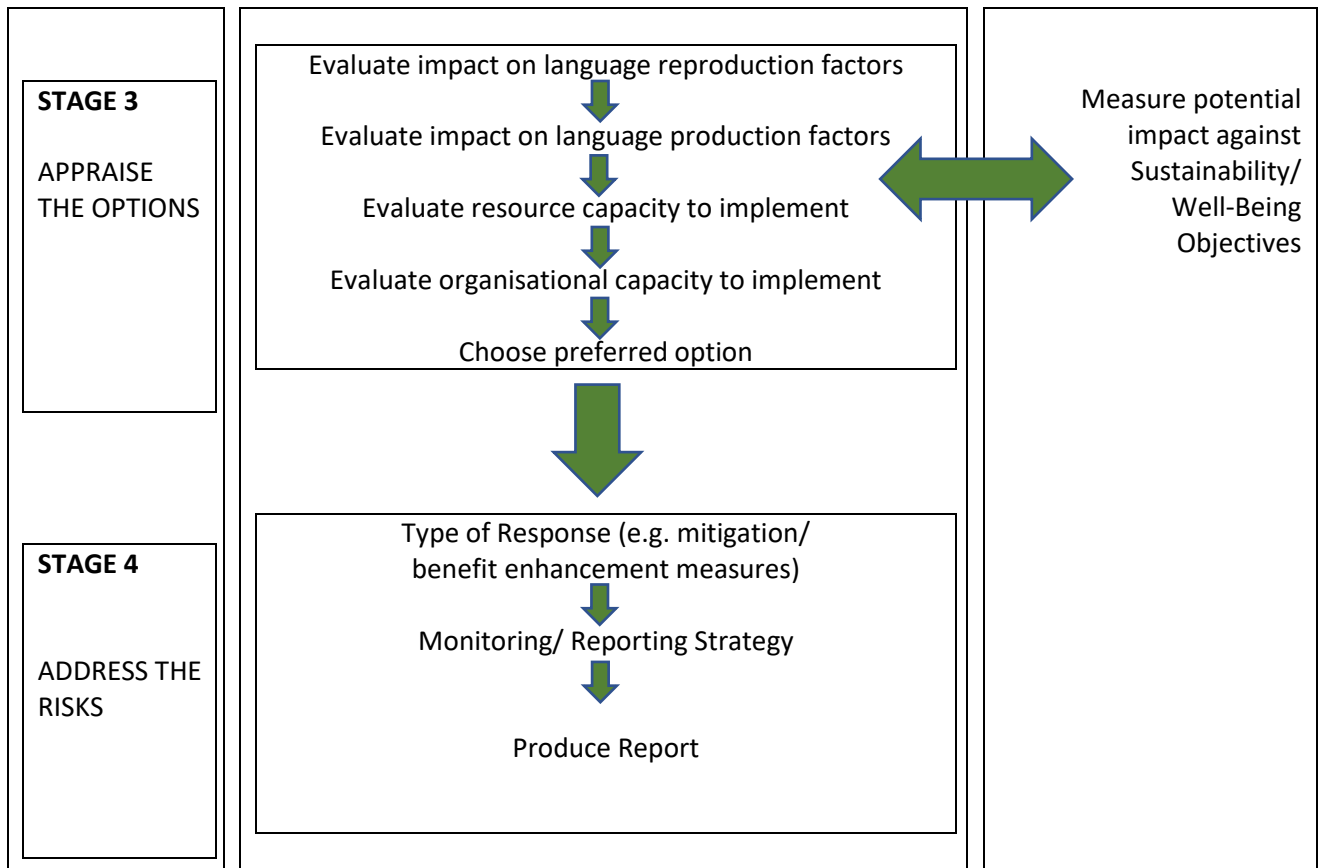
25. This model **presents** a process comprising of four stages:

Stage 1 – preparing for the risk assessment, defining the problem or issue with accuracy and designing the assessment;

Stage 2 – undertaking the risk assessment;

Stage 3 – identifying and considering the viable options and choosing a 'preferred strategy' to address or manage the risk;

Stage 4 – preparing an action plan to address the risk within the preferred strategy.

26. In **Figure 1.3**, the middle column outlines the steps to be followed and the matters to consider in each stage. The right-hand column addresses the criteria against which the risk is assessed and managed. The model assumes that the Local Development Plan reflects the Local Authority's aspirations at the end of the period of the plan (typically 15 years). The sustainability of this plan (including the sustainability of the Welsh language) will be assessed through the Sustainability Appraisal process.

1.4.1 Predicting Resilience Scores

27. HM Treasury's Orange Book identifies three important principles for identifying risks:

- *"Ensure that there is a clearly identified process in which both likelihood and impact are considered for each risk;*
- *Record the assessment in a way which facilitates monitoring and the identification of risk priorities;*
- *Be clear about the difference between inherent and residual risk."* [11]

1.4.2   Consequences and Likelihood

28.   The combination of consequence and likelihood chosen should be based on the risk of something happening within a defined time period. It is also vital to ensure that the selected likelihood score relates to the likelihood of a <u>level of consequence/impact occurring</u>, NOT just the likelihood of the activity/event/hazard occurring.

29.   It should be noted that is not necessary to have full certainty about facts and issues to rate risk. Nor does uncertainty automatically generate a high risk. The level of uncertainty is only a component of the risk calculation process. Risk assessment is therefore making the MOST informed decision possible that includes uncertainty.

30.   **Figure 1.4** proposes a matrix for identifying risks to the resilience of the Welsh language from appraising the Preferred Strategy of the Carmarthenshire LDP. Although it is possible to develop more sophisticated matrices, we believe that the proposal better meets the criteria required for the methodology, particularly in terms of deliverability. It proposes the use of a 4*4 matrix based on the following impact and likelihood scales:

Impact		Likelihood	
Major Positive	+2	Almost Certain/Highly Likely	4
Minor Positive	+1	Likely/Probable	3
Minor Negative	-1	Realistic Possibility/UnLikely	2
Major Negative	-2	Highly Unlikely/ Remote Chance	1

31.   This proposed model acknowledges that the risk assessment will need to be revisited as time goes on and/or as new or better information and evidence becomes available.

32.   **Appendix 1.2** describes the proposed *Welsh Language Resilience Assessment and Management Framework* methodology in greater detail.

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[11] HM Treasury (2004): *The Orange Book: Management of Risk- Principles and Concepts*

Figure 1.4: Proposed Welsh Language Resilience Risk Matrix

WELSH LANGUAGE RESILIENCE RISK MATRIX CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN			Welsh Language Resilience f(WLR) = NWS + PWS threshold weighted	MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD			
				Major Positive	Minor Positive	Minor Negative	Major Negative
				Increase of 2.5 percentage points or more in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Increase of less than 2.5 percentage points in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of less than 2.5 percentage points in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of 2.5 percentage points or more in the number of percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory
				High	Low	Low	High
	Probability	Frequency	Score	2	1	-1	-2
LIKELIHOOD	Experience shows that growth/decline in the population on this scale will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Previous Development Plan	Highly Likely 4	8	4	-4	-8
	Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases	Evidence to show it occurs at least 5 - 7 times out of 10 in the Previous Development Plan	Likely 3	6	3	-3	-6
	Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	Possible 2	4	2	-2	-4
	Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence to show it occurs at least 1 - 2 times out of 10 in the Previous Development Plan	Highly Unlikely 1	2	1	-1	-2

1.5   Limitations of Risk Assessment and Management Models

33.   As with other models, Risk Assessment and Management Models attempt to represent a system using a collection of concepts and assumptions to help people understand that system. In the context of the resilience of the Welsh language the attempt is to design a model of the 'real world' in terms of language use. There are, necessarily, constraints on the extent to which such a model can represent the complexity of the linguistic practices that characterise the linguistic 'vitality' or 'resilience' within specific neighbourhoods.

34.   The current understanding of the relationship between changes in land use and its implications for influencing peoples' language practices, either negatively or positively over time, especially in the future, is relatively limited. In order to be robust, language impact assessments need to be based upon data that is *reliable* and of *high quality*. As such, it is necessary to continue to rely largely on a proxy measure of language ability – a record of the population's ability to speak Welsh, as expressed in response to a question in the decennial Population Census. While it is essential to be 'objective' and ensure accuracy and replicability, it is also necessary to acknowledge the limitations of indicators such as 'language ability' census data. Consequently, it is also necessary to depend upon the contribution of stakeholders to evaluate the data used in a Risk Assessment and Management Model and relate it to their experience and understanding of local language practices.

35.   Finally, due to its roots in identifying hazards and assessing and managing risk, the model is currently probably more adept at identifying negative rather than positive impacts and opportunities for enhancing benefits. Within the context of assessing the impact of physical developments on the vitality and resilience of the Welsh language - and the need to refine risk assessment and management approaches - this will probably be an ongoing 'work in progress' for the immediate future.

1.6   Summary and Conclusions

36.   This section has reviewed existing WLIA methodologies. The method that is currently widely used by LPAs, *Planning and the Welsh Language: The Way Ahead* (2005), is dated and has its limitations. Based largely on a model that we have been developing for assessing the impact of large, unanticipated developments on the Welsh language, it is proposed that the Council undertakes further assessment on the Carmarthenshire LDP Preferred Strategy's likely impact on the Welsh language within the plan area using an alternative *Welsh Language Resilience Management Framework*. The approach to WLIA methodology contained within this framework is aligned to current risk management approaches and, in our view, provides a suitable, comprehensive, and deliverable method for conducting the assessment. While it is recognised that this risk assessment and management framework is relatively untested, it is nevertheless underpinned by a robust ISO methodology for risk assessment and management.

*   *   *   *   *   *   *

Part 2 - Welsh Language Impact Assessment of the Deposit LDP's Preferred Strategy

2.1   Introduction

1. Part 2 addresses the requirement for a revised Welsh Language High Level Impact Assessment of the likely anticipated impacts of the **revised Growth and Spatial Strategies adopted for the Second Deposit Local Development Plan (rLDP2)**. This has been undertaken and prepared in parallel with the revised Integrated Sustainability Appraisal (ISA) undertaken for rLDP2 and in particular for these strategies.

2. The PCPA 2004 as amended by the PWA 2015 (section 11) confirms the requirement for a Sustainability Appraisal (SA) to include "*an assessment of the likely impacts of the plan on the use of the Welsh Language in the plan area. The purpose of this is to ensure that the <u>scale</u>[12] and <u>location</u> of change set out in the plan supports the Welsh language and ensure appropriate mitigation measures are in place, if required.*"[13]

3. Section 4 of The Development Plans Manual[14] encourages an integrated approach to undertaking a sustainability appraisal of a development plan (see **Figure 2.1**). The sustainability objectives (SO) against which various impacts of the proposed development plan are assessed contain one objective relating to the future health of the Welsh language[15]. This has not changed from the SA adopted at the beginning of the rLDP1 process and for the reasons included in the rLDP1, the SA WLIA, in our view, is not sufficiently robust or SMART[16] for the purposes of a comprehensive Welsh Language Impact Assessment. Whilst recognising that, ideally, the criterion for which impact is to be assessed by the SA and WLIA should be the same we have conducted the WLIA using a different yardstick.

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[12] Our emphasis.

[13] Planning and Compulsory Purchase Act 2004, section 60B (1) (b) and 60B (2) as amended by the Planning (Wales) Act 2015 (section 11).

[14] Welsh Government (March 2020) Development Plans, edition 3.

[15] Encourage growth of the Welsh language and culture.

[16] SMART Specific, Measurable, Achievable, Realistic and Timebound.

Figure 2.1: Development Plans Manual Advice

Integrated Assessment Approach: An Effective and Holistic Approach to Plan Making

4.5 When undertaking an SA, LPAs should consider the value and opportunities for an integrated assessment approach to preparing a development plan. The integration of statutory and key elements such as WBFGA 2015 requirements, Equalities Act, Welsh language, Health Impact Assessment (HIA) and the Environment Act (section 6) (where relevant) into a single Integrated Sustainability Appraisal (ISA) will enable a more transparent, holistic and rounded assessment of the sustainability implications of growth options, objectives, policies and proposals.

4.6 An ISA can maximise efficiencies, avoid duplication, and provide a clear audit trail to communities and plan users on how the range of issues have been considered, and how they have influenced the plan. An ISA approach provides a robust and thorough mechanism to identify issues, assess effects and assist with monitoring in a holistic manner. It will be for each plan making authority to determine whether to integrate the assessments discussed below (not exhaustive) as part of their SA, having regarding to legislative requirements and the key issues of the plan area. **Plan making authorities will need to be clear up front about what elements are being screened into the ISA; i.e. those elements that are relevant and can be considered by the development plan. The ISA should use signposting to clearly reference and highlight the specific legal requirement they are addressing.** The development plan system should not be used to secure objectives which are more appropriately achieved through other legislation or mechanisms.

Source: Welsh Government (2020) Development Plans, ed. 3, Development Plans Manual, Section 4.

4.   A key outcome for the LDP system is *"to support sustainable development and quality places based around the National Sustainable Placemaking Outcomes, aligned with national policy (set out in PPW) integrated with a SA/SEA/HRA, including Welsh Language and the requirements of the WBFGA 2015."*[17]

5.   This assessment is composed of the following elements:
- A review of the background and context for the assessment.

- Referencing the more detailed analysis of the WLIA and SA assessments done as part of the initial deposit version of the revised LDP conducted in 2019.

- Identifying and populating any existing gaps to achieve a Welsh Language High Level Impact Assessment of the likely anticipated impacts of the **Preferred Growth Strategy** using the methodology adopted in Part One.

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[17] Op.cit.

- Identifying and populating any existing gaps to achieve a Welsh Language High Level Impact Assessment of the likely anticipated impacts of the **Preferred Spatial Strategy** using the methodology adopted in Part One.

- Making recommendations of what actions, if any, are needed in order to mitigate any negative impacts of the Preferred Growth and Spatial Strategy.

2.2 The Context

2.2.1 Welsh Government Guidance

6. The Welsh Government's national planning policy for Wales is contained in Planning Policy Wales (Edition 11). **Figure 2.2** below is a reminder of the National Sustainable Placemaking Outcomes set by Welsh Government. Within the outcome of Creating and Sustaining Communities is a requirement that the LDP system "*enables the Welsh language to thrive*".

Figure 2.2: National Sustainable Placemaking Outcomes

7.   Technical Advice Note (TAN) 20, published in October 2017 provides more detailed guidance on how LPA's should consider LDP options in terms of their impact on the Welsh language.

"*LDP options*

3.3 The preferred strategy of the LDP will derive from a series of strategic options. These options will set out potential levels of growth and key locations for growth. LPAs should identify how each option is expected to impact on the use of the Welsh language. Details on how to assess options through the SA can be found in section 6.3 of the LDP Manual".

8.   In relation to assessing the likely impacts of a development plan on the Welsh language, section 4.14 of the Manual summarises the legislative requirements and guidance as follows:[18]

> In summary, LPAs must consider the likely effects of their development plan as part of the SA process and include a statement within the deposit plan on how this has been considered and or addressed within the development plan. The SA process is the mechanism for considering how the scale and location of growth, the vision, objectives, policies and proposals individually and in combination, impact on the Welsh Language. Where evidence indicates a detrimental impact on the use of the Welsh Language the LPA can assess whether the strategy should be amended or mitigation measures should be identified.

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[18] Welsh Government (June 2019) *Consultation on Development Plans Manual edition 3.*

2.2.2 Future Wales – the National Plan 2040

9.   *Future Wales* is the National Development Framework published in March 2021 designed as a planning framework to guide the change and development of Wales over the next two decades.

10. Of immediate relevance to this Impact Assessment are the statements and priorities in the Plan relating to the Welsh language.
     - One of the eleven outcomes the Welsh Government wishes the Plan to achieve is described as:

     "A Wales where people live.... in places with a thriving Welsh language." (Outcome 4)

     "The language will be an embedded consideration in the spatial strategy of all development plans.[19]*"*

     - In relation to the Southwest Wales region:
       - It notes that of the population of over 700,000 there are 147,864 (31.8%) Welsh speakers (a 5.4% increase since 2009).
       - It states: "*It is important that Strategic and local Development Plans consider the relationship between strategic housing, transport, and economic growth and the Welsh language*".
       - It also states: "*Strategic and Local Development Plans should contain settlement hierarchies and growth distribution policies that create the conditions for Welsh to thrive and remain as the community language in the many places where everyday life takes place in Welsh*"[20].

2.2.3 Changes to the Use Classes (UCO) and General Permitted Development (GPDO) Orders

11. In October 2022, Welsh Government announced changes to the above two orders designed as part of measures to tackle the issue of second homes and short – term lets in Wales. The UCO is amended to create two new classes "C3 -Dwellinghouses, used as sole or main residences", "C5 Dwellinghouses, used otherwise than as sole or main residences" and "Class C6 – Short-term Lets". The GPDO is amended to allow permitted changes between C3, C5, and C6 but can be dis-applied within a specific area by an Article 4 Direction made by a local planning authority on the basis of robust local evidence.

2.2.4 Welsh Language Communities Housing Plan

12. In October 2022, as part of the measures to tackle the issue of second homes and short-term lets on Welsh language communities in addition to the planning measures, Welsh Government announced changes to the property and taxation systems. The announcement covers seven areas including various housing market and economic interventions, the establishment/strengthening of cultural ambassadors, the *Economy,*

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[19] Welsh Government (2021) *Future Wales – the National Plan 2040*, page 42.
[20] Ibid. Page 143.

Housing and Welsh Language Roundtable and the *Commission for Welsh Speaking Communities* and measures to research changes to Welsh place names.

13.   Whilst not directly relevant to this Assessment, and whilst the scale of second homes and short-term lets is not, in general, a major issue outside some coastal communities, there is a realistic possibility that the measures may influence the pace and distribution of homes and jobs before the end of the Plan period.

2.3   Carmarthenshire County Council

2.3.1 Welsh Language and Planning Policy

14.   Carmarthenshire County Council adopted the following motion at its full Council meeting on 10th July 2019:

> *"This council believes that the whole of Carmarthenshire is an 'area of linguistic sensitivity and significance' and that the planning system has a crucial role to play in supporting the Welsh language across the county. To this end, we believe that the language should be a Material Planning Consideration in all applications for the development of five or more houses in rural areas and ten or more in urban areas in every community, irrespective of the percentage of Welsh speakers.*
>
> *We maintain that this policy is necessary and justifiable due to:*
>
> - *the need to address the severe and unexpected reduction in the number of Welsh-speakers in Carmarthenshire in the 2011 Census*
> - *being a contribution towards the Welsh Government's target of creating a million Welsh-speakers by 2050*
> - *complying with the Wellbeing of Future Generations Act, in particular "a Wales of Vibrant Culture and Welsh Language: a society that promotes and protects culture, heritage and the Welsh language…"*

15.   This policy was thus adopted late in the process of preparing the First Deposit Replacement Local Development Plan. The Welsh Language development management policy (WL1) has been adapted to reflect the Council's policy.

2.3.1 Welsh Language Promotion Strategy

16.   The Council's long-term vision is "*to make Welsh the main language of the county*".

17.   There are 5 main objectives identified to achieving its aim:
- "*Increase the numbers acquiring basic and further skills in Welsh through the education system and through language transmission in the home.*
- *Increase the confidence of Welsh speakers and therefore the use of Welsh in every sphere of life and encourage and support the county's organisations to make Welsh an increasingly natural medium for their services.*
- *Take purposeful action to positively affect population movements and try to get our young people to settle or re-settle in the county so that the increase in the number of Welsh speakers gained through the education system is not lost. Also, make significant efforts to assimilate newcomers and ensure that new planning*

developments do not have a detrimental effect on the viability of the Welsh language.

- *Target specific geographic areas within the county, either because they offer the potential to develop or because they cause linguistic concern to increase the numbers in those areas who can and do use Welsh.*
- *Language marketing & promotion. Raise the status of Welsh including the benefits of bilingualism and the benefits of bilingual education. And by raising awareness of these benefits, attracting more residents of the county to acquire the language."*

2.3.2 Welsh in Education Strategic Plan (WESP) 2022- 2032

18. Carmarthenshire's 2022-2032 Welsh in Education Strategic Plan (WESP) presents how the Council intends to achieve the Welsh Government's outcomes and targets outlined in their Welsh Medium Education Strategy (WMES). The WMES sets out the Welsh Government's vision for an education and training system that responds in a planned way to the growing demand for Welsh-medium education. The aim is to facilitate an increase in the number of people of all ages able to use the Welsh language with their families, in their communities and in the workplace.

19. Carmarthenshire's WESP is a key vehicle for creating an improved planning system for Welsh-medium education. The WESP will provide the means for the Welsh Government to monitor the way in which the Council responds and contribute to the implementation of the WMES objectives.

20. The Council must provide information and targets against 7 learning areas or strategic outcomes as follows:
- **Outcome 1**- More nursery children / three-year olds receive their education through the medium of Welsh
- **Outcome 2**- More reception class children / five-year olds receive their education through the medium of Welsh
- **Outcome 3**- More children continue to improve their Welsh language skills when transferring from one stage of their statutory education to another
- **Outcome 4**- More learners study for assessed qualifications in Welsh (as a subject) and subjects through the medium of Welsh
- **Outcome 5**- More opportunities for learners to use Welsh in different contexts in school
- **Outcome 6**- An increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN)
- **Outcome 7**- Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh.

21. The Plan details how the Council aims to achieve each of these outcomes over the ten-year period of the Plan and provides a set of targets for each outcome and a pathway for achieving those targets.

22. By September 2032, Carmarthenshire County Council's aspiration is that 75% of all Year 1 pupils will attend Welsh-medium education.

2.4 Summary of the Findings of the Integrated Sustainability Appraisal (ISA)

23. This section reviews of how the impact on the Welsh Language has been considered in the rLDP2 ISA Report[21] It is noted that the ISA report will summarise the findings of the WLIA as part of its assessment of effects on the Welsh Language (ISA11)..

24. Section 2.4 of the revised ISA states the adopted approach to assessing magnitude and significance of effects:

"Given the broad nature of plan proposals and the difficulty of separating other causes of the effects, a qualitative approach is considered to be the most meaningful approach. However, qualitative does not mean 'guessed' and predictions need to be supported by evidence. Once the evidence has been considered, a judgement must be formed on whether or not the predicted effect is considered significant. (Figure 1) provides a framework by which judgements of significance can be made consistently and ensuring prediction, evaluation and mitigation are all incorporated into the appraisal."[22]

25. The ISA Report identifies Welsh Language and Culture as one of 15 sustainability issues each with an objective:

- SA1 Sustainable Development
- SA2 Biodiversity
- SA3 Air Quality
- SA4 Climatic Factors
- SA5 Water
- SA6 Material Assets
- SA7 Soil
- SA8 Cultural Heritage and Historic Environments
- SA9 Landscape
- SA10 Population
- **SA11 The Welsh Language**
- SA12 Health and Well-being
- SA13 Education and Skills
- SA14 Economy

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[21] Carmarthenshire County Council (December 2022) *ISA Revised Deposit Local Development Plan 2018-33*
[22] Carmarthenshire County Council (November 2019) *Carmarthenshire Revised Local Development Plan: Sustainability Appraisal Report of the Deposit LDP.*

- SA15 Social Fabric

26. The ISA Report describes the importance of the County as one of the heartlands of the Welsh language and notes the steep decline in the number and percentage of Welsh speakers over the period from 1991 to 2011, particularly 2001 to 2011 where it had the second largest decline in percentage terms amongst Welsh counties. However, it recognises that, within the context of Welsh Government's strategy and actions led by *Cymraeg 2050,* the picture without the policy intervention of the Second Deposit rLDP is likely to be one of improvement. **Table 2.1** is an extract from Table 5 of the ISA Report summarising the likely baseline position.

Table 2.1: The Business-as-usual Baseline

ISA Objective	Future Baseline	Baseline Summary
ISA 11 Welsh Language	Improving	Carmarthenshire is linguistically sensitive and has the highest number of Welsh speakers out of any County in Wales. Evidence from the Annual Population Survey suggests that the number of persons aged 3 and over in the county who say they can speak Welsh since the time of the last Census in 2011 has grown significantly. Since March 2011 the number (+9,200) and percentage (+9.56%) of persons aged 3 and over who say they can speak Welsh has grown to March 2018 and by a further 3,500 (5.4%) to March 2022. The national target is for one million Welsh speakers by 2050, and there have been notable increases in recent years. However, it is important to recognise localised changes/declines may occur. Inward migration and other factors (including age structure, and other demographics) may negatively impact the proportion of Welsh speakers by challenging language transition, particularly within rural areas in Carmarthenshire which are known strongholds for the Welsh Language. The ability to read, write and understand spoken Welsh fluctuates annually however, since 2014 rates have risen slightly to 45.2%, 42.5%, and 58%, respectively. Coupled with increases in the provision of Welsh medium schools, language immersion is likely to improve rates over the long-term, potentially mitigating the original adverse effect created by inward migration.

27. An ISA Framework is then developed for each issue. It is stated that *"each objective is supported by a number of sub-objectives and accompanying 'decision making criteria' to aid in the assessment process".* **Table 2.2** reproduces the objective and key issue identified for the Welsh Language.

Table 2.2: The Welsh Language Sustainability Objective and Key Issue

11 The Welsh language	
11-1 Encourage growth of the Welsh language and culture	Will the LDP encourage the growth of the Welsh language and culture?

2.4.2 The ISA's Assessment of the Reasonable Alternatives for the Preferred Scale of Growth

28.   The assessment of Strategic Growth Options is contained in section 6.2 of the ISA. This section describes the six new Growth Options developed for the Second Deposit rLDP that were generated and how these were converted to identify the resulting number of dwellings required to deliver the LDP objective. Their ISA score is then assessed against the existing adopted Growth Strategy for rLDP1 (based on PG10 Year/WG2014 projections) LDP dwelling requirement of 589 dwellings per year. **Figure 2.3** reproduces Table 16 from the ISA Report which summarises the score for each Option (see ISA 11 Welsh Language).

Figure 2.3: Testing of Strategic Growth Option against the Sustainability Objective Framework

Table 16 – Summary of the ISA of the rLDP revised Growth Options (see Appendix E for commentary). * in line with WG 2018-based (2018) projection.

Growth Options	ISA1 Sustainable Development	ISA2 Biodiversity	ISA3 Air Quality	ISA4 Climatic Factors	ISA5 Water	ISA6 Material Assets	ISA7 Soil	ISA8 Cultural Heritage	ISA9 Landscape	ISA10 Population	ISA11 Welsh Language	ISA12 Health and Wellbeing	ISA13 Education and Skills	ISA14 Economy	ISA15 Social Fabric
1st Deposit rLDP Preferred Growth Option (re-assessed*)															
PG 10 Year (2019) 8,835 dwellings	+	+/-	-	+/-	+	0	+	+/-	+/-	++	+/-	+/-	+/-	+	+
2nd Deposit rLDP Preferred Growth Options															
WG 2018-based (2018) 4,359 dwellings	+	+/-	+/-	+/-	+	0	+	+/-	+/-	+	+/-	+/-	+/-	+	+/-
"High Population" (2018) 5,670 dwellings	+	+/-	+/-	+/-	+	0	+	+/-	+/-	+	+/-	+/-	+/-	+	+/-
Ten-year trend (2022) 8,822 dwellings	+	+/-	-	+/-	+	0	+	+/-	+/-	++	+/-	+/-	+/-	+	+
Fifteen-year trend (2022) 9,272 dwellings	+/-	-	-	-	+/-	0	+/-	-	-	++	-	+/-	+/-	+	+
Employment-led (2022) 9,933 dwellings	+/-	--	--	-	+/-	-	+/-	-	--	++	--	+/-	+/-	++	+
Rebased principal (2022) 10,461 dwellings	+/-	--	--	-	+/-	-	+/-	-	--	++	--	+/-	+/-	++	+

Source: ibid.

29. Compared to the BAU scenario, the ISA assesses the impact on the Welsh language as having both positive and negative effects. Figure 2.4 reproduces the commentary made within Appendix E the ISA Report.

Figure 2.4: Commentary on ISA of Strategic Growth Ten-Year Trend-Based Projection (assumes requirement of 8,822 dwellings)

ISA11 – Welsh Language	+/-	This level of growth would likely increase in the numbers of young persons and, as a proportion will be Welsh speakers, have positive effects upon the Welsh Language. This would be supported by Carmarthenshire's Welsh in Education Strategic Plan which aims to increase the provision of Welsh-medium education. Whilst these factors are proposed to provide an overall likely positive effect, additional information is needed to determine if this level of growth is likely to lead to a sustainable balance between employment opportunities, inward-mitigation, and the Welsh Language. Nevertheless, reference is made to the WLIA which suggests that this level of growth has the possibility of decreasing the percentage of Welsh speakers.

Source: ISA Report

2.4.3 Our Assessment

30. The commentary assesses that the scale of growth (compared to the BAU Scenario – WG 2018-based of 4,359 dwellings) will result in a greater number of young people being retained in the Plan Area.

31. We concur with the view that there is a realistic possibility that the number and percentage of persons aged 3 and over who can speak Welsh has grown since 2011.

Table 2.4 shows the ability to speak Welsh in Carmarthenshire extracted from the relevant tables of the Annual Population Survey (APS) on Stats Cymru.

Table 2.4: Annual Population Survey – Carmarthenshire change in Welsh Language ability over time

Date of Survey	All aged 3 and over	Yes, can speak Welsh	Percentage	Change (%) 2011-2018	Change (%) 2018 – 2022
March 2011	174,600	81,500	46.7		
March 2018	177,200	90,700	51.2	9.6	
March 2022	176,200	95,200	54.0		5.4

Source: Stats Cymru Annual Population Census – Welsh Language ability

32. **Table 2.4** shows that the number of persons aged 3 and over in the county who say they can speak Welsh since the time of the last Census in 2011. Since March 2011, the number (+9,200) and percentage (+9.56%) of persons aged 3 and over who say they can speak Welsh has grown to March 2018 and by a further 3,500 (5.4%) to March 2022. However, the APS results are sample-based, survey estimates and therefore, subject to variability within confidence levels, particularly at local authority level. The APS estimates of Welsh language ability are historically higher than those produced by the Census.

33. There will be more young people that can speak Welsh as a result of the County's recently adopted Welsh in Education Strategic Plan (2022-2032). The growth within the 3 – 15 age group will in turn produce more young people with bilingual skills. However, whilst the number of young persons (up to 24) able to speak Welsh is likely to grow, this is likely to be offset by changes as a result of net migration, particularly the later age cohorts of the 16 – 64 age group and the 65+ age group. As the more ambitious scales of growth are predicated on there being a higher proportion of older age groups, these are more likely to damp the impact of growth in numbers within the younger age groups.

34. **Table 2.5** summarises our assessment of the impact of the reasonable alternatives considered.

Table 2.5 WLIA Assessment of rLDP2 Growth Options

Growth Option	ISA 11 Welsh Language
PG10	-ve
WG 2018	+/-
WG High Population	+/-
Ten-Year Trend Based	+/-
15-year Trend	-ve
Employment Led	-ve
Retained Principal	-ve

2.5 Our High-level Welsh Language Impact Assessment of the Preferred **Growth** Strategy

35.   This section provides a high-level impact assessment of the likely impacts on Welsh language resilience of the Preferred Growth Strategy.

36.   The revised Preferred Strategy (PS) seeks to deliver an overall population increase of 14,468 additional residents (7.7%), with the requirement for 8,822 new homes (equivalent to 588 new homes per year) and the delivery of a minimum of 3,588 (286 per year 2020 -2033 jobs).

37.   Our starting point for conducting the Assessment was to review the assumptions made about the baseline position.

38.   **Appendix 2.1** presents our analysis of the Welsh Government's projected and trajected number of Welsh speakers aged 3 and over from its 2011 Census baseline or the period up to 2050 and their possible consequences for the number of Welsh speakers aged 3 and over for Carmarthenshire by 2033. In summary, the WG Cymraeg 2050 trajectory is calculated using the WG 2014 principal population projection. Assuming the same assumptions to the situation in Carmarthenshire we posit the following position:

"Applying the same change (22.5%) in the percentage of the population aged 3 and over who speak Welsh to the projected change in the overall percentage figure of Welsh speakers in Carmarthenshire would possibly lead to a growth in the number of Welsh speakers aged 3 and over to 78,048 (*22.5% = 95,608).

Based on the WG14 Principal Variant assumption used in the WG's analysis this would provide an estimated percentage of the population aged 3 and over able to speak Welsh as 52.0%. This compares to 43.9% recorded in the 2011 Census."

39.   The WG 18 Principal projection forecasts the population aged 3+ to be 188,417. This would result in the proportion of the total Carmarthenshire population aged three and over who are able to speak Welsh as 95,608 /188,339 = 50.8%. The effect of this would be a 1.2 percentage point reduction in the proportion of Welsh speakers than would be realised under the WG14 based population trajectory scenario (52.0%).

40.   **Appendix 2.4** presents our analysis of the situation. In summary, our key findings are:

"Analysis of the gross migration figures show that a significant proportion of net migration in terms of Carmarthenshire (in and out migrants) are internal to Wales.

The analysis of the 2011 Census of Population returns for those persons who moved from an address outside the County during the previous twelve months also suggests that a significant proportion (around a third 33%) of in migrants to Carmarthenshire were from households where at least one adult spoke Welsh.

Similarly, around one in six households (15%) from outside Wales had at least one adult who speaks Welsh.

The analysis suggests, that based on the migration rates reported in 2019/20 and the percentages of those who either moved in or out of Carmarthenshire within 12 months

at the time of the Census in March 2011, the net number of Welsh speakers increases by 186 per year. When applied to the remainder of the Plan Period (13 years) this suggests that the number of Welsh speakers could increase by 2,418 as a result of net migration.

Whilst past results are, in themselves, no predictor of future outcomes, the evidence presented does suggest that gross in migration is likely to include a significant proportion of households where at least one adult may be able to speak Welsh and thus provide better foundations to plan for enhancing the resilience and vitality of the Welsh language."

41. Our third piece of analysis then sought to understand the key implications of adopting the Preferred 10YTBP Growth Scenario for the Welsh language baseline trajectory. This is presented in **Appendix 2.5** and summarised here as:

"Based on assumptions about the characteristics of in-migrants from the 2011 Census, the net change in population scenario figures for 2022 10YTB projection over WG18 and the future success rate of Carmarthenshire's Welsh Language Education Strategy, the numbers of Welsh speakers could possibly be higher than the WG Trajectory by:

Total number of Welsh speakers = 95,608 + 5231-3,194+ 439 = 98,084

Percentage of Welsh speakers aged 3+ = 98,084 divided by 196,460 = 49.9%

This suggests a realistic possibility of a decrease of 0.9% percentage points over the WG18 Trajectory scenario (50.8%) and a 0.6% percentage point decrease over the First Deposit rLDP Preferred Strategy (50.5%).

42. It is important to note that 55% of the increase is achieved thorugh the WESP intervention rather than as a result of the Preferred Growth Option, although it is also reasonable to note that policy interventions designed to retain or increase the number of young people are likley to feed into a higher number of school pupils (and post 15 young persons) able to speak Welsh and thus boost the overall proportion.

43. It is also important to note that in recent years a high percentage of in-migrants is the result of re-locations from neighbouring counties and from elsewhere in Wales. The percentage of households where at least one adult and a high proportion of dependent children are likely to be able to speak Welsh, will probably increase over time.

<u>Likelihood</u>

44. In addition to assessing magnitude of impact, the other key aspect of Risk Assessment is determining the likelihood of an event occurring. In this case, the likelihood of the net percentage change in the number of Welsh speakers increasing by, for example, 0.5% is dependant on a number of assumptions. The key assumptions include past experience of the characteristics and changes found on the basis of the previous Plan being realised, particularly in terms of household formations, employment growth and housing land allocation take-up.

45. In terms of realising population and household projections and economic growth, the consistency of realising projections is not particularly good. The evidence of realising land allocations is a little better.

46. The relationship between development land take-up and the proportion of Welsh speakers is poorly understood. The analysis of housing completions between 2001 and 2011[23] and changes in the number of Welsh speakers over the same period does suggest an extremely weak correlation. In fact, the anlaysis of ward areas undertaken by Carmarthenshire County Counil suggests a negative correlation between the steepest decline in Welsh speakers and a low number of housing completions.

47. The 2014 University of Wales Trinity St. David study[24] of the experience of the development of three estates found that around 52% of the 158 families who responded to the survey had members that were able to speak Welsh. It should, however, be noted that only 27% of these reported that Welsh was the main language of the home.

48. In conclusion, therefore, due to the evidence being undeveloped, the likelihood of the above scenario being realised is at present relatively weak.

2.4.6 Scoring the Initial Risk

49. In terms of the scale of likelihood of the magnitude of change (+0.5 percentage points over and above the WG Cymraeg 2050 trajectory) being realised, this is initially scored at +1.

50. In terms of the scale of likelihood of the magnitude of change (-0.9 percentage points below the WG 2018 Principal Population Projection) being realised, this is scored at -1.

51. In terms of the scale of likelihood of the magnitude of change (-0.6 percentage points below the First Deposit Preferred Strategy) being realised, this is scored at -1.

52. As can be seen, all scores predict that the scale of growth relative to the various baselines identified have a relatively small impact with minor negative impacts being scored higher than minor positive impacts.

53. **Figure 2.7** comprises an assessment of the magnitude of the consequence and the likelihood of that consequence.

ISA Score

54. In terms of the ISA scoring system, our assessment is that rLDP2 has a realistic possibility of encouraging and realising an overall growth in the number of Welsh speakers. This is particularly true amongst younger age groups. However, the scale of overall growth in homes and jobs is predicated on the 10-year trend based

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[23] Carmarthenshire LDP (2019) Welsh Language Change and Housing Completions 2001- 2011.

[24] Lewis and Fisher (2014) A study of the possible impact of new developments on Welsh speaking communities in Carmarthenshire, namely three housing estates in Carmarthen, Cross Hands and Llandeilo.

population projection. This assumes recent levels of net migration which is likely to lead to a population with a higher component of older age groups and would thus dampen the influence of a higher proportion of young people able to speak Welsh. Thus, in terms of ISA Scoring Matrix, our view is that it would be a +/- score.

55. All scores are subject to the caveats previously declared on the quality of data available.

Figure 2.7 Welsh Language Impact Assessment of Second Deposit LDP Preferred <u>Growth</u> Strategy

					MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD			
WELSH LANGUAGE RESILIENCE RISK MATRIX **CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN** **PREFERRED <u>GROWTH</u> STRATEGY**			Welsh Language Resilience f(WLR) = NWS + PWS threshold weighted		Major Positive	Minor Positive	Minor Negative	Major Negative
					Increase of 2.5 percentage points or more in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Increase of less than 2.5 percentage points in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of less than 2.5 percentage points in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of 2.5 percentage points or more in the number of percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory
					High	Low	Low	High
	Probability	**Frequency**	**Score**		**2**	**1**	**-1**	**-2**
LIKELIHOOD ↑	Experience shows that growth/decline in the population on this scale will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Previous Development Plan	Highly Likely	4	**8**	**4**	**-4**	**-8**
	Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases	Evidence to show it occurs at least 5 - 7 times out of 10 in the Previous Development Plan	Likely	3	**6**	**3**	**-3**	**-6**
	Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	Possible	2	**4**	**2**	**-2**	**-4**
↑	Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence to show it occurs at least 1 - 2 times out of 10 in the Previous Development Plan	HIghly Unlikely	1	**2**	**1**	**-1**	**-2**

2.4.6 Our High-Level Welsh Language Impact Assessment of the Preferred **Spatial** Strategy

56.   The process of assessing the Welsh Language (WL) Impact of the Preferred Spatial Strategy of the replacement Local Development Plan(rLDP) involved working alongside the ISA assessor to assess six spatial options. This was undertaken as part of the WLIA of the First Deposit rLDP. This is summarised in **Appendix 2.5.**

57.   The ISA assessor has taken the view that there is no need to reassess the option in terms of the relevant ISA Objective (ISA 11) at this stage because the Preferred Spatial Strategy has not changed.

58.   In our Assessment of the First Deposit rLDP, we were of the view that the Preferred Spatial Strategy did not fullly consider how the scale and location of growth, individually and in combination, is likley to impact on the Welsh language but recognised that that this remains difficult to assess because the relationship between development land take-up and the proportion of Welsh speakers is poorly evidenced.

The Impact of the Overall Spatial Strategy

59.   The Preferred Growth strategy, based on the10-YTB Projection, identifies a requirement for 8,882 homes by 2033. In seeking to deliver these homes, the Plan includes an additional uplift "to ensure the delivery of sustainable growth and to overcome any potential unforeseen deliverability issues". A flexibility of 10% through a further 882 homes, is included. This equates to a housing supply of 9,704.

60.   This compares with the uplift of 15% included in rLDP1 which equates to 1,325 further homes and a total supply of 10,160.

61.   The advantages of the revised Preferred Strategy are claimed as including a better reflection of investment and economic opportunities, opportunities for rural areas, and that growth is better orientated to infrastructure capacity, the community's needs, and market demand.

62.   As identified in Strategic Policy SP3 the housing supply includes housing allocations, affordable housing provision (5 units or more), small housing sites (under 5 homes) and windfall housing opportunities.

63.   From a WL impact perspective, the reduction in the uplift from 15% to 10% overall in the Preferred Growth Strategy, together with the effective implementation of Strategic Policy SP3, is more likely to reduce unforeseen distribution of growth on specific locations particularly in communities where the use of the Welsh language is sensitive to change. In our view, Policy WL1 strengthens the Council's ability to ensure that such unanticipated development is screened for adverse impact.

The Impact on Individual Clusters

64.   As with SA methodology in general, our assessment starts by trying to identify a 'business-as-usual' (BAU) position.

65. Whilst there are County level projections produced, there is no sub county data available, and it is therefore more difficult to identify and test the 'Hybrid Option' against what might have been 'business-as-usual'.

66. The existing LDP uses a different Spatial Strategy and whilst it would have been useful to test the position in 2021 against the results of the Census this is not possible until the results are published[25].

67. Our preferred approach is to assume what might be the position by 2033 in the absence of the Preferred Spatial Strategy. We have sought to project what might be the position if the current LDP spatial strategy were continued but on the basis of the BAU position adopted for the Preferred Growth Strategy. This corresponds to Option 1 in the SA which is described as "*the distribution of employment and housing in a manner reflective of their existing scale..*"[26] Based on our calculations of a projected population of 199,631 this would lead to a projected population aged 3 and over of 195,638.

68. This would apportion growth in the number of Welsh speakers (95,608 by 2033) to the six clusters based on their <u>current proportions</u> of the population.

69. In our analysis of the preferred Growth Strategy, based on our assumptions on adopting a target of 75% on the proportion of 3-15 age group Welsh speakers and assumptions on the impact of migration flows on Welsh language household members, we have predicted that this growth option is likely to lead to an increase in the number of Welsh speakers to 98,048.

70. **Table 2.6** compares the allocations of rLDP1 and rLDP2 and assesses their WL impact.

Table 2.6: Comparison of rLDP1 and rLDP2 dwelling allocations by Cluster

Cluster	Estimated Welsh speaker baseline 2018		rLDP1	rLDP2	Difference		Magnitude of Impact
	Numbers	%			Number	%	
Cluster 1	15,597	46.6	1680	1690	+10	0.6	-
Cluster 2	23,344	32.0	3059	2840	-219	7.2	+ve
Cluster 3	24,712	58.4	1306	1267	-39	3.0	-
Cluster 4	6,925	53.8	402	218	-184	45.8	+ve
Cluster 5	4,869	46.8	112	162	+50	44.7	+ve
Cluster 6	4,112	40.2	461	647	+186	40.3	+ve

Source: Authors' own analysis of rLDP1 and rLDP2 allocations

71. We have calculated the effect of the Preferred Spatial Strategy on the population distribution among the six clusters by apportioning the distribution of allocations onto our estimate of the 2018 populations for each cluster.

72. **Table 2.7** shows the results the likely impact on the spatial distribution of Welsh language speakers when comparing the Preferred Spatial Option against the rLDP 1 ("BAU") Spatial Strategy.

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[25] Proposed ONS release date for sub-county levels is currently "early 2023"

[26] Carmarthenshire County Council (December 2018) Sustainability Appraisal of Draft Deposit LDP, section 5.6

Table 2.7 Change in Number and Percentage of Welsh speakers aged 3+ (2018 – 2033) based on Preferred Spatial Strategy

| | Cluster | Baseline 2011 Welsh speakers3+ | Baseline 2018 | 2011- 2018 Increase | 10YTB 2033 Trajectory (Usual Residents 2018+Disaggregation of Population increase) | | |
					Welsh speakers3+ 2033	Percentage Welsh Speaking of Residents 3+	2018 - 2033 Increase
Cluster 1	Carmarthen and its Rural Areas	15191	15597	406	19228	50.9%	3631
Cluster 2	Llanelli a Gwendraeth Isaf	22736	23344	608	28778	35.7%	5434
Cluster 3	Aman a Gwendraeth Uchaf	24069	24712	643	30465	66.3%	5753
Cluster 4	Dyffryn Teifi	6745	6925	180	8537	62.7%	1612
Cluster 5	Tywi Uchaf	4742	4869	127	6003	54.7%	1134
Cluster 6	Western Sir Gâr	4008	4115	107	5073	43.0%	958
Total		77491	79562	2071	98084	49.9%	20593

Source: Authors' own calculations based on rLDP1 and rLDP2 allocations

- In terms of the impact on Cluster 1, this suggests that the number of Welsh speakers would be 3,631 higher in 2033 compared to 2018 under the Preferred Spatial strategy.

- In terms of the impact on Cluster 2, this suggests that the number of Welsh speakers would be 5,434 higher compared to 2018 under the Preferred Spatial strategy.

- In terms of the impact on Cluster 3, this suggests that the number of Welsh speakers would be 5,753 higher compared to 2018 under the Preferred Spatial strategy.

- In terms of the impact on Cluster 4, this suggests that the number of Welsh speakers would be 1,612 higher compared to 2018 under the Preferred Spatial strategy.

- In terms of the impact on Cluster 5, this suggests that the number of Welsh speakers would be 1,134 higher compared to 2018 under the Preferred Spatial strategy.

- In terms of the impact on Cluster 6, this suggests that the number of Welsh speakers would be 958 higher compared to 2018 under the Preferred Spatial strategy.

Table 2.8 shows our calculations of the results of comparing the Preferred (10YTBP) Growth Strategy against the PG 10 2019 Growth Strategy used for rLDP1.

Table 2.8: A comparison by Cluster of the Results of Apportioning Predicted Welsh speakers (rLDP1 vs rLDP2)

Cluster		Preferred growth strategy	Preferred Spatial Strategy rLDP1 (PG 10 2019)		Preferred Spatial Strategy(rLDP2) (10YTB)		Difference	
		Residents Age 3+	Welsh Speakers		Welsh Speakers		No.	% points
Cluster 1	Carmarthen and its Rural Areas	36087	19382	53.7%	19046	52.8%	-336	-0.93
Cluster 2	Llanelli a Gwendraeth Isaf	78664	30890	39.3%	30355	38.6%	-535	-0.68
Cluster 3	Aman a Gwendraeth Uchaf	45611	29826	65.4%	29309	64.3%	-517	-1.13
Cluster 4	Dyffryn Teifi	13875	8442	60.8%	8295	59.8%	-146	-1.05
Cluster 5	Tywi Uchaf	11201	6046	54.0%	5941	53.0%	-105	-0.94
Cluster 6	West Carmarthenshire	11022	5228	47.4%	5138	46.6%	-91	-0.82
Total		196460	99814	50.8%	98084	49.9%	-1730	-0.88

Source: Authors' own calculations

73.   Overall, this suggests that the proportion of Welsh speakers would be 0.9% lower (49.9% compared to 50.8%).

Technical Limitations and Uncertainties

74.   The possible weakness of this approach is that the weighting of each cluster in terms of Welsh language speakers remains the same. As the relative targets of the main components of change (e.g., planned effectiveness of the main driver (WESP for 5–15-year-olds) and distribution of net migration across the clusters is not known at this stage, then this has proved difficult to translate into actual robust figures for each cluster. Therefore, the reliability of the predicted results must be treated with caution.

Likelihood

75.   A discussion of the characteristics of 'likelihood' of a particular level of magnitude happening, and caveats surrounding any assumptions made is discussed earlier in the assessment.

76.   In conclusion, due to the evidence being undeveloped and the evidence supporting the likelihood of the magnitude of the Preferred Spatial Strategy being achieved relatively weak, likelihood is scored as +1.

2.5.4   Scoring the Initial Risk

77.   In terms of the scale of likelihood of the magnitude of change for the Preferred Spatial Strategy for rLDP2 against the current LDP being realised, this is initially scored at +1 using the risk assessment matrix reproduced in **Figure 2.8** overleaf and suggests a

minor positive result. This score comprises an assessment of the magnitude of the consequence and the likelihood of that consequence.

78. In terms of the current LDP in our view this would be scored as MINOR POSITIVE.

79. In terms of the scale of likelihood of the magnitude of change for the Preferred Spatial Strategy for rLDP2 against the Preferred Spatial Strategy adopted for rLDP1, this is assessed as -1.

80. In terms of the ISA Framework, in our view this would be scored as UNCERTAIN because the location of the growth in Welsh speakers at sub-county level is unclear at present.

Figure 2.8 Predicted Risk Score for the Preferred <u>Spatial</u> Strategy

					MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD			
					Major Positive	Minor Positive	Minor Negative	Major Negative
WELSH LANGUAGE RESILIENCE RISK MATRIX **CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN** **PREFERRED <u>SPATIAL</u> STRATEGY**			Welsh Language Resilience f(WLR) = NWS + PWS threshold weighted		Increase of 2.5 percentage points or more in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Increase of less than 2.5 percentage points in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of less than 2.5 percentage points in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of 2.5 percentage points or more in the number of percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory
					High	Low	Low	High
	Probability	**Frequency**		**Score**	**2**	**1**	**-1**	**-2**
LIKELIHOOD	Experience shows that growth/decline in the population on this scale will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Previous Development Plan	Highly Likely	4	8	4	-4	-8
	Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases	Evidence to show it occurs at least 5 - 7 times out of 10 in the Previous Development Plan	Likely	3	6	3	-3	-6
	Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	Possible	2	4	2	-2	-4
	Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence to show it occurs at least 1 - 2 times out of 10 in the Previous Development Plan	Highly Unlikely	1	2	1	-1	-2

2.6 Secondary, Cumulative and Synergistic Effects of the draft Preferred Growth and Spatial Strategies

81. As referred to above, the Development Plans Manual requires LPAs, as part of the ISA process, to consider how the scale and location of growth individually and <u>in combination</u>, impact on the Welsh language.

82. Within our brief, we have confined our examination to a consideration of how the ISA has assessed the secondary, cumulative and synergistic effects on ISA Objective 11 (*Will the LDP encourage the growth of the Welsh Language and Culture?*) .

83. These effects are considered in relation to secondary, cumulative and synergisitc effects on the LDP policies and site allocations.

84. **Table 2.9** reproduces the summary contained in Table 25 of the ISA report on the secondary, cumulative and synergistic effects ofpolicies and allocations.

Table 2.9: Assessment of secondary, cumulative and synergisitc effects of all policeis and site allocations on ISA Objective 11

ISA Objective	Overall Score	Description
ISA11 – Welsh Language	+	In keeping with Welsh Language requirements and Carmarthenshire's linguistic sensitivity, a key consideration of the rLDP is to encourage growth of the Welsh language and culture. This is upheld through dedicated policies SP8 and WL1: Welsh Language and New Developments and is implied through others including PSD1 by requiring development to reflect local context (e.g., cultural characteristics) and PSD9 (advertisements and bilingualism). With considerations made to the number and setting of new development allocations, and additional synergistic influence from requiring proposals to submit a Welsh Language Impact Assessment or Language Action Plan (scale dependent), further development is predicted to cumulatively uphold ISA11 by helping to provide homes for the next generation of Welsh Speakers (encouraging the retention of young people) and provide non-Welsh speaking families (including those from inward migration) access to Welsh-language learning opportunities the long-term, coupled with increases in Welsh-medium schools (and strategic sites). With these requirements in place in conjunction with the sustainable distribution settlement framework (SP3), it is unlikely that the scale of development in both rural and urban communities would discernibly dilute rates of Welsh speaking.

Source: ISA Report, Table 25

85. There appears to be no specific assessment of the secondary, cumulative and synergisitc effects of the preferred growth and spatial strategies.

86. The SA of rLDP1 contains the following conclusion.

> *"Cumulative, secondary, synergistic and indirect effects*
>
> *The plan as a whole has also been appraised for cumulative, synergistic and indirect effects"[27]*

87. From our examination and assessment of the likely cumulative, secondary, synergistic and indirect impacts of the Preferred Growth and Spatial Strategies, we conclude that it is extremely difficult at this stage to separate out what effects other factors such as economic, social and environmental uncertainities; the application of Welsh Government policies towards encouraging the growth in the use of Welsh; the spatial effects of the County's WESP; spatial policies at national and strategic levels and those of neighbouring local planning authorities.

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[27] Op. Cit. Page 48.

2.7   Recommendations for Managing the Risk

88.   To manage the risk identified by this high-level Welsh language impact assessment of Carmarthenshire's Preferred Strategy (both Scale and Distribution of Growth), a Welsh Language Action Plan that sets out the Local Authority and other stakeholders' responses to the risk identified will need to be put in place.

89.   In line with Carmarthenshire's Strategic Policy, SP7: Welsh Language and Culture "*All development proposals subject to WL1, will be expected to identify measures which enhance the interests of the Welsh language and culture*" (SP7, p.1). WL1: Welsh Language and New Developments identifies that such measures could include:

- *"Providing support and funding towards organisations and bodies that provide activities, facilities and education for Welsh speakers and learners, and*

- *Support and funding towards Welsh language classes."* (WL1, p.2)

90.   The appropriate mitigation measures will need to be identified for i) Carmarthenshire as a whole, ii) each of the six cluster areas, and iii) each development of scale. It is expected that, at each level, the mitigating measures will include, as appropriate:

- Promoting and facilitating children's early acquisition and use of Welsh in the home and among close family members and family friendship networks.

- Maximising childcare and non-statutory early education provision through the medium of Welsh.

- Maximising the capacity of statutory education providers to develop the Welsh language awareness, abilities and use of pupils who speak Welsh at home, speak English at home, speak other home languages.

- Maximising the capacity of tertiary and further education providers to develop the Welsh language awareness, abilities and use of young and older adult learners.

- Maximising the opportunities for adults to develop their Welsh language awareness, learn Welsh and to use Welsh in the workplace.

- Promote and support organisations, networks and spaces that provide opportunities for people to interact, socialise and collaborate through the medium of Welsh.

91.   As part of the planning permission process WL1 allows for *"conditions or legal agreements to secure the implementation and enhancement measures proposed within the Action Plan"* (WL1: p.2) to be placed upon developers.

92.   The proposed Welsh Language Action Plan will be agreed by all relevant stakeholders and partners including the Local Authority and the developer and costed in full once the proposed development has been agreed.

93.   An appropriate framework and plan for updating and monitoring the Welsh Language Action Plan will also need to be agreed by stakeholders and partners.

*   *   *   *   *   *   *

Part 3 – Welsh Language Impact Assessment of the Deposit Revised LDP Policies

3.1 Introduction

1. This section considers the likely anticipated impacts which the Second Deposit rLDP's Policies are likely to have upon the Welsh language in Carmarthenshire.

2. The stated SA objective is to "*Encourage growth of the Welsh language and culture*" Planning Policy Wales also expects the land use planning system to "*take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well-being goal*".

3. The raft of policies that support the delivery of Carmarthenshire's strategic objectives and provide high level links and broad conformity with the Well-Being Goals are brought together in the second deposit rLDP under the heading **Prosperous People and Places – To maximise opportunities for people and places in both urban and rural parts of our county**. These strategic policies aim to address:

   "*Socio-economic issues including poverty and deprivation facing both rural and urban parts of our County is recognised within this Plan's "One Carmarthenshire" vision. To this end, this Plan seeks to tackle these issues by maximising opportunities for everyone to maintain or increase their prosperity and sense of wellbeing.*

   *These opportunities include the provision for new homes including affordable homes and jobs, as well as steering new investment and infrastructural priorities, whilst also respecting the County's social fabric, **including the Welsh language, culture** and its sense of place.*"[28]

3.2 Methodology

4. Given the constraints on time and resources, it was agreed that IAITH/BURUM would work iteratively with the Forward Planning Section and focus its efforts on assessing the impacts of the two most relevant policies relating to the Welsh language, namely: **Strategic Policy SP8: Welsh Language and Culture** (previously SP7) and **WL1: Welsh Language and New Developments**.

5. A copy of early drafts of these two policies were provided in early October 2019. These are reproduced in **Figure 3.1** without their reasoned justifications.

Figure 3.1 Draft Welsh Language Strategic and Detailed Policies

> **Strategic Policy – SP 7: Welsh Language and Culture**
> **The Plan supports development proposals which safeguard and promote the interests of the Welsh language and culture in the County. Development proposals which have a detrimental impact on the vitality and viability of the Welsh language and culture will not be permitted unless the impact can be mitigated.**

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[28] 2nd Deposit Revised Carmarthenshire Local Development Plan 2018-2033, p. 97.

> **WL1: Welsh Language and New Developments**
>
> **All development proposals throughout Carmarthenshire will be required to safeguard and promote the Welsh language.**
>
> **Allocated Sites**
>
> **The following development proposals will be required to submit a Language Action Plan, setting out the measures to be taken to safeguard and promote the Welsh language:**
>
> **Residential development for 10 or more homes in the Principal Centres and Service Centres;**
>
> **Residential development for 5 or more homes in the Sustainable Villages; and,**
>
> **Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more.**
>
> **Windfall Sites**
>
> **The following proposals on windfall sites will be required to present a Welsh Language Impact Assessment in support of any planning application:**
>
> **Developments of 10 or more homes in the Principal Centres and Service Centres;**
>
> **Developments of 5 or more homes in the Sustainable Villages; and,**
>
> **Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more**
>
> **Proposals which do not accord with the Plan's housing trajectory (Appendix 9) will be required to provide a phasing plan outlining the timescales for delivering the homes proposed on the site and demonstrate that they would not have a negative impact upon the Welsh language which cannot be mitigated.**
>
> **Residential developments for 10 or more homes on both allocated and windfall sites will be required to positively contribute towards the vitality and viability of Welsh language community groups and Welsh language learning opportunities.**

6. We agreed with the general thrust of these draft policies as they provide appropriate policies that safeguard and support the Welsh language. However, our assessment concludes that the main area that could be strengthened relates to including a form of wording that supports conditions that allow the Welsh language to be more resilient, or indeed, thrive, in addition to avoiding decline and/or maintaining the existing conditions. This supports the general direction of travel in creating conditions for the Welsh language to thrive as required by the Well Being goal.

7. Our suggestions have been the inclusion of word(s) and actions that "enhance" the interests for the Welsh language and culture in the county. **Figure 3.2** reproduces the suggested changes as a result of our assessment. **Appendix 3.1** reproduces the wording of the policies with their reasoned justifications in full.

Figure 3.2 Revised Welsh Language and Culture Policies

Strategic Policy – SP 8: Welsh Language and Culture

The Plan supports development proposals which safeguard, promote <u>and enhance</u> the interests of the Welsh language and culture in the County. Development proposals which have a detrimental impact on the vitality and viability of the Welsh language and culture will not be permitted unless the impact can be mitigated. <u>All development proposals subject to WL1, will be expected to identify measures for that enhance the interests of the Welsh language and culture.</u>

WL1: Welsh Language and New Developments

All development proposals throughout Carmarthenshire will be required to safeguard and promote the Welsh language.

The following development proposals will be required to submit a Language Action Plan, setting out the measures to be taken to safeguard, promote <u>and enhance</u> the Welsh language:

- a) **Residential developments of 5 or more dwellings which will individually or cumulatively provide more than the indicative housing provision set out for the settlement in Policies HOM1 and HOM3; or**
- b) **Residential development of 5 or more dwellings on allocated or windfall sites that do not address evidence of need and demand for housing recorded in a Housing Market Assessment or other relevant local sources of evidence; or**
- c) **Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more or a site area measuring more than 1 hectare.**

Proposals on unexpected windfall sites for large scale housing development or large scale employment development that would lead to a significant workforce flow are required to submit a <u>Welsh Language Impact Assessment which will set out how the proposed development will protect, promote and enhance the Welsh language</u>.

Proposals which do not accord with the Plan's housing trajectory (Appendix 7) will be required to provide a phasing plan outlining the timescales for delivering the homes proposed on the site and demonstrate that they would not have a negative impact upon the Welsh language which cannot be mitigated.

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8.   Other modifications to the Reasoned Justification for the policies were originally suggested in light of the WLIA for rLDP1 and further minor amendments to rLDP2 were discussed and accepted.

3.3   Secondary, Cumulative and Synergistic Effects of the draft Preferred Strategy

9.   As referred to in paragraph 17 of Part 2 above, the new edition of the Development Plans Manual is likley to require LPAs, as part of the SA process, to consider how the (scale and location of growth) individually and <u>in combination</u> impact on the Welsh language.

10.   Within our brief we have confined our examination to a consideration of how the SA has assessed the secondary, cumulative and synergistic effects of the revised Preferred Strategy on SA Topic 11 (*Will the LDP encourage the growth of the Welsh Language and Culture?)*. This analysis is contained in Appendix 6 of the SA[29].

11.   As there appears to be no specific assessment of the secondary, cumulative and synergisitc effects of the preferred strategy, Section 7 provides a summary of the sustainability impacts of the Deposit LDP and provides the following commentary on sumulative, secondary , synergisitc and indirect efffects:

> *"Cumulative, secondary, synergistic and indirect effects*
>
> *The plan as a whole has also been appraised for cumulative, synergistic and indirect effects"[30]*

12.   From our examination and assessment of the likely cumulative, secondary, synergistic and indirect impacts of the Preferred Growth Strategy, we conclude that it is extremely difficult at this stage to separate out any such effects from the influence of other factors such as economic, social and environmental uncertainities, the application of Welsh Government policies towards encouraging the growth of the use of the Welsh language, spatial policies at national, and strategic levels and those of neighbouring local planning authorities.

13.   We score the direct effects of the Preferred Growth Strategy and Preferred Spatial Strategy against the Business-as-Ususal scenarios as **minor negative** and **minor positive** respectively. However, we would score the indirect and other effects as **uncertain** due to the lack of robust evidence which might help weight the influence of the Draft rLDP against other factors.

*   *   *   *   *   *

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[29] Carmarthenshire County Council (November 2019) *Sustainability Appraisal of the Revised LDP Report on the Deposit LDP*

[30] Op. Cit. Page 4

Appendix 1.1: The Status of the Welsh Language in Local Development Plans in Welsh Local Authorities

Table A1-1: The Status of the Welsh Language in Local Development Plans (as reviewed by IAITH/BURUM August 2022)

							Local Development Plans in Wales and Consideration of the Welsh Language (as at August 2022)		
Authority	Development Plan (post 2004)	Period	Year of Adoption	Sepcific Policy on the Welsh Language	Spatial Guidance	Constraints Map with Linguistically Sensitive Areas	Requirements on Developers on Unanticipated Winfdfall Sites		Supplementary Planning Guidance
							Requires WLS	Requires WLIA	
Blaenau Gwent	LDP	2006 - 2021	2012	No	No	No	No	No	No
Brecon Beacons	LDP	2007 - 2022	2013	No	Yes (30%+)	No	No	No	No
Bridgend	LDP	2006 - 2021	2013	No	No	No	No	No	No
Caerphilly	LDP	2006 - 2021	2010	No	No	No	No	No	No
Cardiff	LDP	2006 - 2026	2016	No	No	No	No	No	No
Carmarthenshire	LDP	2006 - 2021	2014	Yes	Yes (60%+)	Yes	No	No	Yes
Ceredigion	LDP	2007 - 2022	2014	No	No	No	No	No	No
Conwy	LDP	2007 - 2022	2013	Yes	Yes (part)	No	Yes (5+)	Yes (20+)	Yes
Denbighshire	LDP	2006 - 2021	2013	No	No	No	Yes (5+)	Yes (20+)	Yes
Eryri	LDP2	2016-2031	2019	Yes	No	No	Yes (5+)	Yes (substantially above 5)	Yes
Fflintshire	UDP	2000 - 2015	2011	Yes	Yes (20%+)	No	Yes (25+)	No	No
Gwynedd	LDP (Joint with Ynys Môn	2011-2026	2017	Yes	No	No	Yes(5+)	Yes (5+)	Yes
Merthyr	LDP2	2016 - 2031	2020	No	No	No	No	No	No
Monmouthshire	LDP	2011 - 2021	2014	No	No	No	No	No	No
Neath Port Talbot	LDP	2011 - 2026	2016	Yes	Yes (25%+)	No	No	Yes	Yes
Newport	LDP	2011 - 2026	2014	No	No	No	No	No	No
Pembrokeshire Coast	LDP2	2016 - 2031	2020	Yes	Yes (19.2%+)	Yes	No	Yes(5+)	No
Pembrokeshire	LDP	2006 - 2021	2013	Yes	Yes	No	No	No	No
Powys	LDP	2011 - 2026	2018	Yes	Yes (25%+)	No	No	Yes (10+)	No
Rhondda Cynon Tâf	LDP	2006 - 2021	2011	No	No	No	No	No	No
Swansea	LDP	2010 - 2025	2019	Yes	Yes (19%+)	Yes	No	Maybe (10+)	No
Torfaen	LDP	2006 - 2021	2013	No	No	No	No	No	No
Vale of Glamorgan	LDP	2011 - 2026	2017	No	No	No	No	No	No
Wrexham	UDP	1996 - 2011	2005	Yes	Yes (20%+)	No	Yes (25+)	No	No
Ynys Môn	LDP(Joint with Gwynedd)	2011-2026	2017	Yes	No	No	Yes(5+)	Yes (5+)	Yes

Appendix 1.2: Welsh Language Resilience Management Framework - The Four Components in Detail

Stage 1: Preparing the Assessment

Who Defines the Impact and its Significance?

1. Setting the boundaries of the assessment is key to ensuring a clear focus on the scope of the assessment and how to reach conclusions based on the results of the assessment.

2. **Stakeholders** should be included in preparing the assessment. Obtaining several perspectives when designing the assessment will promote shared understanding about how the proposal plays a part in affecting the resilience of the Welsh language. It will be a means to build the logic model that makes explicit to everyone what the assumptions, processes, impacts and outputs are. These, in turn, can help identify the data that needs to be gathered to support the process.

3. Involving stakeholders will also be a way of estimating the significance of the risk as well as creating dialogue on the scope of the risk. Conducting and recording the discussion with stakeholders can be a means to withstand any challenges to the robustness of the assessment. For this early dialogue about preparing the assessment, it would be beneficial to prompt the stakeholders to think of the following three components:
   - developing and presenting the model of the relationship in question – the risk of what, to whom, where and when;
   - planning what data is to be collected and the method of data collection
   - initial screening to identify and prioritise significant hazards

4. In any system of measurement, there are acknowledged compromises in data collection between the need for richness, robustness and saliency/usability (relevance and convenience) for specific users. In order to define a measure for Welsh Language Resilience, the most robust and reliable data is the decennial Census of Population data.

5. The Census provides us with information on the number and proportion of the population aged 3 and over who are able to understand, speak, read, and/or write Welsh by competence level and age.

6. In considering the main factors about what data should be collected when conducting a risk assessment, it is recommended, in the context of Welsh language resilience, that a combination be used of **the number and percentage of the population that <u>speaks</u> Welsh** as recorded in the decennial Population Census.

7. This is proposed because speaking Welsh is a key factor when considering the extent to which the use of Welsh is an integral and recognised part of social and community life. The higher the percentage of Welsh speakers, the stronger the language's

8. Research evidence suggests that there are important proportional thresholds for language resilience that a linear weighting approach does not recognise. There is some evidence to suggest that a proportion of around 70% is a significant threshold for the resilience of any minority language.[31] In statistical terms, it can be argued that if a Welsh speaker meets another person, there is at least (0.7% x 0.7%) = 49% chance that this other person will be a Welsh speaker. In such areas, there is a good chance that Welsh would remain the dominant language within the local population.

9. However, the absolute number of speakers can also be an important element, particularly in instances where a minimum number of users is required to justify the provision of a service or when the number of speakers in an area is relatively high but represents a relatively low percentage, due to the size of the population.

10. Consideration needs to be given, therefore, as to which spatial level of data is most useful as a building block in this context - Lower Super Output Areas (LSOA's) or electoral wards. LSOA's are built on contiguous output areas and are designed to be as consistent as possible in terms of population with a minimum of 1,000 people (400 households), a maximum of 3,000 people (1,200 households) and an average (in Wales) of 1,600 people. LSOA's are often the building blocks used for analysing socio-economic data and for developing policy (e.g. Welsh Index of Multiple Deprivation).

11. Census Area Statistics (CAS) Wards are based on Electoral Wards but are subject to similar minimum thresholds as LSOA's. However, they can vary significantly more in size than LSOA's. For example, across Wales, the ward with the minimum population aged 3 and over was Rudbaxton in Pembrokeshire (749) whilst the largest ward was Cathays in Cardiff with a population aged 3 and over of 19,870.

12. As LSOA's are, by their very nature, designed to be standardised it can be more difficult to recognise where clusters of Welsh speakers exist.

13. CAS wards are considered a reasonably "fine grained" basis on which to provide a general picture of linguistic resilience across Wales and individual local authority area. For the purposes of this WLIA of the Carmarthenshire Draft Deposit LDP, we use wards rather than LSOA's for our analysis.

14. **Figure A2-1** identifies important thresholds in the weighting of the percentage of Welsh speakers (PWS) when assigning levels of Welsh language resilience.

Figure A2-1: Definition of language resilience thresholds[32]

PWS threshold weightings	Description and rationale	Resilience score

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[31] For example, arresting the decline in "the number of communities where Welsh is spoken by over 70% of the population" was a key target for the Welsh Government's (2003) National Action Plan for a Bilingual Wales (Welsh Assembly Government 2003). . This is supported by research in several countries, including work undertaken in Ireland (cited in Lewis and Fisher (2014) *A study of the possible impact of new developments on Welsh speaking communities in Carmarthenshire, namely three housing estates in Carmarthen, Cross Hands and Llandeilo*.

[32] Professor D. Demeritt, unpublished working paper for IAITH, 2016.

If PWS>70%, PWS=3	Welsh is the socially dominant language and where the odds on meeting another Welsh speaker in a range of social activities are high. Here also the vitality of the language is strong and linguistic creativity is at its strongest.	Very High
If 50≤PWS<70%, PWS=2	The Welsh language plays a major, if not necessarily dominant, role both within social interaction, and within the educational domain. These communities are more bilingual in nature. Use of Welsh is heard frequently on the street and Welsh is used extensively in the formal and social life of the area. However, it is not necessarily the dominant language.	High
If 20%≤PWS<50%, PWS=1	Such areas contain substantial numbers of Welsh speakers. However, the language is not the predominant language of social interaction in the public sphere and its use is restricted, often to the home and to private interaction among select groups.	Low
If <20% PWS PWS=PWS	Such areas are not Welsh speaking, and Welsh is rarely spoken in public, though there may still be vibrant interest in Welsh language medium education. Consequently, many of the Welsh speakers in such areas are likely to be under 18 and to live in households with no other Welsh speakers.	Very Low

15. For the Carmarthenshire LDP the use of the following equation is recommended for calculating the baseline for assessing the resilience of the Welsh language:

$$f(WLR) = NWS + PWS_{threshold\ weighted}$$

where: 0<WLR≤4

16. If those weightings are applied to PWS, then the possible range of values for WLR runs from 0 to 4. Figure A2-2 illustrates the effect of applying these weightings to the calculation of WLR for Wales at Local Authority level.

Figure A2-2: Welsh Language Resilience (WLR) at Local Authority level (WLR score calculated using *f(WLR) = NWS + PWS* threshold weighted)
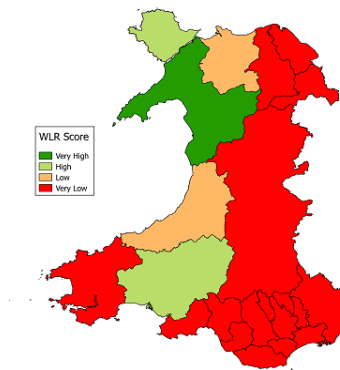
Data Source: Census of Population, Welsh speakers aged 3 and over, 2011

17. Figure A2-3 illustrates these weightings as applied at ward level in Carmarthenshire.

Figure A2-3: Welsh Language Resilience in Carmarthenshire according to Ward calculated using *f(WLR) = NWS + PWS* threshold weighted
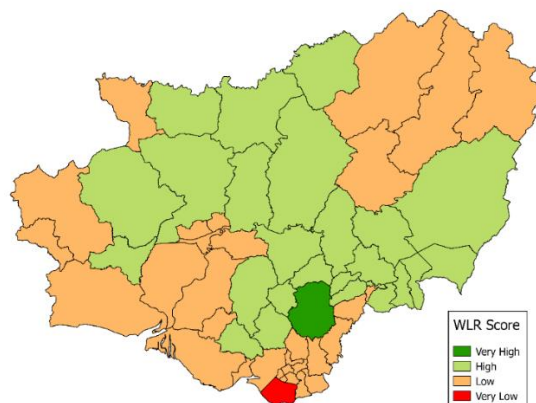
Data Source: Census of Population, Welsh speakers aged 3 and over, 2011

18. Due to the length of time between the results of each census, other data is required to come to an acceptable agreement among stakeholders on the direction and magnitude of change. There is a paucity of reliable quantitative data regarding the Welsh speaker dimension within, for example, the projections for population growth, actual and projected inward and outward migration figures, etc. The Pupil Level Annual School Census data on Welsh language ability is collected annually every January by each local authority. This data can be used to track change in the Welsh language abilities of pupils in maintained and statutory education provision in the 3-4; 5-11; 11-16; and 16-18 age groups. In the absence of other reliable quantitative data, more reliance needs to be placed upon a subjective opinion (whether an expert opinion or not).

Screening and Prioritising the Risks to be Assessed

19.   In preparing for the assessment, screening the Development Plan is necessary in order to identify and define what hazards should be more closely scrutinised and which ones do not need further analysis. This step also provides an opportunity to identify the scale of uncertainty that will be present in the assessment, considering the quality of data available.

Stage 2: Conducting the Risk Assessment

20.   Risk assessment is the formal process of evaluating the consequence(s) of a hazard and their likelihood.[33] This involves asking:
   - What could go wrong?
   - What would the consequences be?
   - How likely will those consequences be?

21.   Undertaking or conducting the Welsh Language Impact Assessment therefore includes the following five steps.
   - What would happen without the local development plan ('intervention')?
   - Identifying the main hazard(s)
   - Assessing the possible impacts/consequences
   - Assessing the likelihood of the impacts/consequences
   - Describing the features of the risk and the uncertainty that comes with the assessment

Step 2.1 Building a Scenario

22.   The first step in the process is to build a scenario of what the vitality / resilience of the Welsh language will be at a given point in the future. It will build on the work carried out to develop the conceptual model and establish the baseline Welsh language resilience indicator.

23.   Scenarios are "plausible descriptions of how the future may develop"[34]. They are based on a logical and consistent collection of assumptions about the main elements and forces that drive the development under consideration.

24.   In considering the impact of any land use on an area's linguistic resilience, it is useful to build a scenario that can consider how a series of factors can influence change in the linguistic position. Planning a scenario will pull together a connected series of possible developments. At this point, consideration should be given to possible total and cumulative effects and their chronology and synchronicity. Building scenarios can help with the process of risk assessment by creating a long-term view of how the linguistic position could evolve. By doing this effectively, it is possible to note critical matters and points that will assist in the process of forming a clear context for future strategies and policies.

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[33] Op. Cit. Defra (2011) Green Leaves III section 1.3
[34] DEFRA (2011) Green Leaves III Section 2.3.3

25. Creating economic and social projections is a complex and difficult at best. Foreseeing personal attributes such as the ability to speak a minoritised language is even more difficult. This should be recognised and made explicit within the assessment.

Step 2.2 Identifying the Key Hazards

26. In the context of a plan designed to grow and manage sustainable development, the key hazards will need to be identified and the spatial impact of these hazards considered. The following factors, among others are likely to be present:
    - significant short-term inward migration to the area associated with major construction that impacts the current linguistic balance in communities within the new development's scope of influence;
    - inward migration to the area by permanent workers and residents that would decrease the percentage of Welsh speakers in an area;
    - local Welsh speakers lacking the skills to apply for the new jobs available, resulting in more outward migration;
    - fewer opportunities to speak Welsh in the workplace and other social domains due to the influence of the inward migration on non-Welsh speakers;
    - more discontent with the area's educational policy in terms of the Welsh-medium education provision; and
    - a decline in the current level of the Welsh-speaking community's resilience.

Step 2.3 *What Would the Consequences Be? (Assessing the Consequences)*

27. The whole range of possible consequences should be considered in the process of identifying and reaching an opinion about the possible consequences or impacts. Some of the key considerations are listed below.
    - Is the impact more relevant to specific age groups?
    - Is the data detailed enough, or is there a need for further research?
    - Is more information needed about the resilience of Welsh-speaking communities?
    - Are the social and community networks that support the use of Welsh easily identified?
    - Were local societies, groups and other stakeholders given enough voice in the process to identify possible consequences and impacts?
    - Are the Local Authority's policies clear enough to enable a response to the risk assessment?
    - Do the impacts/consequences (in terms of scope and scale) seem sensible to the stakeholders?

28. To date, establishing the scale of the hazard to the resilience of the Welsh language is not an objective process based on 'scientific' evidence alone. Instead, it is dependent on making a subjective appraisal of the **scale** or **magnitude** of the hazard, over a given **period**.

29. It will also be important to define the possible consequences in terms of **what** the consequence is, **where** the consequence will occur, **who** will be affected by the consequence and **how** they will be affected and **when** (and/or over **what period of time**) the consequence will occur. The hazards of not acquiring or transferring the

language, or of losing it can happen at different stages in an individual's life.[35] This is also a factor that should be noted when attempting to define the possible consequences.

30. **Table A2-1** presents the thresholds for scoring the magnitude of impact / consequence.

Table A2-1: Scales of magnitude of impact

Major Positive	Minor Positive	Minor Negative	Major Negative
Increase of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Increase of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory
High	Low	Low	High
2	1	-1	-2

Step 2.4 *How Likely Are the Consequences? (Assessing the Likelihood or Probability)*

31. It is possible to define the likelihood of an event as a fraction (or percentage) from 0 to 1. It is not practical to consider every probability and so the common practice is to determine degrees of probability and define their scope.

32. In order to avoid unnecessary confusion, these scales typically vary between 2 and 9 degrees. Where there is not a high level of confidence in defining probability, it is usual to use a scale that is a combination of a percentage band (e.g. once in 10 occurrences, 2–4 times in 10 occurrences, 5–8 times in 10 occurrences, 9 times or more in 10 occurrences) and a qualitative description (e.g. highly unlikely/possible/likely/highly likely). Many probability models favour scales with between 3 and 5 degrees in this situation.

33. At present, the best way forward in the context of the Welsh language is the evidence provided in monitoring previous development plans. For example, this could be based on an analysis of homes or employment sites developed against the resilience of the Welsh language for that area over a similar period. Linguistic resilience will vary according to the percentage of Welsh speakers and their age and this will be a matter for consideration at the time of preparing the assessment.

34. **Table A2-2** provides an example of expressing likelihood.

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[35] For example, see work on linguistic 'mudes' in Pujolar, J. a Gonzalez, I. (2012) 'Linguistic 'mudes' and the de-ethnicization of language choice in Catalonia', *International Journal of Bilingual Education and Bilingualism*, http://dx.doi.org/10.1080/13670050.2012.720664.

Table A2-2: Scales of Likelihood (probability and frequency)

Likelihood of Occurrence	Probability	Frequency	Likelihood	Score
Highly likely	Experience shows that growth/ decline in the population on this scale will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Previous Development Plan	>90%	4
Likely	Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases of similar developments	Evidence to show it occurs at least 5 - 7 times out of 10 in the Previous Development Plan	>50<89.9	3
Possible	Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	>20<49.9%	2
Highly unlikely	Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	<10%	1

Formulating the Impact Description (Combining Consequences and Likelihood)

35. The analysis is then used to describe the risk (being a combination of the consequence and the likelihood of the consequence) and to record the uncertainty associated with the assessment.

36. Based on the scores in the risk matrix, a table can be constructed to give an assessment of the general impact.

37. Within the range of possible impacts, it should be possible to describe the likelihood of the impact occurring in terms of frequency or probability. Assessing **probability** with a degree of certainty or consensus is important. Certainty and objectivity can be strengthened through dialogue with stakeholders and partners to ensure a consensus that is as robust as possible. Different interpretations should be addressed by holding further discussions and possibly seeking further data or more dependable evidence.

38. When considering the likelihood, it will also be important to scrutinise the original plan and the options offered, to form an opinion about the options most likely to be realised. The difference between the probability of the level of the impact and the general likelihood of the impact occurring should also be kept in mind. This is important in measuring risk using the risk assessment matrix. In coming to a decision, consideration will also need to be given to the resilience or the fragility of the area facing the hazard.

Step 2.5 Describing Risk and Uncertainty

39.   Although there are many ways to describe risk, the model we recommend using is well-known in many other fields and is a variation of what is known as the 'Risk Matrix' or 'Heat Map'. The risk matrix combines the two dimensions of impact and likelihood described in steps 2.3 and 2.4. The recommended Risk Matrix is shown overleaf in **Figure A2-4.**

40.   The score is the likelihood of a specific level of impact occurring as a result of the development (direct impact, gradual impacts over time or indirect impacts). The score recorded must be a **combination** of i) the level of impact **and** ii) likelihood of the impact occurring.

Figure A2-4: Recommended Welsh Language Risk Assessment Matrix

WELSH LANGUAGE RESILIENCE RISK MATRIX CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN			Welsh Language Resilience f(WLR) = NWS + PWS threshold weighted	MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD			
				Major Positive	Minor Positive	Minor Negative	Major Negative
				Increase of 2.5 percentage points or more in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Increase of less than 2.5 percentage points in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of less than 2.5 percentage points in the percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of 2.5 percentage points or more in the number of percentage of projected Welsh speakers in the Plan Area aged three and over above the trajectory
				High	Low	Low	High
	Probability	Frequency	Score	2	1	-1	-2
LIKELIHOOD	Experience shows that growth/decline in the population on this scale will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Previous Development Plan	Highly Likely 4	8	4	-4	-8
	Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases	Evidence to show it occurs at least 5 - 7 times out of 10 in the Previous Development Plan	Likely 3	6	3	-3	-6
	Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	Possible 2	4	2	-2	-4
	Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence to show it occurs at least 1 - 2 times out of 10 in the Previous Development Plan	HIghly Unlikely 1	2	1	-1	-2

Stage 3: Appraising the Risk Management Options

41. Risk management frameworks typically identify five strategic options, as follows:
     - **Accept/ Tolerate** the risk by not intervening (e.g. if it is not possible to control it or the cost of addressing it is too high).
     - **Mitigate the impacts** (e.g. by strengthening or investing in infrastructure to support the resilience of the Welsh language).
     - **Take advantage of opportunities** that arise from the risk to create new opportunities and enhance benefits
     - **Transfer the risk** (e.g. another organisation takes the burden of addressing the risk).
     - **Terminate** the source of the risk where possible.

Figure A2-5: Identifying the preferred strategy for managing risks and benefits[36]
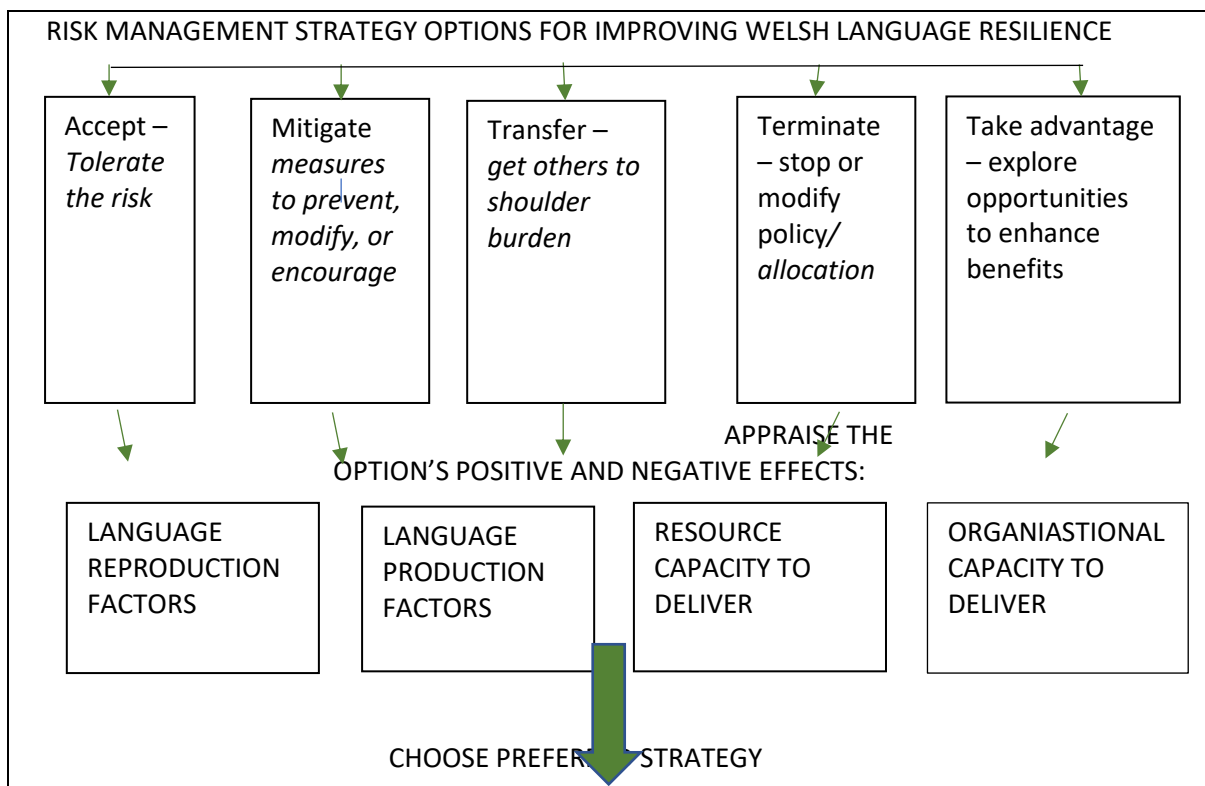
Step 3.1 Evaluating the Impact on Welsh Language Reproduction Factors

42. The home is the principal domain where Welsh speakers are 'reproduced'. In 2011, in households where both parents speak Welsh the level of language reproduction was 80%[37]. In households with one Welsh-speaking parent, Welsh language reproduction was around 40%.[38] Research shows that children who are socialised in Welsh in the home generally continue to speak Welsh and transfer the language to their own children. Consequently, safeguarding those settings where Welsh language socialisation in the home is thriving is key to the vitality and resilience of the Welsh language. The impact of a development on language reproduction factors will need to be evaluated by considering the likely impacts on the following aspects:

- Levels of language 'reproduction' in the home

    o the number of children born into families where both parents can speak Welsh and use the language with their children;
    o the number of children born into families where only one parent speaks Welsh;
    o to what extent, if any, is the language of the home becoming increasingly bilingual/English/ other language-medium;
    o the availability of Welsh-medium childcare provision in the area; and
    o the availability of Welsh-medium and bilingual education provision in the area.

- Community Welsh language resilience

    o to what extent, if any, is the status of Welsh decreasing due to a decline in the number of speakers as a percentage of the local population;
    o to what extent, if any, are fewer Welsh community groups and societies flourishing locally;
    o to what extent, if any, will people's daily use of Welsh decrease;
    o to what extent, if any, will the resilience of Welsh as a language of daily interaction decrease;
    o to what extent, if any, will the use of Welsh retreat to more limited domains and lack creative freshness.

Step 3.2 Evaluating Impact on Welsh Language Production Factors

43. Education is the principal domain where new speakers of Welsh are 'produced'. Around two thirds of children in Wales learn Welsh at school through Welsh-medium and bilingual education. The education system and education policies as these are

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[37] Census data 2011.
[38] Census data 2011.

formulated and implemented at both national and local authority levels are consequently key to the vitality and resilience of the Welsh language. Consideration must, therefore, be given to the local availability of:

- Welsh-medium pre-school provision (maintained and non-maintained);
- full statutory education through the medium of Welsh;
- follow-on levels in Welsh education/skills and training.

44. Outside the education system, other factors ensure the vitality and resilience of Welsh by giving people the opportunity to use the language in their personal lives and at work. The impact of a development on language production factors will need to be evaluated by considering the likely impact on:

- the use of Welsh in the workplace (across all local economy sectors);
- the use of Welsh among various socio-economic groups;
- social and community activity through the medium of Welsh.

45. Other factors that need to be taken into consideration regarding the vitality and resilience of the Welsh language are the levels of mobility within communities and the patterns of inward and outward migration that happen during some key life stages. Specific attention should be given to:
- outward migration rates (especially among the 16 – 30 age group); and
- inward migration rates (especially among the 31 – 45 age group).

46. Furthermore, many other aspects relating to maintaining the local resilience of the Welsh language should be identified. These include:
- to what extent, if any, is there questioning of the local authority's language policy in terms of the provision of education that makes significant use of Welsh as a teaching medium?
- to what extent, if any, is there an increase in the number of children attending school who cannot speak Welsh?
- to what extent, if any, is there a decrease in fluency levels among speakers of Welsh as a first language?
- to what extent, if any, is there insufficient take-up of Welsh-medium courses to make courses for the 14+ age group viable, resulting in a lack of follow-on to the workplace?
- to what extent, if any, are the opportunities of continuing 'follow on' Welsh-medium education in schools and colleges decreasing?
- to what extent, if any, are the numbers of adults learning Welsh low?
- to what extent, if any, are there negative attitudes towards Welsh with Welsh being seen either as a language for the 'elite' or as an 'old fashioned' language?
- to what extent are employers seeking Welsh language skills for their workforce and promoting the use of Welsh in the workplace?

Step 3.3 Evaluating the Resource Capacity for Implementing the Risk Assessment

47. In evaluating the capacity to implement the risk assessment, the following should be given consideration:

- what will the LA and other stakeholders' role be?
- will additional resources be offered in order to deal with one of the steps that could arise from the risk assessment?
- how will the risk be divided among the parties?
- will enough capacity to implement the risk assessment be available?

Step 3.4 Evaluating Organisational Capacity for Implementation

48. This step involves identifying what sort of assistance could be made available from:

- the local authority;
- the Welsh Government;
- the UK Government; and
- Third Sector bodies.

Step 3.5 Choosing the Preferred Option

49. When formulating the preferred strategy, a decision should be reached based on:
    - a consensus between the LA and all relevant stakeholders; and
    - a process of analysis based on several criteria that will lead to a decision.
50. It is common practice to make use of Multi Criteria Analysis (MCA)[39] when making decisions about what path to choose. MCA offers a practical way of comparing and prioritising decision-making options where there are multiple criteria and different levels of risk and uncertainty. MCA is a process of evaluating decisions by using a performance matrix that includes criteria to weigh up the options in question with the aim of identifying the order of the options from the most favoured to the least favoured. It is expected that MCA will be required in the process of choosing the preferred option.

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[39] Department of Communities and Local Government (DCLG) (2009*): Multi Criteria Analysis – a manual.*

Stage 4: Formulating a Welsh Language Resilience Mitigation and Enhancement Action Plan

Step 4.1: Identifying the Appropriate Combination of Responses

51.   In responding to the risk assessment, careful consideration must be given to which strategies for managing the risk and benefits to the resilience of the Welsh language should be considered. Whichever strategy is adopted, there will remain an element of risk ('residual' risk). As well as taking steps to implement the preferred strategy, a plan for monitoring and managing the residual risk will need to be included.

Step 4.2 Formulating a Reporting/Monitoring Strategy

52.   The Local Authority will be responsible for formulating a reporting and monitoring strategy in order to track the impact of the LDP on the resilience of the Welsh language over the course of the plan. This strategy will identify what role the local authority and other key stakeholders / partners will have in the implementation, monitoring and the periodic reassessment of risk.

Mitigation and Enhancement Measures

53.   In formulating an action plan following the risk assessment, it will become clear where necessary mitigation and enhancement measures are needed. Any mitigation and enhancement measures will be introduced in order to promote the positive impacts of the LDP. This will mean that the mitigation and enhancement measures and targets are clear and understood at the beginning of the plan. There will be an expectation that the mitigation and enhancement measures are fully costed once the final LDP has been agreed. This will ensure a general awareness of the risks, the benefits and the opportunities that may arise from the plan.

Step 4.3 Producing the Proposed Mitigation and Enhancement Action Plan

54.   The proposed mitigation and enhancement action plan will be agreed upon based on consensus. The Local Authority, in consultation with its key stakeholders and partners will agree the structure and content of the action plan and it will be updated in line with the timetable that the Local Authority and its stakeholders/partners agree upon.

Monitoring the Mitigation and Enhancement Action Plan

55.   The Local Authority will need to monitor and update the mitigation and enhancement action plan. The Local Authority should ensure that the data that is used to monitor the impact of the LDP is current so that it is possible to update the mitigation and enhancement action plan as needed. After conducting the initial risk assessment of the LDP on the resilience of the Welsh language within the authority, it will be necessary to review and reassess the linguistic situation regularly over the course of the plan to see if the situation has changed in any way.

*   *   *   *   *   *   *

Appendix 2.1: Establishing the baseline for the number and percentage of Welsh speakers in Carmarthenshire by 2033

Acknowledgements

The demographic statistics used in this appendix have been derived from data supplied by Edge Analytics from their Addendum produced in September 2019 and from the generation of additional tables on gross internal migration produced in October 2019. These in turn derive from the Office for National Statistics licensed under the Open Government Licence v.3.0.

IAITH/BURUM are grateful for the support and co-operation of Carmarthenshire County Council and Edge Analytics in making these available for analysis.

Introduction

1.   As part of the assessment of the likely impact of the LPD Preferred Strategy on the Welsh language, the methodology requires the development of a baseline (or 'business-as-usual') model of what the position might be in 2033 (the end of the Plan period) without the policy intervention of the Plan's Preferred Strategy.

2.   This is not easy to establish because, notwithstanding the problematic field of population projections and trajectories, forecasting future language transmission, acquisition, use, and loss is an extremely difficult and complex field, made even harder by trying to model the impact of policy interventions.

Approach

3.   As a first stage in the development of the baseline, IAITH/BURUM have sought to understand Welsh Government's (WG) latest trajectory for how it might achieve its aspiration of achieving a million Welsh speakers in Wales by 2050 and its implications for what might be Carmarthenshire County's position in 2033[40].

4.   As a precursor to the analysis and discussion, it is important to re-emphasize the important differences between a <u>projection</u> and a <u>trajectory</u>.

5.   A **projection** in this context is defined as "the number of Welsh speakers that is predicted if the current patterns and trends regarding the Welsh language and the population continue until 2050."[41]   A **trajectory** in this context is defined as "the number of Welsh speakers estimated based on the projection as well as a number of

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[40] Welsh Government Statistics for Wales (June 2017) *Technical report: Projection and trajectory for the number of Welsh speakers aged three and over, 2011 to 2050.*

[41] Ibid. p2.

assumptions in relation to the aims of the WG strategy to reach the target of a million Welsh speakers by 2050."[42]

Welsh Language Speaker Projections

6. The data used for the projection contained in the report was based on the following three sources:
    - ONS mid-year population estimates by age for the period 2011 to 2013;
    - ONS national population projections by age for period 2014 to 2050;
    - data about Welsh language ability by age from the 2011 Census.

7. The projection is based on the conceptual model devised by Sankoff (2008)[43] and broadly assumes that the percentage of Welsh speakers in one age group in one year will be equal to the percentage in the age group in the previous year with adaptations on assumptions made about language acquisition by children.

8. **Figure A1.1-1** and **Table A1.1-1** present WG projections for the growth in the number of Welsh speakers aged three and over during the period 2011 to 2050. As stated previously, care needs to be taken as they are based on a set of assumptions about trends, trends that will possibly/probably change over time.

Figure A1.1-1: WG projected numbers of Welsh speakers aged three and over, 2011 to 2050
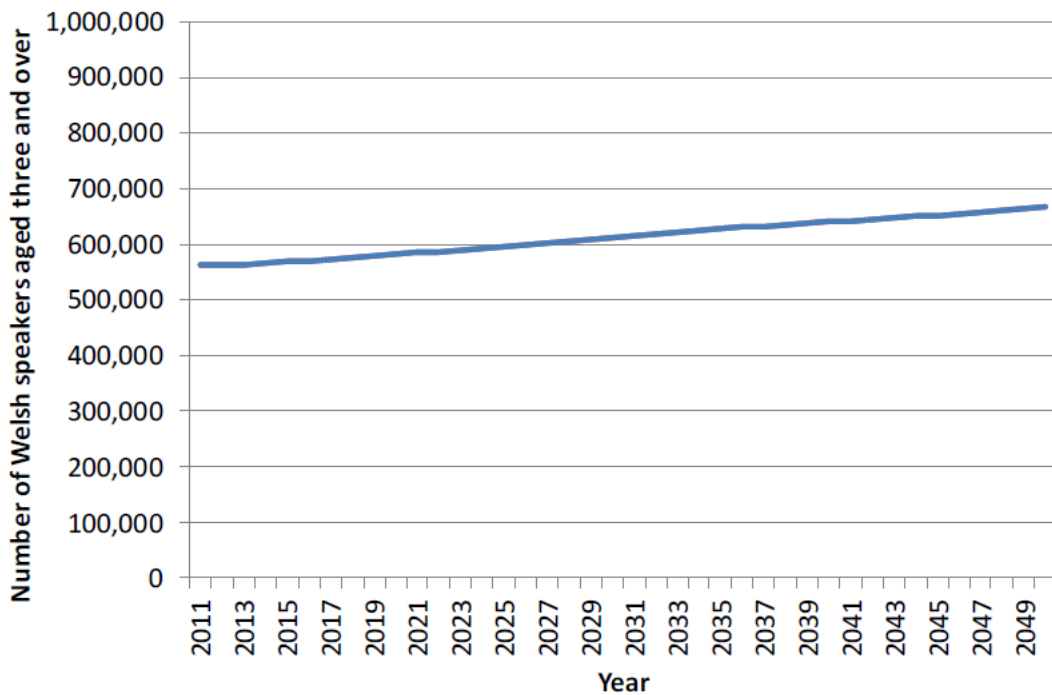
Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit. Chart 2, p. 5.

Table A1.1-1:WG projected numbers and percentages of Welsh speakers aged three and over at specific periods up to 2050

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[42] Ibid. p7.

[43] Sankoff, D. 2008. 'How to predict the evolution of a bilingual community' in Meyerhoff, M. a Nagy, N. (eds.) Social Lives in Language – Sociolinguistics and Multilingual Speech Communities Celebrating the Work of Gillian Sankoff. Edinburgh University/ Toronto University.

Year	Number	Percentage
2011	562,000	19
2017	570,000	19
2021	580,000	19
2026	600,000	19
2031	610,000	20
2036	630,000	20
2041	640,000	20
2046	650,000	20
2050	670,000	21

Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit., Table 1, p.5.

9. The more detailed background tables[44] show a projected number of Welsh speakers aged three and over as reaching 621,000 by 2033 which suggests an increase of a little under 50,000 by 2033 (+10.5%).

10. Although not directly shown in the statistics, the WG 2014 based projections estimated a population aged three and over for Wales of 3,153,560 giving a percentage figure of 19.7% (rounded up to 20% in Table A1 above) for Welsh speakers.

11. The projected figure for Carmarthenshire's total population for 2033 using the WG 2014 projection is 189,317. The County's population aged three and over is projected to be 183,937. The number of persons aged 3 and over in 2011 able to speak Welsh was 78,048.

12. Applying the same change (10.5%) over the period 2011 – 2033 in the percentage of the overall population of Wales aged three and over who speak Welsh to the projected change in the overall percentage figure for Welsh speakers aged three and over in Carmarthenshire would lead to a growth in number of 78,048 *10.5% = 86,243.

13. This would provide an estimated percentage of the population aged 3 and over able to speak Welsh as 47.0% by 2033. This compares to 43.9% recorded in the 2011 Census.

14. The WG 2016 based projection revises the total population aged three and over to 3,142,564. The percentages of Welsh speakers produced in the Welsh Government data presented in **Figure A1.1** and **Table A1.1** above will not be updated until after the results of the 2021 Census are known but is expected to remain the same or close to this figure.

A possible Welsh language speaker Trajectory

15. The WG's trajectory has been calculated building upon the WG 2014 projection produced above as a baseline and using four main assumptions based on the policy aims of the strategy:
    - Welsh language transmission at home.
    - learning Welsh in school.
    - learning Welsh through Welsh for Adults; and

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[44] This data is available at https://statswales.gov.wales/Catalogue/Welsh-Language.

- improved continuation of Welsh-speaking ability post-16.

16. **Figure A1.1-2** and **Table A1.1-2** are reproduced from the WG report.

Figure A1.1-2: WG projection and trajectory for the number of Welsh speakers aged three and over in Wales, 2011 to 2050
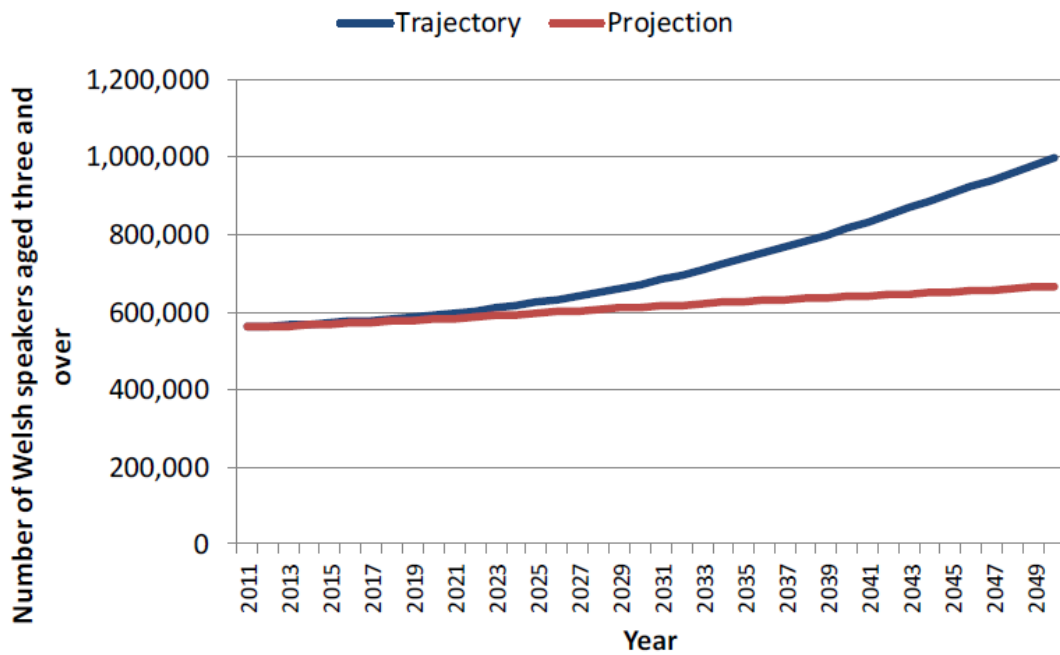
Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit. Chart 6, p. 10.

17. The more detailed background tables[45] show that the trajectory estimated number of Welsh speakers aged three and over as 710,000 by 2033. The WG 2014 based projection aged 3 and over for Wales of 3,153,560 gives a percentage figure of 22.5%.

Table A1.1-2: Numbers and percentages of Welsh speakers aged three and over at specific periods up to 2050 according to WG trajectory

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[45] This data is available at https://statswales.gov.wales/Catalogue/Welsh-Language.

Year	Number	Percentage
2011	562,000	19
2017	580,000	19
2021	600,000	20
2026	630,000	20
2031	680,000	22
2036	750,000	24
2041	830,000	26
2046	920,000	29
2050	1,000,000	31

Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit., Table 2, p 11.

18. Applying the same change (22.5%) in the percentage of the population aged 3 and over who speak Welsh to the projected change in the overall percentage figure of Welsh speakers in Carmarthenshire would possibly lead to a growth in the number of Welsh speakers aged 3 and over to 78,048 *22.5% = 95,608.

19. This would provide an estimated percentage of the population aged 3 and over able to speak Welsh as 52.0%. This compares to 43.9% recorded in the 2011 Census. **Figure A1.1-3** shows the trajectory of the growth in numbers of Welsh speakers in Carmarthenshire based on the overall trajectory for Wales.

Figure A1.1-3 Estimated trajectory for growth in Welsh speakers in Carmarthenshire by 2033
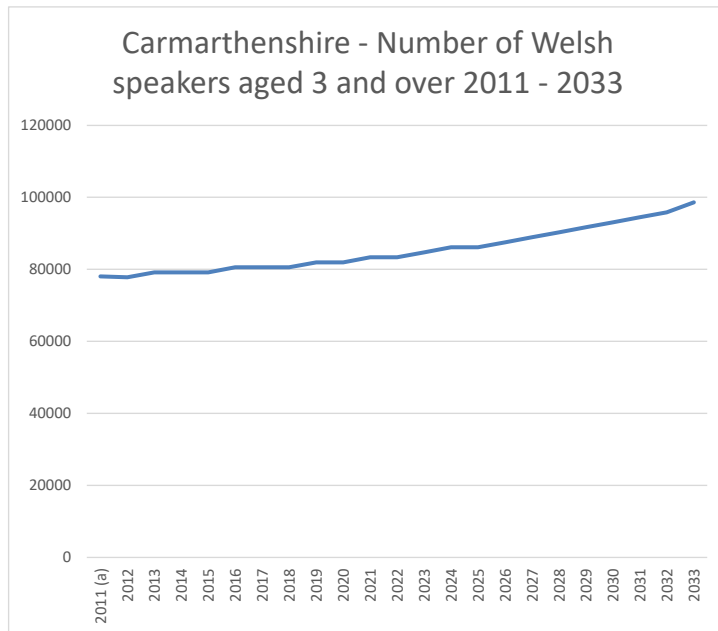
(a) 2011 data is based on the numbers from the 2011 Census.

Limitations

20. A note of caution needs to be reemphasised. The above assumes that the *Cymraeg 2050: a million Welsh* speakers strategy outcomes are apportioned equally across Wales. It is understood that, at present Welsh Government, does not intend to

produce spatial trajectories or targets for regions and each individual local authority. In the absence of such trajectories, the assumption of equal impact across Wales is the best working 'guesstimate'.

<p style="text-align:center">*   *   *   *   *   *   *</p>

Appendix 2.2: Gross Migration 2019-20 and Implications for the WLIA of the LDP Preferred Growth Strategy

Introduction

1. The 2nd Deposit LDP's draft Preferred Strategy (PS) bases its approach on a population projection of 14,468, a housing requirement figure of 8,882 homes (average of +588 pa.), and a jobs per annum figure of 276[46].

2. The main Components of calculating annual population change used in modelling population projections are births, deaths, net internal UK migration and net international migration. All models assume that Carmarthenshire will lose population due to natural change (i.e., annual deaths will be greater than annual births) and make a small increase in international migration (around 210 per year). The PS is thus predicated in the main on the assumptions made about current rates of net internal migration as the main driver of population change.

3. We were interested, therefore, to try and get a better understanding of whether and how net internal migration assumptions, as the main driver of population, household and dwelling growth would have any implications for the resilience of the Welsh language.

4. As part of the further analysis of net migration, Edge Analytics (EA) provided IAITH/BURUM with summary tables based on the raw data on gross internal migration figures for Carmarthenshire for the year 2019/20.

5. For the purposes of this exercise the data was analysed as follows:

   - gross inward and outward migration by age cohorts from/to other parts of Wales by region.[47]
   - gross inward and outward migration by age cohorts from/to other areas of the UK outside Wales.

6. The data provided was sifted and analysed according to age cohorts considered to be of interest to analysis regarding the resilience of the Welsh language (under 3 years old; aged 3 to 15; aged 16 – 29; aged 30 – 44; aged 45 – 60; aged 60+).

7. Data on gender was not requested as it was not considered vital to an understanding of the patterns and trends of internal migration for the purpose of this project.

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[46] Based on Turley (October 2022) *Carmarthenshire Housing and Economic Growth Report.*

[47] Mid and South West Wales Strategic Plan regions remain combined in the StatsWales reports.

8.   **Table A2.2-1** summarises the data.

Table A2.2-1: 2017/18 Gross and Net Migration figures by Age Group and Geography

Age Group	Rest of Mid & South West Wales			South East Wales			North Wales			Total Wales(ex. Carms.)				UK Outside Wales		
	In	Out	Net	In	Out	Net	In	Out	Net	In	Out	Net		In	Out	Net
0–2	75	80	-5	27	18	9	3	1	2	105	99	6		60	33	27
3–15	328	285	42	76	54	22	10	6	4	414	345	69		237	112	125
16–29	787	696	92	532	490	42	49	38	12	1,369	1,223	146		960	808	152
30–44	528	476	52	199	161	38	16	11	5	743	649	94		492	314	178
45–59	406	322	83	131	73	58	14	5	9	550	400	150		560	222	338
60+	457	255	202	119	81	38	15	17	-2	591	352	239		528	290	238
Total	**2,581**	**2,114**	**467**	**1,084**	**877**	**207**	**107**	**77**	**30**	**3,772**	**3,068**	**703**		**2,837**	**1,779**	**1,059**

Source: adaptation of Data and Table by Edge Analytics (November 2022)

Key Findings

9.   The following summarises the key findings from analysing the EA figures:

Migration from Carmarthenshire

- A total of 4,847 persons moved <u>from</u> the County during 2019/20.

- This compares to 5,672 persons who moved <u>from</u> the County during 2017/18 (a reduction of 14.5%).

- Of the 2019/20 total, 3,068 (63.3%) moved to <u>other parts of Wales</u> and 1,779 (36.7%) moved elsewhere <u>outside Wales</u>.

- Of the 3,068 who moved to other parts of Wales,

   o   2,114 (69%) moved to other parts of the Mid and West Wales Region.

   o   877 (29%) moved to the Southeast Region; and

   o   77 (2%) moved to the North Wales Region.

10.   The above summary suggests that, compared to the results for 2017/8, not only has there been a reduction in the overall number of persons (gross out-migration) leaving the county, but more (almost 70%) of those moving out of the county are being retained within the wider mid and west Wales region.

Migration to Carmarthenshire

- A total of 6,609 persons moved <u>to</u> Carmarthenshire during 2019/20.

- This compares to 7,241 persons who moved <u>to</u> the county during 2017/18 (a reduction of 8.7%).

- Of the 2019/20 total, 3,772(57%) moved to the County from <u>other parts of Wales</u> and 2,837 (43%) moved from <u>elsewhere outside Wales</u>.

- Of the 3,772 who moved from other parts of Wales:

   o   2,581 (68%) moved to Carmarthenshire <u>from other parts of the Mid and West Wales Region</u>.

- o 1,084 (29%) moved <u>from the Southeast Region</u>; and

- o 107 (3%) moved from the North Wales Region.

11. This suggests that, compared to the results for 2017/8, whilst there has been a small annual reduction in the total number of persons moving into the county there appears to be no significant variation over the two years in the geographical source of the movements.

12. **Table A2.2-2** provides an analysis of the data by age cohort for the base year for the rLDP (2017/18) and the most recent figures provided by Edge Analytics for 2019/20.

Table A2.2-2: Gross In and Out Migration by Age Group

Age Group	Totals by Age Group (2019/20)					Age Group	Totals by Age Group(2017/18)				
	In	%	Out	%			In	%	Out	%	
0–2	165	2%	132	3%		0–2	248	3%	159	3%	
3–15	651	10%	457	9%		3–15	864	12%	482	8%	
16–29	2,329	35%	2,031	42%		16–29	2,125	29%	2,458	43%	
30–44	1,235	19%	963	20%		30–44	1,478	20%	1,058	19%	
45–59	1,110	17%	622	13%		45–59	1,371	19%	750	13%	
60+	1,119	17%	642	13%		60+	1,159	16%	785	14%	
Total	6,609	100%	4,847	100%		Total	7,245	100%	5,692	100%	

13. A comparison of figures for 2019/20 and 2017/18 shows that while both overall in-migration and out-migration levels are lower in 2019/20, and out-migration proportions are broadly similar across all age cohorts, there are indications of a possible significant shift between age cohorts of in-migrants. The proportion of in-migrants within the 16 – 29 age cohort has increased from 29% to 35% (in the main at the expense of 3-15 and 45 – 59 age cohorts).

14. When age cohorts are further analysed by geography, the five largest cohorts to migrate <u>from</u> Carmarthenshire were:

- o 16 – 29 age group to areas <u>outside Wales</u> (808).
- o 16 – 29 age group to <u>other parts of the Mid and West Wales</u> (696).
- o 16 – 29 age group to <u>the Southeast Region</u> (490).
- o 30 – 44 age group to <u>other parts of the Mid and West Wales</u> (476).
- o 45 – 59 age group to <u>other parts of the Mid and West Wales</u> (322).

15. The six largest cohorts to migrate <u>to</u> Carmarthenshire were:

- o 16 – 29 age group from areas <u>outside Wales</u> (960);
- o 16 – 29 age group from <u>other parts of the Mid and West Wales</u> (787);
- o 45 – 59 age group from <u>areas outside Wales</u> (560).
- o 16 - 29 age group from the Southeast Region (532).
- o 30 – 44 age group from <u>other parts of the Mid and West Wales </u>and from areas <u>outside Wales</u> (528 each).

16. The net migration analysis provided by Turley's[48] Briefing in Figure 4 is over a longer timeframe and uses different age cohorts. The graph shows a significant spike in net migration between 2017/18 and 2019/20 in the 18 – 24 cohort and a slight decline in net migration in the 25 – 44 cohort. This suggests that the growth in gross in-migration numbers is related to persons within the 18-24 cohort and the answer may lie in more students being attracted to higher and further educational institutions, but further research is required to better understand these figures.

Population and Household Movements for 2010/11

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[48] Carmarthenshire County Council (November 2022) Appendix 3 Report to Cabinet, November 14 2022.

17. It is interesting to compare the scale of migration outlined above with that recorded in the 2011 Census. **Table A2.2-3** provides analysis from Table (DC8201) of the Census 2011 which records where persons lived one year previously to the Census date by ability to speak Welsh.

18. Overall, the table records that:

- 16,154 persons aged 3 and over moved residence during 2010/11. Of these:

  o 10,545 (65%) moved from addresses within the County itself; and

  o 5,909 (35%) persons aged 3 and over moved to the County from elsewhere during 2010/11.

19. The 5,909 figure above compares to the 6,444 (6,605 less the 165 aged under 3) who are estimated to have moved into Carmarthenshire in 2019/20. It is not possible to make a direct comparison with the people who moved out of the area because the Census table does not record how many people moved out of Wales. However, the figure for those aged 3 and over who moved to other parts of Wales is 2,905. This compares with the 3,667 (3,772- 105) who were recorded as moving to other parts of Wales in 2019/20.

20. Of those who lived at same address, 45% could speak Welsh which compares slightly better than the overall average of 43.9% for the Carmarthenshire.

21. Of those who moved from elsewhere outside the County, 1,499 (25%) were able to speak Welsh. 37% of the 1066 migrants who came from other parts of Wales and 15% of the 427 migrants who came from elsewhere in the UK outside Wales could speak Welsh.

22. This compares to the 4,018 who moved within the County of which 37% could speak Welsh.

Table A2.2-3: Analysis of Address of Residents Aged 3 and Over One Year Ago, by Ability to Speak Welsh

Carmarthenshire	All categories: Age 3 and over Lived at same address one year ago	All categories: Age 3 and over Lived elsewhere one year ago: Total	All categories: Age 3 and over Lived elsewhere one year ago; within same County	All categories: Age 3 and over Inflow: Total	All categories: Age 3 and over *Inflow: Lived elsewhere one year ago outside the area but within 'associated area' (rest of Wales)*	All categories: Age 3 and over *Inflow: Lived elsewhere one year ago outside Wales*	**All categories: Age 3 and over** **Outflow: Moved out of the area to rest of Wales**
Total Persons	160788	16854	10945	5909	*3007*	*2902*	**2905**
Percentage in different Geographic Areas			65%	35%	*51%*	*49%*	
Can speak Welsh	72537	5511	4018	1493	*1066*	*427*	**1153**
Percentage of Category who speak Welsh	45%	33%	37%	25%	*35%*	*15%*	**40%**

Source: ONS 2011 Census Table DC8201WA

Table A2.2-4: Analysis of Households (wholly Moving) by Address One Year Previously by Presence of Dependent Children and Ability to Speak Welsh

Carmarthen shire	All Categories				No Adults can speak Welsh				At Least One Adult Can speak Welsh					
	All	No dep Child	With dep child		All	No dep Child	With dep child		All	%	No dep Child	%	With dep child	%
Whole HH same address	69784	51230	18554		33735	24597	9138		36049	52%	26633	52%	9416	51%
Total Moving HH	6012	3826	2186		3892	2505	1387		2120	35%	1321	35%	799	37%
Within same area	3769	2208	1561		2286	1343	943		1483	39%	865	39%	618	40%
Inflow	1566	1132	434		1163	848	315		403	26%	284	25%	119	27%
Outflow to other parts of Wales	677	486	191		443	314	129		234	35%	172	35%	62	32%
Inflow:														
from other parts of Wales	812	565	247		546	376	170		266	33%	189	33%	77	31%
ex Wales	754	567	187		617	472	145		137	18%	95	17%	42	22%

Source: ONS 2011 Census Table DC8203WA

Households

23. In Carmarthenshire, 69,784 whole households lived at same address one year prior to 2011. Of these:

- 33,735 (48%) were households with no adult being able to speak Welsh.
- 36,049 (52%) were households where at least one adult spoke Welsh. Of these households were:
  - 26,633 with no dependent children where at least one adult spoke Welsh; and
  - 9,416 with dependent children where at least one adult spoke Welsh.

24. In this period, there were 6,012 Totally Moving Households (the figure excludes Partially Moving Households), of which:

- 3,769 moved within same County
- 1,566 moved from outside the County
  - 812 moved from other parts of Wales
  - 754 moved from the rest of UK outside Wales
- 677 moved to other areas of Wales outside the County.

25. Of the 2,120 (35%) Moving Households where at least one adult speaks Welsh:

- 1,483 moved within same County. 799 (40%) with dependent children and with at least one adult who speaks Welsh.
- 403 from outside the County (119 with dependent children). Of these:
  - 266 moved from other parts of Wales (77 (31%) with dependent children and with at least one adult who speaks Welsh);
  - 137 from rest of UK outside Wales (42 (22%) with dependent children and with at least one adult who speaks Welsh).

Implications for the Welsh Language Impact Assessment

26. By applying the existing profile of age Group related Welsh speakers (both within Carmarthenshire and the rest of Wales) and combining it with the Census 2011 ratios discussed above **Table A3.1-1** provides an estimate of the potential linguistic abilities of the migration profile provided for 2019/20.

Table A2.2-5: Crude estimate of Impact of Net Migration on the Number of Welsh Speakers

Age Group	In			Out			Net Totals
	(1) From Rest of Wales (Children @ 25% Adults (@18%)	(2) From Rest of UK (Children @75% Adults@15%)	(3) Possible Gain Welsh speakers (1+2)	(4) To Rest of Wales Children @ 70% Adults @38%	(5) To Rest of UK Children @ 70% Adults @38%	(6) Possible Loss Welsh speakers (4+5)	(7) Possible Net Loss (6-3)
3 – 15	103	178	281	242	142	384	-102
16 – 59	380	302	682	636	1616	2,252	-1,570
60+	106	90	196	134	347	481	-284
Totals	590	570	1,160	1,012	2,105	3,117	-1,957

Source: Authors' own calculations and assumptions

Assumptions

In-migration: From Rest of Wales Children 5 – 15 average level recorded across Wales; adults 16+ Stats Wales average across Wales; From Rest of UK Children 5 - 15 Performance of Immersion Service; adults Census 2011 percentage

Out-migration: To/From Rest of Wales Children 5-15 2021 County recorded rate of children receiving Welsh medium education; adults % able to speak Welsh, Welsh Language, StatsWales

27. The analysis suggests, that based on the migration rates reported in 2019/20 and crude assumptions made about the proportion of migrants who can speak Welsh of those who either moved in or out of Carmarthenshire, there is a possibility that the net number of Welsh speakers, because of migration, decreases annually by 1957 per year. When applied as an average annual figure to the remainder of the Plan Period (13 years) this suggests that the number of Welsh speakers could possibly decrease by 25,441 over the Plan period because of net migration. This, of course, precludes the readiness and ability of adult in-migrants to learn Welsh. For example, on average, 400 learners attend mainstream courses and more than 300 attend supplementary course each year run by Learn Welsh Carmarthenshire, many of whom may have moved to the county in recent times.[49]

Summary and Conclusions

28. The revised Preferred Strategy is based on the 2022 Ten-Year trend-based projection of an increase in population between 2018 and 2033 of 14,468 which in turn leads CCC to conclude that it will require a total dwelling growth of 8,882. This is predicated, in the main, on the assumptions made about current rates of net internal migration as the main driver of population change.

29. The paper sought to try and get a better understanding of whether and how net internal migration assumptions, as the main driver of population, household and dwelling growth would have any implications for the resilience of the Welsh language.

30. Overall, the scale of net migration in 2019/20 appears to have reduced significantly compared to the position two years earlier with out-migration down by 14.5% and in-migration by 8.7%.

31. A significant proportion of net migration is internal to Wales. A total of 57% of in-migrants came from other parts of Wales with 39% of the total coming from

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[49] Estyn (2022) Learn Welsh Inspection Report.

neighbouring counties in the Mid and South West Region.   43% came from other parts of the UK.

32. A total of 4,847 persons moved out of the County with 44% moving within the same Mid and West Region and a further 18% to the Southeast Region. 36.7% moved elsewhere outside Wales with around one third of these being in the 16 – 29 age cohort.

33. The analysis of the 2011 Census of Population returns for those persons who moved from an address outside the County during the previous twelve months suggests that a significant proportion (around a third) of in migrants to Carmarthenshire were from households where at least one adult spoke Welsh. Similarly, around one in six households from outside Wales had at least one adult who speaks Welsh.

34. Whilst past results are, in themselves, no predictor of future outcomes, the evidence presented does suggest that gross in migration is likely to include a significant proportion of households where at least one adult may be able to speak Welsh and thus provide better foundations to plan for enhancing the resilience and vitality of the Welsh language.

*   *   *   *   *   *   *

Appendix 2.3: Implications of Adopting the Ten-Year Trend-Based Growth Scenario for the Welsh Language Baseline Trajectory

1. As stated in **Appendix 2.1**, the Welsh Government's (WG) trajectory for reaching the target of one million Welsh speakers by 2050 has been calculated building upon the 2014 population projection and using four main assumptions based on the policy aims of the strategy:
   - Welsh language transmission at home(reproduction)
   - learning Welsh in school(production)
   - learning Welsh through Welsh for Adults(production)
   - improved continuation of Welsh-speaking ability post-16 (for the objective of increasing the everyday use of the language)

2.3.1 The "Reproduction" Component

2. The Preferred Strategy is based on the 2022 Ten-Year Trend Based projection (10YTBP).
3. Based on a projected population of 202,036 for 2033 and assuming a similar proportion of the population being aged 3 and over (97.24%), this would give a projected population aged 3 and over of 196,460.
4. As discussed in **Appendix 2.3** the trajectory estimate of the Carmarthenshire population aged three and over able to speak Welsh is estimated as 95,608.   *Ceteris paribus*, this would result in the proportion of the total Carmarthenshire population age three and over who are able to speak Welsh as 95,608 /188,339 = 48.6%.
5. The WG 18 Princpal projection forecasts the population 3+ to be 188,417. This would result in the proportion of the total Carmarthenshire population age three and over who are able to speak Welsh as 95,608 /188,339 = 50.8%. effect of this would be a <u>1.2 percentage point</u> reduction in the proportion of Welsh speakers than would be realised under the WG14 based population trajectory scenario (52.0%).

The Impact of Gross Migration figures

6. The Preferred Strategy's assumptions about net inward migration (in terms of what proportion of the population is likely to transmit the Welsh language from one generation to the next ('re-production') alos has key implications for delivering the trajectory baseline of 95,608 Welsh language speakers.
7. As discussed in **Appendix 2.2** the key findings with regards to gross and net migration are:

- Overall, the scale of net migration in 2019/20 appears to have reduced not insignificantly compared to the position two years earlier with out-migration down by 14.5% and in-migration by 8.7%.
- A significant proportion of in-migration is internal to Wales with 39% of the total coming from neighbouring counties in the Mid and Southwest Regions. 43% came from other parts of the UK.
- A significant proportion of out-migration is also internal to Wales with 44% moving from neighbouring counties within the same Mid and West Regions and a further 18% to the Southeast Region.
- Around three out of eight persons moved elsewhere outside Wales with around one third of these being in the 16 – 29 age cohort.
- The analysis of the 2011 Census of Population returns for those persons who moved from an address outside the County during the previous twelve months suggests that around a third of in migrants to Carmarthenshire were from households where at least one adult spoke Welsh.
- Similarly, around one in six in migrant households from outside Wales had at least one adult who speaks Welsh.
- Based on the migration rates reported in 2019/20 and crude assumptions made about the proportion of migrants who can speak Welsh there is a possibility that the net number of Welsh speakers, as a result of migration, decreases annually by 1957 per year.
- When applied as an average annual figure to the remainder of the Plan Period (13 years) this suggests that the number of Welsh speakers could possibly decrease by 25,441 over the Plan period as a result of net migration

2.3.2 The "Production" Component

8. The production of new Welsh speakers derives from sources outside the home. As is demonstrated in Appendix 2.6 the effectiveness of the Council's Welsh in Education Strategic Plans (WESP), both 2017 – 20 and 2022 -32 versions, will be a critical driver of Welsh language ability and use amongst primary and secondary school pupils, particularly aged 3 – 15, and thus of overall Welsh language ability and use.

Discussion

9. All scenarios assume that net internal migration will continue to be the main driver of population change. Although it is not made explicit, it is assumed here that natural change will continue to be negative thus reducing the pool or stock of existing Welsh speakers over time.

10. The 2022 10YTBP implies an increase in residents (outside the BBNPA) by 8,271 over and above the Welsh Government Principal 2018 (WG18) projection of 6,197 residents.[50] The net number of homes required would increase by 3,777.

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[50] Carmarthenshire County Council (November 2022) Report to Cabinet Appendix 3.

Table A3.2-1: Population change by age group under the demographic scenarios (2018 -2033)

Senario	Population Change 2018 - 2033			Population Change % 2018 - 2033		
	0 - 15	16 - 64	65+	0 - 15	16 - 64	65+
10YTBP	-1,090	- 2,298	16,797	-4%	-2%	43%
WG 2018 Principal	-1,727	- 3,189	11,113	-10%	-3%	25%
Net Difference	637	891	5,684	6%	1%	17%

Source: Authors' own calculations (November 2022)

<u>3-15 cohort</u>

11. Based on the 10YTBP Projection, the population aged 0-15 would decrease by -4% whilst the WG2018 Principal Variant Projection(PVP) anticipates a decline of -10%, a net diference of 6%.

12. The net effect of 10YBP Projection over the WG2018 PVP would see a decrease in the 0-15 age group by **637**.

<u>Welsh language implications</u>

13. The main influence on the proportion of the cohort able to speak Welsh is likely to be the effectiveness of the education system rather than the transmission of the Welsh language from one generation to the next at home (although evidence suggests that success is more likely if Welsh is spoken at home).

14. The ambition in Carmarthenshire's Welsh in Education Strategic Plan (WESP) is that 75% of all Year 1 pupils will receive their education through the medium of Welsh by 2033. This is built upon a target of 75% for Nursery-aged pupils (3-4 yrs old) and 78.5% of Reception-aged pupils (4-5 yrs old) receiving their education through the medium of Welsh by 2033. By the end of the Plan period, therefore, the ambition is that there would be 698 more pupils per year receiving their education through the medium of Welsh than the baseline figure for 2021, building upon the increase of 4.5 percentage points (around 85 additional pupils) achieved between 2018 and 2021. By 2033, therefore, because most pupils will have gone through the Carmarthenshire education system, it is likely that the proportion of Welsh speakers aged 3-15 is highly likely to be at least 75%.

15. The projected number of pupils aged 3-15 for Carmarthenshire by 2033 is estimated to be 26,158. Should the target of 75% be achieved, this suggests that there is a realistic possibility that 26,158 (* 75% = 19,618) pupils may be able to speak Welsh by the end of the plan period. This represents a gross increase of 4,104 (19,618 – 15,414) over the figure recorded in the 2011 Census.

16. The assumption made for the baseline trajectory (the WG Trajectory) is that by 2031 55% of pupils aged 15 will be able to speak Welsh. For Carmarthensire this would represent 26,158 (* 55% = 14,387). The difference represents a gross increase of 19,618 – 14,387 = 5,231.

17. This would increase the net number of Welsh speakers over the Trajectory by (95,608 + 5,231) = 100,839.

<u>16 – 64 Age Group</u>

18. The 10YBP projection anticipates a net decrease of the population in the 16-64 age cohort of -2,298 (-2%) for the period 2018 - 2033. (The WG 2018 Projection anticipates a 3,189 reduction (-2.9%)).

19. This would give a net positive increase in the 16 – 64 age group over WG2018 of + 891. Regarding the change in the 16 – 64 age group, the WG2018 projection anticipates a net increase of 1,296 in the 60 – 64 age group.

20. The analysis in **Table A2.2.5** indicates that there is a realistic possibility that of the annual net in-migration figure of 1,058 in the 16 – 59 age group, there would be a net loss of 213 Welsh speakers per year. Over 15 years, this would amount to a net loss of 3,194.

21. **Table A2.2.5** sggests that there would be a slight net gain in the 60+ age group of 29 per year. The 60 – 64 age group is unlikely to take a significant proportion of this figure and so it is assumed that in terms of Welsh speaking ability, the net migration figure will be 0.

22. In summary,
    - The 10YTBP based on the results of the 2011 Census could possibly decrease the number of Welsh speakers aged 16-59 over the WG18 scenario by - 3,194[51]
    - This would change the net number of Welsh speakers recorded in paragraph 17 above by:

    (95,608 + 5,231-3,194) = 97,645

65+ cohort

23. The WG14 Scenario projections anticipate a net increase of the population by 2033 in the 65+ age group of +20,084 (+31%) above the 2014 population.

24. The WG2018 PVP anticipates a net increase of the population in the 65+ age group of 11,113 (+25%) by 2033 above the 2018 population.

25. The 10TBP forecasts an increase for the 65+ cohort of 16,797 by 2033 since 2018. This represents an increase over the WG2018 PV Projection of +5,684.

26. The analysis in **Table A2.2.5** indicates that there is a realistic possibility that of the annual net in-migration figure of 477 in the 60+ age group, there would be a net gain of 29 Welsh speakers per year. As described above, it is unikely that there would be a gain if the 59 – 64 age group is taken away. Over 15 years, this would amount to a net gain of 439.

27. In summary,
    - For the 10YTBP, based on the results of the linguistic ability of migrants as profiled in the 2011 Census, this could possibly incrase the number of Welsh speakers aged 60+ over the WG18 scenario by 439.[52]
    - This would change the net number of Welsh speakers recorded in paragraph 25 above by:

    (95,608 + 5,231-3,194+ 439) = 98,084

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[51] These figures for in migrants from other parts of Wales are possibly towards the lower scale of the spectrum because the percentage of Welsh in migrants from other parts of Wales is likely to be higher if the target of a million speakers by 2050 is rolled out equally across Wales.

[52] As above.

<u>Welsh language implications</u>

28. Anticipating the likely effects of changing population numbers in the 16+ age groups on the Welsh language is more challenging, particularly since large assumptions are being based on the outomes of one year in the past being repeated over twenty years later.

29. Based on assumptions about the characteristics of in-migrants from the 2011 Census, the net change in population scenario figures for the 2022 10YTB projection over WG18 and the future success rate of Carmarthenshire's Welsh Language Education Strategy, the numbers of Welsh speakers could possibly be higher than the WG Trajectory by:

Total number of Welsh speakers = 95,608 + 5,231-3,194 + 439 = 98,084

Percentage of Welsh speakers aged 3+ = 98,084 divided by 196,460 = 49.9%.

30. This suggests a realistic possibility of a decrease of 0.9% percentage points over the WG18 Trajectory scenario (50.8%). It is important to note that 55% of the increase is achieved thorugh the WESP intervention rather than as a result of the Preferred Growth Option, although it is also reasonable to note that policy interventions designed to retain or increase the number of young people are likely to feed into a higher number of school pupils able to speak Welsh and thus boost the overall proportion.

31. It is also important to note that in recent years a high percentage of in-migrants is the result of re-locations from neighbouring counties and from elsewhere in Wales. The percentage of households where at least one adult and a high proportion of dependent children are likely to be able to speak Welsh, will probably increase over time.

*   *   *   *   *   *   *

Appendix 2.4: The Evidence Base for a Welsh Language Impact Assessment of the Preferred Spatial Strategy

1. This Appendix aims to try and develop a more robust evidence base that can be used as the basis for undertaking a Welsh Language Impact Assessment of the Preferred Spatial Strategy. It begins by establishing the position for each Cluster at the 2011 Census – the most recent collection of comprehensive data on the use and understanding of the Welsh and English languages. At the time of writing this report, the more recent 2021 Census results pertaining to the Welsh language are expected to be released in early 2023.

Table A2.4-1: Cluster Baseline Position[53]

Cluster		All Usual Residents Aged 3 and Over	Can Speak Welsh	Can Speak Welsh
Cluster		**Count**	**Count**	**Percentage**
Cluster 1	Carmarthen and its Rural Areas	32447	15191	46.8%
Cluster 2	Llanelli a Gwendraeth Isaf	70729	22736	32.1%
Cluster 3	Aman a Gwendraeth Uchaf	41010	24069	58.7%
Cluster 4	Dyffryn Teifi	12475	6745	54.1%
Cluster 5	Tywi Uchaf	10071	4742	47.1%
Cluster 6	Western Sir Gâr	9910	4008	40.4%
Totals		176642	77491	43.9%

Source: Author's own analysis of Census 2011 data

2. As can be seen in **Table A2.4-1** the highest number of Welsh speakers is found within the Aman and Upper Gwendraeth Valleys with 24,069. This is followed closely by the Llanelli and Lower Gwendraeth Cluster with 22,736.

3. The Cluster with the largest percentage that can speak Welsh is also Aman and Upper Gwendraeth Valleys with 58.7%. This is followed by Cluster 4 (Dyffryn Teifi) with 54.1%. Cluster 1 (Carmarthen and its Rural Areas) and Cluster 5 (Tywi Uchaf) both score 46.8% and 47.1% respectively.

4. Although it has the largest number of Welsh speakers, Cluster 2 (Llanelli and the Lower Gwendraeth) has the lowest figure in percentage terms.

5. Our preferred methodology for establishing Welsh Language Resilience (WLR) is based on normalising the data on number of Welsh speakers and adding the normalised

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[53] An attempt has been made to adjust the total cluster populations to reflect that a small percentage reside within the Brecon Beacons National Park. For the purposes of this exercise, it has been assumed that the population (around a 1,000) reside within the Tywi Uchaf Cluster (Cluster 5).

score to the threshold weighting. **Table A2.4-2** shows the results of WLR for each cluster.

Table A2.4-2: Welsh Language resilience score according to cluster

	Cluster	All Usual Residents Aged 3 and Over	Can Speak Welsh	Normalised Count		Can Speak Welsh		WLR = NWS +PWS threshold weighted	
	Cluster	Count	Count			Percentage		Weighting	Score
Cluster 1	Carmarthen and its Rural Areas	32447	15191	0.76		46.8%		1	1.76
Cluster 2	Llanelli and Lower Gwendraeth	70729	22736	1.13		32.1%		1	2.13
Cluster 3	Amman and Upper Gwendraeth	41010	24069	1.20		58.7%		2	3.20
Cluster 4	Teifi Valley	12475	6745	0.34		54.1%		2	2.34
Cluster 5	Upper Tywi	10071	4742	0.24		47.1%		1	1.24
Cluster 6	Western Carmarthenshire	9910	4008	0.20		40.4%		1	1.20
	Totals	176642	77491.44132			43.9%			
	MIN		4008			0.32			
	MAX		24069			0.59			

Source: Author's own analysis of Census 2011 data

6.   **Table A2.4-2** confirms that the Aman and Gwendraeth valleys had the most resilient Welsh language cluster in 2011 relative to the rest of Carmarthenshire due to the large count of Welsh speakers. In terms of the rest of Wales, the percentage is below the 70% threshold which is the minimum threshold commonly used to define a resilient Welsh speaking area.

7.   **Figure A2.4-1** maps out the WLR by cluster and provides an assessment based on their relative position to each other. It confirms that the most resilient cluster is Cluster 3 (Amman and Upper Gwendraeth) with the weakest resilience scored for Clusters 5 and 6 (Upper Tywi and West Carmarthenshire).
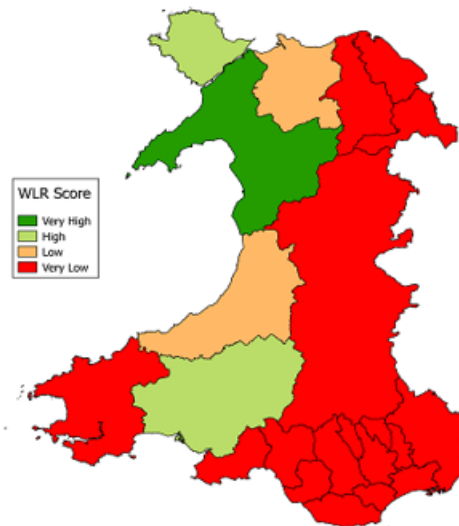
Figure A2.4-1: Carmarthenshire Welsh Language Resilience according to cluster
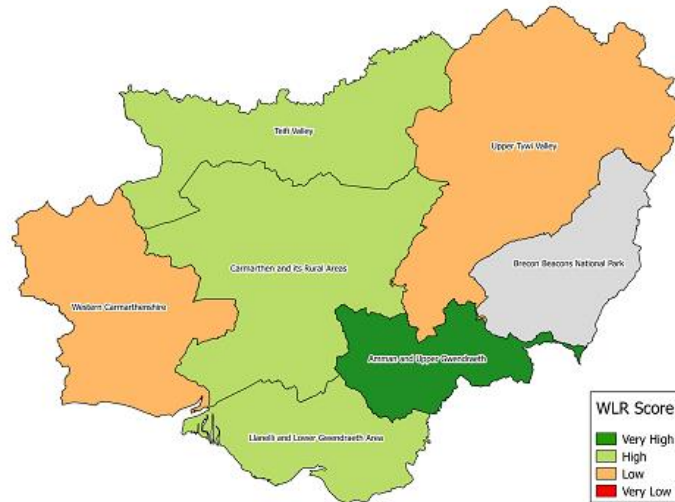
Source: Carmarthenshire County Council Forward Planning Section (December 2019) – adaption of 2011 Census figures for Welsh speakers by ward

8. It is not possible to produce a map showing the cluster's relative scores to the rest of Wales as counts cannot be normalised against Maximum and Minimum similar clusters.

9. **Figure A2.4-2** does, however, map out the WLR by ward level based on these ward's relative resilience compared to wards <u>in the rest of Wales</u>. It confirms that the most resilient ward (Llannon) is located within Cluster 3 with the weakest (Glanymôr) in Cluster 2. Higher areas of resilience are generally found in Clusters 3 and 4 whilst in general lower areas of resilience are identified in Clusters 1 (Carmarthen and to the southern end of the cluster), 5 and 6.

Figure A2.4-2: Welsh Language Resilience in Carmarthenshire wards
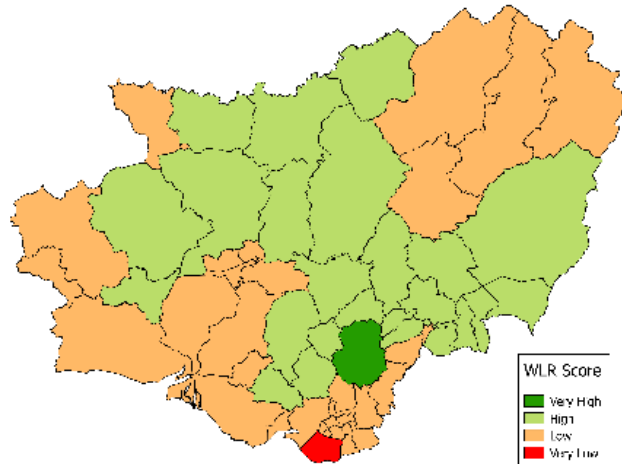
Source: Carmarthenshire County Council Forward Planning Section (December 2019) – adaption of 2011 Census figures for Welsh speakers by ward

10. **Figure A2.4-3** shows the relative position of Welsh Language Resilience in Carmarthenshire to other Local Authorities in Wales.

Figure A2.4-3: Carmarthenshire Welsh Language Resilience in relation to local authorities in Wales

Source: Carmarthenshire County Council Forward Planning Section (December 2019) – adaptation of Professor David Demerit's analysis of 2011 Census figures for Welsh speakers by Local Authority.

11. **Table A2.4-3** analyses the number and percentage of Welsh speakers for each cluster by age group. The maximum and minimum score for both numbers and percentages are highlighted in green and red respectively.

Table A2.4-3: Number and percentage of Welsh speakers by age group in each cluster

		All usual residents aged 3-15			All usual residents aged 16-64			All usual residents aged 65 and over		
		Total	Can speak Welsh		Total	Can speak Welsh		Total	Can speak Welsh	
	Cluster	Count	Count	%age	Count	Count	%age	Count	Count	%age
Cluster 1	Carmarthen and its Rural Areas	4588	2758	60.1%	20559	8853	43.1%	7169	3639	50.8%
Cluster 2	Llanelli a Gwendraeth Isaf	11147	4778	42.9%	45153	11973	26.5%	14249	5985	42.0%
Cluster 3	Aman a Gwendraeth Uchaf	6322	4600	72.8%	25986	14000	53.9%	8702	5223	60.0%
Cluster 4	Dyffryn Teifi	1820	1407	77.3%	7753	3872	49.9%	2902	1633	56.3%
Cluster 5	Tywi Uchaf	1449	1006	69.4%	6704	2920	43.6%	2918	1251	42.9%
Cluster 6	Western Sir Gâr	1407	843	59.9%	6301	1994	31.6%	2202	820	37.2%
Totals		26,733	15,392	57.6%	112,456	43,612	38.8%	38,142	18,551	48.6%

Source: authors' own analysis of Census 2011 data

Residents aged 3 – 15

12. The highest number of residents able to speak Welsh is found in the Llanelli and Gwendraeth Isaf Cluster (Cluster 2) (4,778) with the lowest number in Western Sir Gâr (Cluster 6) (843). In percentage terms, the highest percentage is found in Dyffryn Teifi Cluster 4 (77.3%) with the lowest percentage in Cluster 2 (42.9%).

13. It suggests that in 2011 two of the clusters (Cluster 3 and 4) succeed in turning out over 70% of pupils as bilingual with Cluster 5 narrowly missing the 70%. A further two clusters produce around 60% with Cluster 2 being the only cluster where the percentage is below 50%.

14. The annual collection of PLASC (Pupil Level Annual School Census) recorded each January) data does allow us to monitor and update the position in relation to pupils aged 5 – 15 and their ability in Welsh, as reported by their parents. While this data needs to be treated with caution regarding its reliability, it does provide an indication of parents' perceived levels of their children's fluency in Welsh. **Table A2.4-4** summarises the position for Carmarthenshire pupils as a whole in January 2019 which corresponds closest to the Second Deposit LDP baseline.

Table A2.4-4: Pupils aged 5 – 15 with ability[54] in Welsh

Carmarthenshire PLASC data 2018/2019									
Age groups	Fluent in Welsh		Not fluent in Welsh		Cannot speak Welsh		Total	Ability (Fluent + Not Fluent)	
	Count	Percentage	Count	Percentage	Count	Percentage	Count	Count	Percentage
5 to 10	4,855	39.8%	3,330	27.3%	4,020	32.9%	12,205	8,185	67.1%
11 to 15	4,075	42.2%	3,190	33.1%	2,380	24.7%	9,645	7,265	75.3%
Totals	8,930	40.9%	6,520	29.8%	6,400	29.3%	21,850	15,450	70.7%

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[54] 'Ability to Speak Welsh' & 'Speaking Welsh at Home', as assessed by parents.

Source: Welsh Government PLASC Data January 2019[55]

15. Whilst it is difficult to compare usual residents aged 3 to 15 at the Census 2011 (all usual residents 26,733) with school rolls (pupils aged 5-15) , **Table A2.4-4** does suggest that, against a declining school age population, the ability to speak Welsh has significantly increased from 57.6% to 70.7%.

16. This trend is reinforced by the PLASC returns for 2021/22 as shown in Table **A2 6-5**.

Table A2.4-5: Pupils aged 5 – 15 with ability[56] in Welsh

Age groups	Fluent in Welsh		Not fluent in Welsh		Cannot speak Welsh		Total	Ability (Fluent + Not Fluent)	
Carmarthenshire PLASC data 2021/2022									
	Count	Percentage	Count	Percentage	Count	Percentage	Count	Count	Percentage
5 to 10	4,175	34.7%	6,485	53.9%	1,370	11.4%	12,030	10,660	88.6%
11 to 15	4,265	42.3%	3,845	38.2%	1,965	19.5%	10,075	8,110	80.5%
Totals	**8,440**	**38.2%**	**10,330**	**46.7%**	**3,335**	**15.1%**	**22,105**	**18,770**	**84.9%**

Source: Welsh Government PLASC Data March 2022

17. Again, this shows that the ability of pupils to speak Welsh (as assessed by parents) continues to grow rapidly with **Table A2.4-5** suggesting that the number and percentage of pupils with the ability to speak Welsh at primary school age, in particular, has grown from 8,185 (and 67.1%) to 10,660 (and 88.6%). Similarly, the count of the numbers and percentages who were assessed as "cannot speak Welsh" has declined from 4,020 (32.9%) to 1,370 (11.4%).

18. However, the overall numbers of pupils aged 5 -15 who speak Welsh fluently is a cause for concern as this group has declined by 490 from 8,930 (40.0%) in 2019 to 8,440 (38.2%) in 2022. Research indicates that children and young people who speak Welsh fluently and speak Welsh at home are likely to be those who use the language outside the classroom and may therefore reflect a decline in the resilience of the language in community use.

19. Within each age group, the ability and fluency of the cohort increases with age. This augurs well in terms of both a growth and spatial strategy that has as one of its main aims an ambition to retain more young people and grow the Welsh language.

Figure A 2.4-4: Change in percentage of Carmarthenshire pupils aged 5-11 and 11-15 according to Welsh language ability between 2019 and 2022

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[55] 'Ability to Speak Welsh' & 'Speaking Welsh at Home', as assessed by parents, of pupils aged 5 and over in primary schools by local authority (gov.wales) and 'Ability to Speak Welsh' & 'Speaking Welsh at Home', as assessed by parents, of pupils aged 11-15 in secondary schools by local authority (gov.wales). The Ability score includes pupils 'fluent in Welsh' and 'not fluent in Welsh'. The data includes all pupils categorised by parents as "Not Applicable"

[56] 'Ability to Speak Welsh' & 'Speaking Welsh at Home', as assessed by parents.
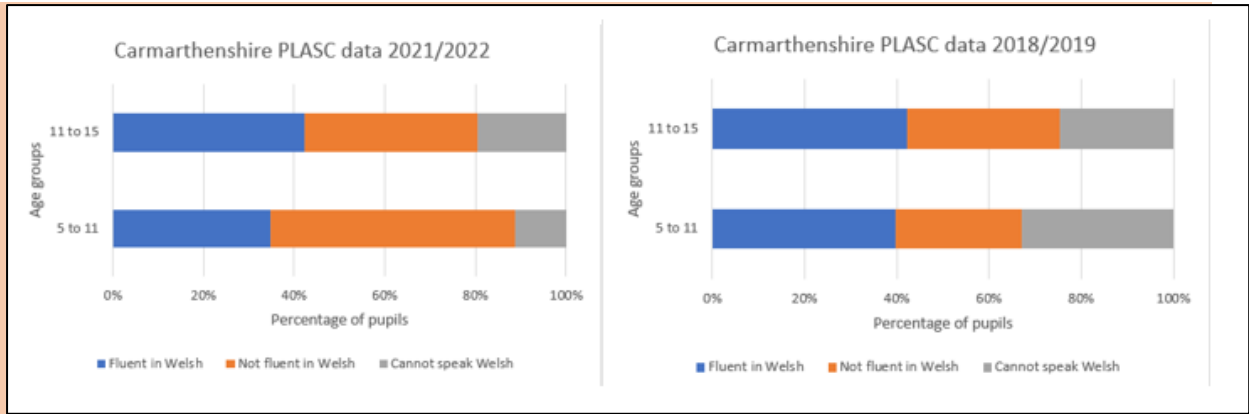
Source: Welsh Government PLASC data, January 2019 and 2022

20. **Figures A2.4-5**, **A2.4-6, A2.4-7, A2.4-8** present the percentage of the school populations in each cluster according to Welsh language ability according to the Pupil Level Annual School Census data collected in January 2019 and January 2022.

21. These figures reflect a clear pattern that is also found in Tables **A2.4-4** and **A2.4-5**, as well as **Figure A 2.4-4**. That is, the 'Not Fluent in Welsh' category has grown at the expense of the 'Cannot speak Welsh' category as well as the 'Fluent in Welsh category'. This is more pronounced in some areas, with the starkest example being 'Carmarthen and its Rural Areas' amongst the 5-11 age group.

Figure A2.4-5: Percentage of pupils aged 5-11 in Carmarthenshire primary schools according to cluster and according to Welsh language ability, January 2019
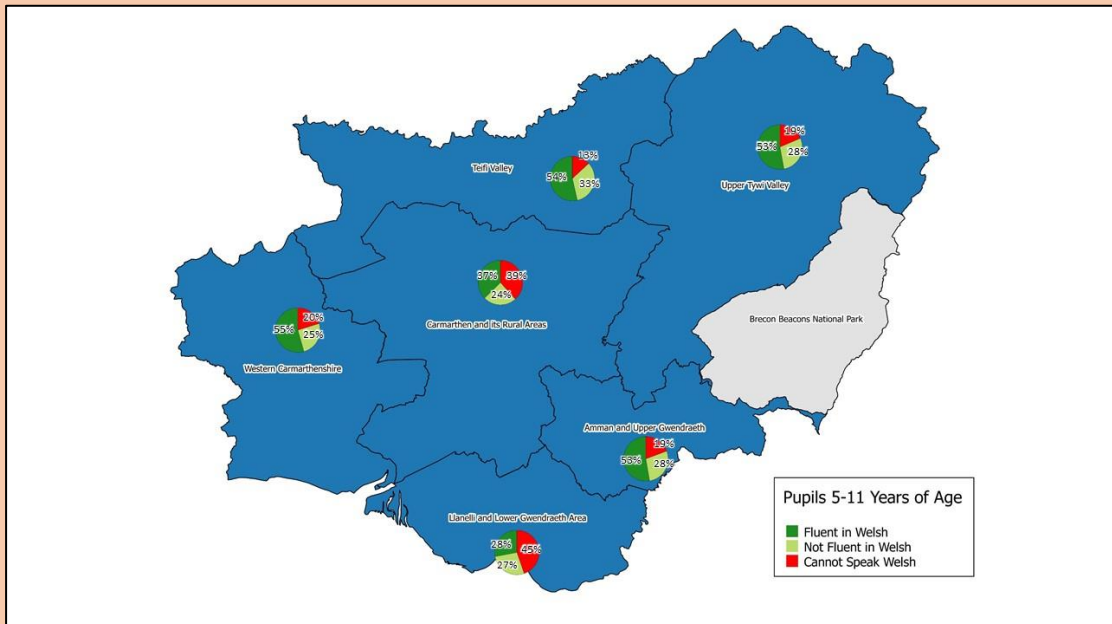
Source: PLASC, January 2019

Figure A2.4-6: Percentage of pupils aged 5-11 in Carmarthenshire primary schools according to cluster and according to Welsh language ability, January 2022
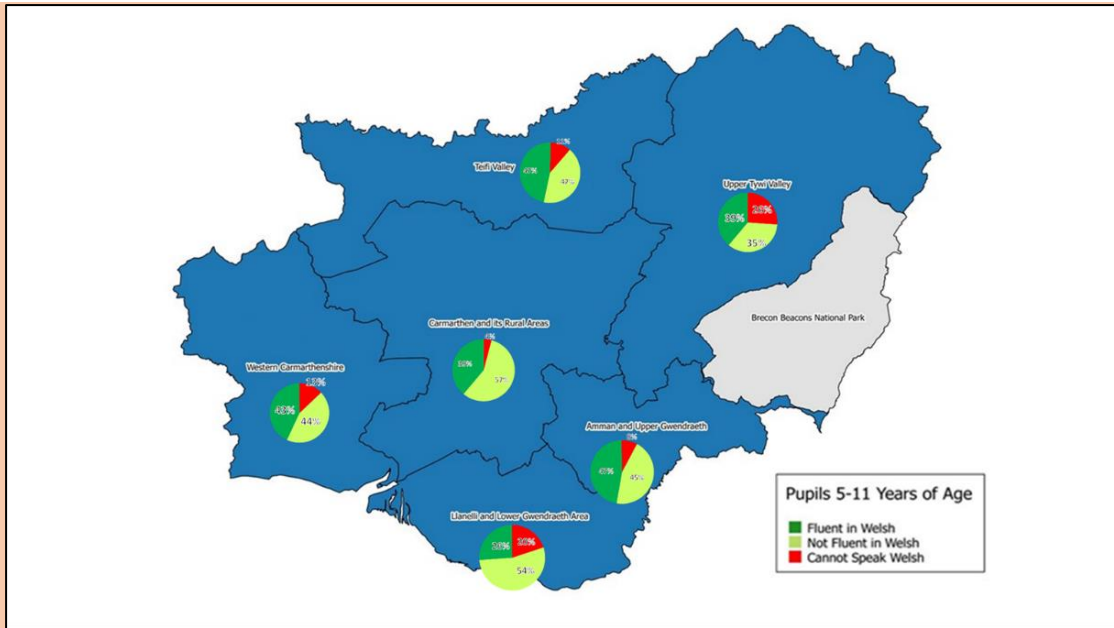
Source: PLASC, January 2022

Figure A2.4-7: Percentage of pupils aged 11-16 in Carmarthenshire secondary schools according to cluster and according to Welsh language ability, January 2019
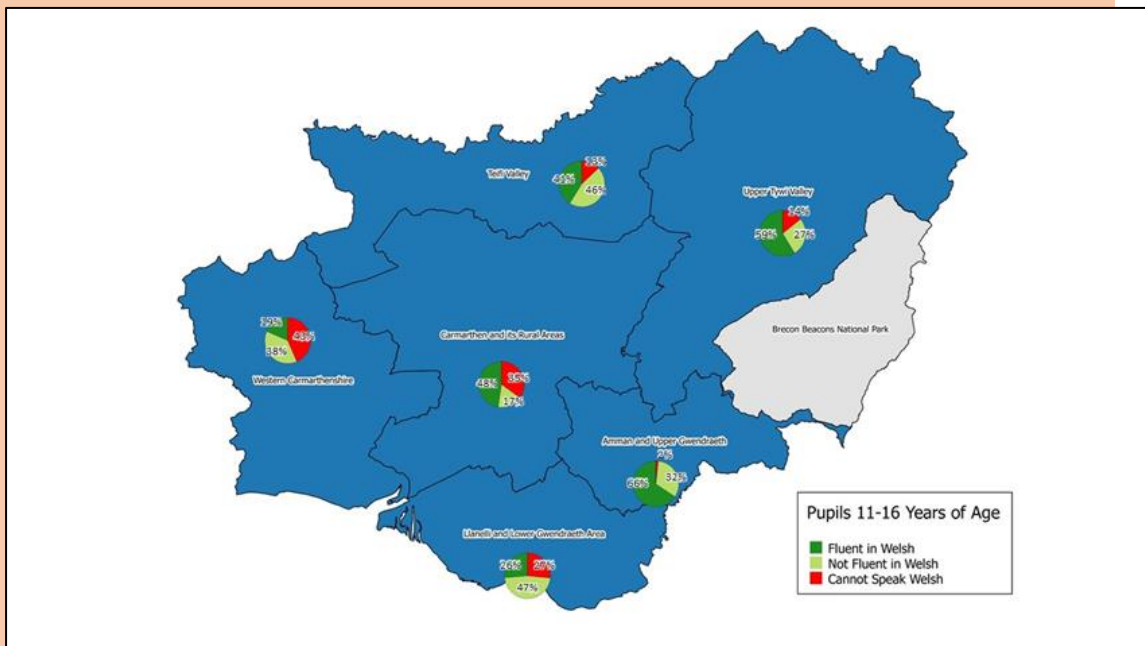
Source: PLASC, January 2019

Figure A2.4-8: Percentage of pupils aged 11-16 in Carmarthenshire secondary schools according to cluster and according to Welsh language ability, January 2022
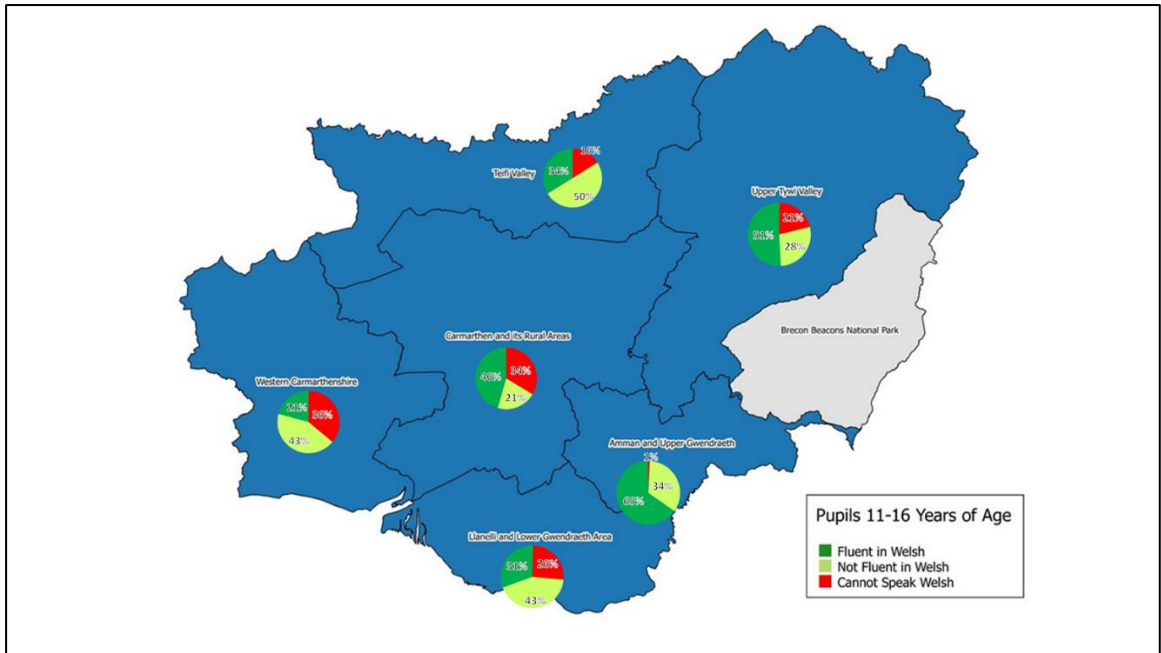
Source: PLASC, January 2022

Residents aged 16 to 64

22.   The highest number of residents recorded in the Census 2011 as being able to speak Welsh is found in Cluster 3 (Aman and Gwendraeth Uchaf) (14000) with the lowest number again in Western Carmarthenshire (Cluster 6) (1,994). In percentage terms, the highest percentage is found in Cluster 3 (53.9%) with the lowest percentage in Cluster 2 (26.5%).

Residents aged 65+

23.   The highest number of residents able to speak Welsh is found in Cluster 2 (Llanelli and Gwendraeth Isaf) (5,985) with the lowest number in Western Sir Gâr (Cluster 6) (820). In percentage terms, the highest percentage is found in Cluster 3 (60.0%) with the lowest percentage in Cluster 6 (37.2%).

2033 Trajectory

24.   The Growth Strategy is based on apportioning the preferred level of growth by cluster area. **Table A2.4-6** shows the results of apportioning growth to each cluster and using the Population increase assumed as the basis of Growth to apportion the population growth to each cluster. An assumption is then made about the population aged 3 and over (based on the proportion at Census 2011 of 97.2%) to arrive at the population trajectory figure for each cluster.

Table A2.4-6: Population growth trajectory by cluster area

Cluster		Estimated no. of units in the cluster(HOM1 Land Allocations)	Percentage	10yTB Pop Increase	Disaggregation of 10YTB 14468 Pop Increase	Population aged 3 and over @97.2%
Cluster 1	Carmarthen and its Rural Areas	1690	24.8%		3,583	3483
Cluster 2	Llanelli a Gwendraeth Isaf	2840	41.6%		6,021	5853
Cluster 3	Aman a Gwendraeth Uchaf	1267	18.6%		2,686	2611
Cluster 4	Dyffryn Teifi	218	3.2%		462	449
Cluster 5	Tywi Uchaf	162	2.4%		343	334
Cluster 6	Western Sir Gâr	647	9.5%		1,372	1333
Total		**6824**	**100.0%**	**14468**	**14,468**	**14,063**

Source: Author's analysis and estimate of disaggregation of PG 10 (2019 Addendum) projected growth of population by cluster.

Population Change 2011 – 2018

25. Analysis of the Edge Analytics mid-year estimates data of Population Growth between 2011 and 2018 suggests that the population has grown by 4,685. **Table A2.4 -7** shows estimated of the increase in each age group by apportioning the age cohort group analysis into the three age groups (aged 3 years and over.)

Table A2.4-7: Estimated increase in population by age group between 2011 – 2018

Age Group	Estimated Change 2011 – 2018
0 to 2	406
3 – 15	1,292
16 – 64	2,319
65+	668
Total	4,685

Source: Authors' own analysis based on Edge Analytics (2019) Addendum Report

Population Change 2018 – 2033

Option 1 (Business-as-usual)

26. The background evidence to the current LDP contains projected population estimates up to 2026 based on the Preferred Growth strategy at the time and estimates the consequence of the Preferred Growth Strategy to be a population of 197,100 by 2026. This compares to an estimated population of 195,012 under the PG (2019 Addendum Scenario).

27. **Table A2.4-8** calculates the projected population for the Plan Area by 2033 based on extending the equivalent rate over the 2021-26 period to 2026-31.

Table A2.4-8: projected population growth in Carmarthenshire LDP area by 2033

Census	Mid Year Estimates							LDP 1 Projections		
2011	2012	2013	2014	2015	2016	2017	2018	2021	2026	2033
183,961	184,332	184,669	184,968	185,247	185,754	186,452	187,568	192,740	197,100	199,631

28. This gives us a projected population of 199,631 by 2033 and by assuming that the proportion of the population aged 3 and over is, at present, 97.24% of the total population, this gives us a figure for the number of residents aged 3 and over of 195,638.

29. **Table A2.4-9** calculates the number and percentage of Welsh speakers by cluster and the total for the Plan Area.

Table A2.4-9: Projected number and percentage of Welsh speakers aged 3 and over by 2033 (Business-as-usual)

Cluster		Residents Age 3+	Welsh Speakers	
		LDP 1 (Option 1) Projection		
Cluster 1	Carmarthen and its Rural Areas	35936	18742	52.2%
Cluster 2	Llanelli a Gwendraeth Isaf	78335	28051	35.8%
Cluster 3	Aman a Gwendraeth Uchaf	45420	29696	65.4%
Cluster 4	Dyffryn Teifi	13817	8322	60.2%
Cluster 5	Tywi Uchaf	11154	5851	52.5%
Cluster 6	West Carmarthenshire	10976	4945	45.1%
Total		**195638**	**95608**	**48.9%**

Source: Author's own calculations

Preferred Spatial Strategy

30. **Table A2.4-10** reproduces the Edge Analytics table showing the projected population change from 2018 to 2033. Adding both sets of figures gives us a trajectory for population change to 2033 over the 2011 baseline figure.

Table A2.4-10: Projected population change Carmarthenshire 2018 - 2033

Age Group	2018	Percentage	2033	Percentage
3 – 15	28,171	15%	28453	14%
16 – 64	114,906	62%	112608	57%
65+	38,844	21%	55,641	28%
Totals	186,568	100%	196,702	100%

Source: Authors' own calculations

31. As is indicated in all population projection scenarios, the main growth in population will occur in the population aged 65 and over with a slight increase in the population aged 3 – 15 and a slight decrease in the population aged 16 to 64.

32. In order to calculate the projected population by 2033 according to cluster, we have apportioned this assumed growth in proportion to the trajectory of housing allocations proposed for each cluster (we have assumed an average household size of 2.26 residents across all clusters). We have also assumed that the number of Welsh speakers is according to our analysis of the impact of the Preferred Growth strategy on the number of Welsh speakers and allocated this proportionately to each cluster (**Table A2.4-11**).

Table A2.4-11: Projected number and percentage of Welsh speakers aged three and over by 2033 according to cluster

	Cluster	Preferred growth strategy Residents Age 3+	Preferred Spatial Strategy rLDP1 (PG 10 2019) Welsh Speakers		Preferred Spatial Strategy(rLDP2) (10YTB) Welsh Speakers		Difference No.	Difference % points
Cluster 1	Carmarthen and its Rural Areas	36087	19382	53.7%	19046	52.8%	-336	-0.93
Cluster 2	Llanelli a Gwendraeth Isaf	78664	30890	39.3%	30355	38.6%	-535	-0.68
Cluster 3	Aman a Gwendraeth Uchaf	45611	29826	65.4%	29309	64.3%	-517	-1.13
Cluster 4	Dyffryn Teifi	13875	8442	60.8%	8295	59.8%	-146	-1.05
Cluster 5	Tywi Uchaf	11201	6046	54.0%	5941	53.0%	-105	-0.94
Cluster 6	West Carmarthenshire	11022	5228	47.4%	5138	46.6%	-91	-0.82
Total		196460	99814	50.8%	98084	49.9%	-1730	-0.88

Source: Authors' own calculations

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Appendix 3.1: Carmarthenshire Second Deposit rLDP – Welsh Language Policies

Strategic Policy – SP 8: Welsh Language and Culture

The Plan supports development proposals which safeguard, promote and enhance the interests of the Welsh language and culture in the County. Development proposals which have a detrimental impact on the vitality and viability of the Welsh language and culture will not be permitted unless the impact can be mitigated. All development proposals subject to WL1, will be expected to identify measures which enhance the interests of the Welsh language and culture.

11.172 The Welsh language and culture play an important role in the social, cultural and economic life of Carmarthenshire's residents and visitors. The proportion of Welsh speakers in Carmarthenshire is significantly higher than the Welsh national average and as such is a significant part of the social fabric of the County's communities, providing a strong sense of place and identity.

11.173 Carmarthenshire in its entirety is considered to be an area of linguistic sensitivity. The 2011 Census indicates that 19.0% of the Welsh population are able to speak Welsh, whilst the correlating figure for Carmarthenshire stands at 43.9%. In terms of the geographical breakdown of the proportion of speakers across the County, this is lowest in the Glanymor electoral ward where 19.2% speak Welsh, and highest in Quarter Bach where 68.7% speak Welsh. The proportion of Welsh speakers is higher than the national average across each ward in the County, and it is largely for this reason Carmarthenshire in its entirety is considered to be linguistically sensitive. Additionally, the most recent Census data has shown a substantial decrease in the number of Welsh speakers across the County illustrating the language's vulnerability in Carmarthenshire.

11.174 The Plan seeks to 'promote the Welsh language and culture'[59] and is committed to contributing to the Welsh Government's long-term aim of achieving 1 million Welsh speakers by 2050[60]. To deliver on this aim, the Council will support, promote, and enhance the Welsh language as a viable community language by ensuring that there are sufficient and proportionate employment and housing opportunities to sustain both the rural and urban communities in the County and by implementing an effective monitoring framework. In doing so, the Plan seeks to ensure that the local population have the opportunity to remain in Carmarthenshire rather than leave in search of work opportunities and housing, as well as the opportunity to return. Through aiming for sustainable growth, the Plan will also maximise opportunities for non-Welsh speakers who move to the County to be integrated into community life at a scale and pace that will not undermine the vitality and viability of the Welsh language and culture.

11.175 The need to safeguard, promote and enhance the Welsh language applies to developments proposed across the County and is not restricted to specific areas within the County. Development proposals will be required to acknowledge the official status of the Welsh language and commit to treating the Welsh language no less favourably than the English language.

11.176 Specific policies provide further guidance to ensure that development of an appropriate scale, type and character is delivered to meet the needs of the communities. Furthermore, the Revised LDP will seek to ensure that development occurs at a rate which can be absorbed and assimilated without damaging the character of the community.

11.177 The Plan also seeks to safeguard, promote, and enhance the Welsh language in Carmarthenshire through other relevant policy objectives, namely through the provision of housing and affordable housing, promoting a vibrant economy and employment opportunities and the provision and retention of community facilities, amongst others.

WL1: Welsh Language and New Developments

All development proposals throughout Carmarthenshire will be required to safeguard, promote and enhance the Welsh language.

The following development proposals will be required to submit a Language Action Plan, setting out the measures to be taken to safeguard, promote and enhance the Welsh language:

a) Residential developments of 5 or more dwellings which will individually or cumulatively provide more than the indicative housing provision set out for the settlement in Policies HOM1 and HOM3; or

b) Residential development of 5 or more dwellings on allocated or windfall sites that do not address evidence of need and demand for housing recorded in a Housing Market Assessment or other relevant local sources of evidence; or ,

c) Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more or a site area measuring more than 1 hectare.

Proposals on unexpected windfall sites for large scale housing development or large scale employment development that would lead to a significant workforce flow are required to submit a Welsh Language Impact Assessment which will set out how the proposed development will protect, promote and enhance the Welsh language.

Proposals which do not accord with the Plan's housing trajectory (Appendix 7) will be required to provide a phasing plan outlining the timescales for delivering the homes proposed on the site and demonstrate that they would not have a negative impact upon the Welsh language which cannot be mitigated.

11.178 The Welsh Language Action Plan sets out the measures to be taken to safeguard, promote and enhance the Welsh language. The Welsh Language Action Plan should also outline how the development proposes to make a positive contribution towards the community's Welsh language groups. This could, amongst others, include providing support and funding towards organisations and bodies that provide activities, facilities and education for Welsh speakers and learners, and support and funding towards Welsh language classes. Welsh Language Impact Assessments (WLIA) will be required to outline the anticipated impacts of the proposed development upon the Welsh language in the County. The Welsh Language Supplementary Planning Guidance61 provides further guidance on when a WLIA is required, clarifying what constitutes a large scale development, as well as how to produce a WLIA.

11.179 Whilst support for projects can be provided through financial contributions, they may also be provided through other means. Planning permission will be subject to conditions or

legal agreements to secure the implementation of the mitigation and enhancement measures proposed within the Action Plan. Further guidance on the content of Welsh Language Action Plans will be provided through Supplementary Planning Guidance.

11.180 The LDP's housing trajectory is outlined in Appendix 7 of the Plan. The impacts of the scale, location and rate of development have been assessed in accordance with the agreed trajectory. Proposals for developments which do not accord with the timescales of the trajectory are consequently not fully assessed. Such proposals will therefore be required to be supported by a phasing plan outlining the number of dwellings to be delivered within each financial year. In such cases, planning permission may be subject to a condition to secure the agreed phasing of delivery, where considered necessary.

11.181 The Plan's Strategy provides for organic growth on a small scale within the Rural Villages and policies HOM1 and HOM3 build upon this allowing development of appropriate scale and in appropriate locations. It is considered that incremental development on this scale can make a positive contribution towards the sustainable growth of the Welsh language in rural communities, and any negative impacts are likely to be absorbed by the community. Unforeseen development of significant scale which is not allowed for in the Plan's policies may not be compatible with the Plan's Strategy, and their impacts are therefore unassessed and unknown. In the event that such proposals are presented for consideration, they will need to be accompanied by a full assessment of their likely effects upon the Welsh language.

11.182 The ISA of the LDP is required to assess the likely effects of the LDP upon the Welsh language. This is done iteratively at key stages throughout the Plan's production. The likely anticipated effects are presented in the ISA report, and further information is available within the LDP's evidence base.

11.183 The LDP provides further guidance on the provision of bilingual advertisements in Policy PSD9 – Advertisements. In order to promote the cultural identity and to safeguard the local linguistic character of Carmarthenshire, the Council will encourage bilingual marketing of new housing and commercial developments as well as encourage Welsh street and development names. Additional guidance on providing Welsh street names is provided in Carmarthenshire's Street Naming and Numbering Policy.

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Appendix I

Equality Impact Assessment

Appendix I: Equality Impact Assessment

This document is the Equality Impact Assessment (EqIA) of the Deposit rLDP (the 'Plan'). It is based upon a template created by the Equalities Team within Carmarthen County Council. Whilst a standalone assessment, it should be read in consideration of the sociological impacts outlined within the Integrated Impact Assessment (ISA), and alongside the plans, policies, and vision contained within the Plan for further context. In addition to the 9 protected characteristics outlined within The *Equality Act 2010[1]*, the Council recognises the potential disparity of impact the rLDP may have on the Welsh language, and, therefore, this characteristic has been screened in to this process. The EqIA will be appropriately reviewed considering any changes made to the Plan in response to the consultation process and upon adoption, and associated legislation and guidance will be monitored to ensure the fulfilment of our legislative requirement. A EqIA of the preferred strategy (conducted in December 2018) initially identified that potentially high negative impacts may disproportionately affect age, disability, race, and the Welsh language. In addition to other sociological impacts and considerations, particular regard of these characteristics was given throughout the Plan making-process and were monitored (alongside all protected characteristics) during the iterative process between the ISA and the Plan.

Contents

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[1] https://www.legislation.gov.uk/ukpga/2010/15

1. Introduction

1.1   The **Equality Act 2010**

The Equality Act 2010 (the Act) brings together and replaces the previous anti-discrimination laws with a single Act. It simplifies and strengthens the law, removes inconsistencies, and makes it easier for people to understand and comply with it. Much of the Act came into force on 1 October 2010.

The Act includes a new public sector equality duty (the 'general duty'), replacing the separate duties on race, disability, and gender equality. This came into force on 5 April 2011.

1.2   **What is the general duty?**

The aim of the general duty is to ensure that public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and the delivery of services and that they are kept under review. This will achieve better outcomes for all.

The duties are legal obligations. Failure to meet the duties may result in authorities being exposed to legal challenge.

Under equality legislation, public authorities have legal duties to pay 'due regard' to the need to eliminate discrimination and promote equality with regard to race, disability and gender, including gender reassignment, as well as to promote good race relations. The Equality Act 2010 introduces a new public sector duty which extends this coverage to age, sexual orientation, pregnancy and maternity, and religion or belief. The law requires that this duty to pay 'due regard' be demonstrated in the decision-making process. It is also important to note that public authorities subject to the equality duties are also likely to be subject to the obligations under the Human Rights Act and it is therefore wise also to consider the potential impact that decisions could have on human rights as part of the same process.

1.3   Carmarthenshire County Council's approach to Equality Impact

To ensure that the council is considering the potential equality impact of its proposed policies and practices, and in order to evidence that we have done so, every proposal will be required to be supported by the attached Equality Impact Assessment. Where this assessment identifies a significant impact then more detail may be required.
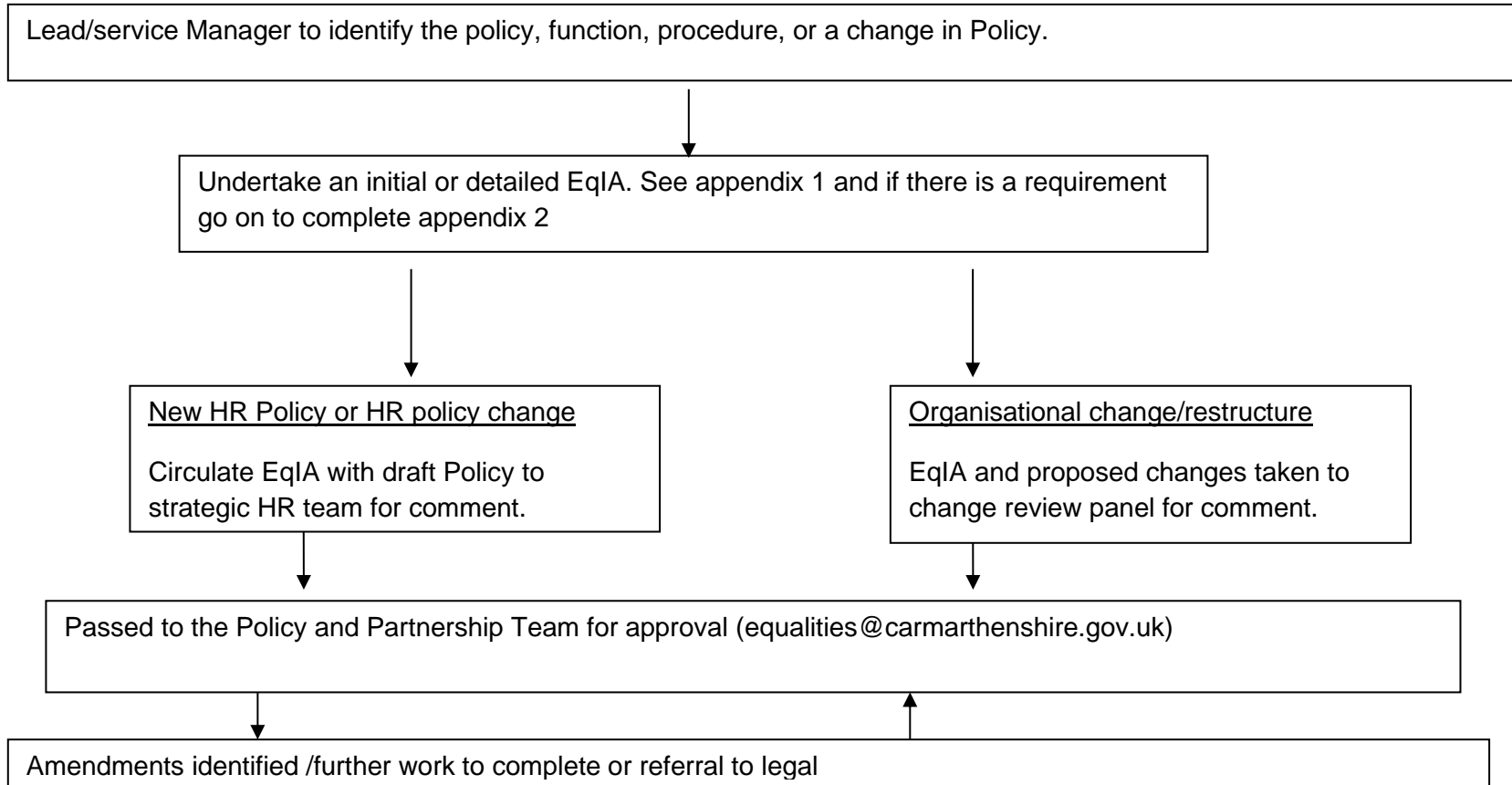
1.4   Reporting on assessments

Where it is clear from the assessment that the likely impact on the authority's ability to meet the general duty is substantial, then it must publish a report.

1.5   Initial and Detailed Equality Impact Assessments

The initial EqIA is a simple and quick method of assessing the effect of a policy, function, procedure, decision including financial cuts on one or more of the protected characteristics.

The Service Manager responsible for the relevant new or revised policies, functions, procedures, and financial decisions must undertake, at least, an initial EqIA and where relevant a detailed Equality Impact Assessment, must be attached as background paper with reports to Executive and Scrutiny.

1.6   Equality Impact Assessment – Process to follow where HR implications have been identified

Lead/service Manager to identify the policy, function, procedure, or a change in Policy.

Undertake an initial or detailed EqIA. See appendix 1 and if there is a requirement go on to complete appendix 2

New HR Policy or HR policy change

Circulate EqIA with draft Policy to strategic HR team for comment.

Organisational change/restructure

EqIA and proposed changes taken to change review panel for comment.

Passed to the Policy and Partnership Team for approval (equalities@carmarthenshire.gov.uk)

Amendments identified /further work to complete or referral to legal

2.   Initial Equalities Impact Assessment (rLDP)

Department: Forward Planning (Place & Sustainability – Environment)	Completed by (lead): Ian R Llewelyn	Date of initial assessment: January 2020 Revision Date: December 2022
Area to be assessed: (i.e., name of p*olicy, function, procedure, practice, or a financial decision)*	Carmarthenshire County Council Deposit Revised Local Development Plan (LDP) 2018–2033	
Is this existing or new function/policy, procedure, practice, or decision?	New Policy	
What evidence has been used to inform the assessment and policy? (please list only)		

In preparing this Plan, full regard has been had to a range of requirements and influencing factors including:

- Legislation – including the *Planning and Compulsory Purchases Act 2004*, *Planning (Wales) Act 2015*, *Well Being of Future Generations Act 2015*, *Environment (Wales) Act 2016* and European Directives;
- National Planning Policy;
- *Town and Country Planning (Local Development Plan) (Wales) (Regulations) 2015*;
- Carmarthenshire Well-being Plan and objectives – "the Carmarthenshire we want";
- Moving Forward in Carmarthenshire – The Council's New Corporate Strategy 2018 – 2023 (2019 update);
- Carmarthenshire Economic Recovery Plan (April 2021)
- Evidence gathered – including that on population and household projections; and

- Feedback and engagement.
- Baseline data collated in Appendix B (ISA)
- Plan, Policies, and Programmes contained within Appendix A (ISA)

The preparation of the Deposit rLDP has emerged from a robust approach in respect of gathering evidence and stakeholder engagement. There have been 12 meetings of the LDP Advisory Panel since November 2017 (up until consultation planned in January 2023). This Panel is drawn up from Elected Members and its primary purpose is to take political ownership of the Revised LDP. There has been a strong emphasis on engagement and consensus building. Since January 2018, there has also been:

- LDP Key Stakeholder Forum meetings;
- LDP workshop / seminar for Town and Community Councils;
- Developer Forum meetings;
- Several meetings and presentations with political groups;
- Regular reporting to the full County Council;
- Annual Monitoring Reports; and
- Publication of the Pre-Deposit Preferred Strategy for consultation (which was accompanied by an initial Equalities Impact Assessment).
- Online consultation to support and inform the identification of the Plan's issues vision and objectives, in addition to the initial Sustainability Appraisal and Habitats Regulations Assessment.

In January 2021, Natural Resources Wales (NRW) published evidence showing many riverine Special Areas of Conservation (SAC) waterbodies were failing phosphorous standards (e.g., Afon Teifi). In response, alterations to the Plan had to be made to ensure potential development followed nutrient neutrality in the

affected catchments. During this time, to ensure the Plan was current and robust, it was continually updated to reflect new evidence and information, and, therefore, other changes were also made for a variety of reasons.

| **1. Describe the aims, objectives or purpose of the proposed function/policy, practice, procedure or decision and who is intended to benefit.** | The Council is required under the provisions of the *Planning and Compulsory Purchases Act 2004* to prepare and have in place an adopted LDP. Its preparation and content is governed by legislation and procedural regulations. The current LDP was adopted in December 2014, however the Council resolved in January 2018 to commence work on a Revised LDP for the period 2018–2033.

Once adopted, the Revised LDP will be the land use plan for the County (excluding that area contained within the Brecon Beacons National Park) and, therefore, decisions will be based on its content unless material considerations indicate otherwise. The Pre-Deposit Preferred Strategy for the Revised LDP (The Strategy) was an important first stage of the Plan making process.

This Strategy contained several key elements, notably:
- Key Issues that the Plan seeks to contribute to addressing;
- A Vision for what Carmarthenshire will look like 2033;
- Strategic Objectives to address the issues and deliver the Vision;
- Growth Strategy concerning the number of houses and jobs required during the plan period;
- Spatial Strategy concerning the location of the proposed houses and jobs during the plan period;
- Strategic policies; |

The plan itself will build upon these elements further and additionally include specific policies; candidate development sites; implementation and monitoring; and proposal maps on a geographical basis, amongst other considerations.

The key issues associated with the proposed rationale were grouped under the national well-being goals which means that they are framed within the context of the *Well-being of Future Generations (Wales) Act 2015*. This ensured that social, economic, and environmental interests are embedded into the Plan making process. The issues highlight some of those notable challenges for the County, with further information available within the Issues, Vision, and Objectives Topic Paper (which was re-published in December 2019 as updated).

The vision directly incorporates the vision set out in the Council's Corporate Strategy "*Moving Forward in Carmarthenshire - the next 5 years 2018–2023*". Whilst there is no vision to directly draw upon from the Carmarthenshire Wellbeing Plan, the Revised LDP vision reflects its four well-being objectives which are (1) Healthy Habits (2) Early Intervention (3) Strong Connections and (4) Prosperous People and Places. A "One Carmarthenshire" approach recognises the need to balance conflicting demands and interests and provides a platform for consensus and shared ownership of the Revised LDP.

The Council has reached an important milestone with the publication of the Revised LDP for consultation in January 2022. The Deposit Revised LDP consists of several key elements which reflect stages in its preparation. It has sought to build on the preparation of, and consultation responses to, the Pre-Deposit Preferred Strategy. The recommendations of the Integrated Sustainability Appraisal – Strategic Environmental Assessment have also been responded to where appropriate. In this respect, engagement has, in accordance with the provisions of the Delivery Agreement, been an important aspect of the Strategy's preparation, with the contribution of technical consultees and other focused groups being instrumental in guiding the Deposit Plan's content.

A key element of the Deposit Plan is founded on the need for the Plan to make appropriate provision for a sustainable and deliverable level of growth - reflecting the ambitions of the County and meeting the needs of its communities. This has been supported by a robust and updated evidence whilst seeking to deliver on key strategic influences including:

- The Council's Strategic Regeneration Plan 2015 – 2030: Transformations;
- Swansea Bay City Deal – including Yr Egin and the Wellness and Life Science Village;
- The New Corporate Strategy 2018 – 2023;
- The Council's Well-being Objectives; and
- Recent Council resolutions – including the declaration of a Climate Emergency and the motion on Planning and the Welsh language;
- Rural Taskforce Report and recommendations;
- National planning policy and legislative agenda;
- Our Commitment to Affordable Homes 2015 – 2020 and Affordable Housing Delivery Plan 2016-2020;
- Building More Council Homes – 'Our ambition and plan of action';
- Moving Forward in Carmarthenshire: the next 5-years.

The LDP seeks to promote and develop the economy across Carmarthenshire and the Deposit Revised Plan identifies appropriate land allocations to reflect Carmarthenshire as an ambitious County which attracts investment and provides opportunities for those living and working in our communities and well as a key player within a Swansea Bay regional context.

The proposed growth levels would also seek to challenge and address current demographic patterns particularly the out-migration as evidenced in the 16-19 age group. It provides opportunities to balance the demographics of the

County through the retention of, and in-migration of younger adults (including those returning) to the County, and address some of the issues which could be perceived from an aging population.

In recognising the changing evidence base in relation to demographic change an addendum Report on Carmarthenshire's Population and Household Forecasts has been prepared. It identifies latest population and household projections reflecting the iterative nature of the Plan making process.

The spatial approach to the distribution of land represents a Balanced Community and Sustainable Growth Strategy, a revision to the approach in the current LDP and one which seeks to address the issues highlighted in the Review Report, as well as reflecting the feedback in the formulation of the preferred strategy. The revised spatial hierarchy and the distribution of growth will therefore be expressed through the settlement framework as grouped under respective clusters which seek to characterise areas across the County. These are identified within the Deposit Plan.

Key themes and policy areas set out within the revised deposit LDP include:

- Provide for the requirement of 8,822 new homes;
- To maximise affordable housing delivery providing for >1,000 new affordable homes. Note: this figure will be subject to further refinement ahead of the publication of the Deposit LDP. Additional evidence gathering in respect of viability and the impact on the affordable housing target and policies will also be ongoing;
- Provision for 71.21 ha of employment land;
- Defined levels of development viability;
- Identify levels of developer contributions (s106) and key priority areas;
- Recognise the economic opportunities to sustain and enhance rural economies;

	- Support regeneration and strategic ambitions for the County and region; - Promote a settlement framework which supports cohesion between settlements and communities; - Reflect the linguistic needs of the County and its communities and their cultural characteristics; - Distribute development in accordance with the settlement hierarchy, reflecting the principles of sustainability and the functional attributes of settlements; - Respect and enhance the rich and diverse environmental qualities of the County; - To reflect the need for new homes in rural areas; - Reflect matters of infrastructural capacity – notably within the Llanelli Waste Water Treatment Works catchment area; - Contribute towards the achievement of the statutory Conservation Objectives of the Caeau Mynydd Mawr Special Area of Conservation; - Contribute to the delivery of physical and social regeneration opportunities; - Create diverse and cohesive developments and communities; - Reflect the diversity across the County, and within its settlements and communities; - Focus retail change in established centres whilst providing opportunities which will assist in achieving viable, self-supporting settlements and sustainable communities; - Define search areas for the siting of wind and solar renewable energy developments; - Recognise the contribution of 'previously developed land'; - To provide opportunities to maximise on the County's visitor economy potential; - Protect and enhance the natural, historic, and built conservation qualities of Carmarthenshire; and, - Contribute to an integrated transport network both within the County and region.

	In taking the above forward, the Deposit LDP, its evidence base, and its contextual influences, includes several new policy areas and/or an additional focus on aspects around:
	• Placemaking and Well-being of future generations;
	• Green Infrastructure;
	• Climate Change and Sustainable Development;
	• The Welsh language;
	• Flood avoidance;
	• Reserve Regeneration Sites; and
	• Rural Planning Policy.
	The Deposit Revised LDP seeks to acknowledge and respond to changes in evidence and consider the emerging growth provisions of the emerging National Development Framework as it progresses through the reporting process. The Revised LDP will continue to develop as new evidence, policy guidance and legislation emerges. It should also be noted that further non-substantive amendments to the Plan and its supporting documents will be undertaken to ensure its content is complete ahead of the consultation on the Deposit LDP. It will also ensure the Plan is up to date and reflects the latest factual and evidential position.

The Public Sector Equality Duty requires the Council to have "due regard" to the need to:	**2. What is the level of impact on each group/ protected**	**3. Identify the risk or positive effect that could result for each of the group/protected characteristics?**	**4. If there is a disproportionately negative impact what**

(1) eliminate unlawful discrimination, harassment, and victimisation; (2) advance equality of opportunity between different groups; and (3) foster good relations between different groups (see guidance notes)	**characteristics in terms of the three aims of the duty?** **Please indicate high (H) medium (M), low (L), no effect (N) for each.**	**Risks**	**Positive effects**	**mitigating factors have you considered?**
Protected characteristics **Age**	H	The Plan fails to recognise the age profile of the County. It is noted within the key issues that Carmarthenshire has an ageing population.	The Plan seeks to re-balance the demographic profile of the County. This reflects the current trend in outmigration amongst younger age groups and a reliance on migration as the driver for population change. The Plan in seeking to re-balance the age profile provides for opportunities for a good working and living environment for all, creating prosperous and attractive communities. With	

			regards to the provision of new homes, there is an emphasis on a mix of housing types, including affordable homes orientated towards community need.	
	Disability	H	The Plan directs development to locations that are inaccessible.	The Plan seeks to direct development to sustainable locations which are accessible by through a range of transport means including public transport. The Plan has strong emphasis on equality. Specific reference is made to Strategic Objectives 4 and 10.	
	Gender reassignment	N		The Plan will seek to develop a land use framework which ensures opportunities for enhanced inclusivity.	

	Race	H	The Plan fails to recognise the needs of specific communities.	The Plan contains a land use framework which ensures opportunities for enhanced inclusivity. Reference is made to the needs of the Gypsy and Traveller communities within Carmarthenshire. In this respect the Plan makes specific provision for their needs through Strategic Policy SP9 and related detailed policies.	
	Religion/Belief	N		The Plan provides a land use framework which responds to the identified issues through its vision, strategic objectives and strategic policies which is inclusive of religion/belief or other social considerations.	
	Pregnancy and maternity	L		The Plan will seek to develop a land use framework which ensures opportunities for	

			enhanced inclusivity. The Plan seeks to integrate other plans and strategies and promoting accessibility to services.	
Sexual Orientation	N		The Plan will seek to develop a land use framework which ensures opportunities for enhanced inclusivity.	
Sex	N		The Plan will seek to develop a land use framework which ensures opportunities for enhanced inclusivity.	
Welsh language	H	The Plan fails to make adequate provision to promote and safeguard the interests of the Welsh language and	The Welsh language is explicitly covered in Planning Policy Wales and Technical Advice Note 20: Planning and the Welsh Language. Both provide appropriate guidance on how to	

| | | | aspects of linguistic sensitivity. | consider the Welsh Language in preparing an preparing LDP.

The Plan through its strategic objectives and Strategic Policy SP7 (and related detailed policies) make provision to support proposals which safeguard and promote the interests of the language.

The Council is also subject to the Welsh Language Standards. Reference is made to the Topic Paper and evidence prepared in relation to the Welsh language which is published alongside the deposit LDP. | |
| **Marriage/Civil Partnership** | N | | The Plan will seek to develop a land use framework which ensures opportunities for enhanced inclusivity. | |

	Any other area	The plan must have due regard to the social-economic duty.			

5. Has there been any consultation/engagement with the appropriate protected characteristics?

YES ☐   **NO** ☐   **N/A** ☒ **- In that the Deposit Plan is subject to full Public consultation (as was the Preferred Strategy).**

6. What action(s) will you take to reduce any disproportionately negative impact, if any?

The potential for any disproportionate impact will be monitored throughout the Plan making process. In this respect the Plan will be subject to continual iteration through to its adoption and will also be subject to the preparation of a Sustainability Appraisal which will also consider and make recommendations on its impacts both environmentally and socially. The Deposit Revised LDP will be accompanied by an Easy Read Version and a similar document was available alongside the Pre-Deposit Preferred Strategy. Additionally, the deposit Revised LDP and any accompanying materials will be available in other formats upon request.

7. Procurement

Following collation of evidence for this assessment, are there any procurement implications to the activity, proposal, service.

N/A

Please take the findings of this assessment into your procurement plan. Contact the corporate procurement unit for further advice.

8. Human resources

Following collation of evidence for this assessment, are there any Human resource implications to the activity, proposal or service? N/A		
9. Based on the information in sections 2 and 6, should this function/policy/procedure/practice or a decision proceed to Detailed Impact Assessment? (recommended if one or more H under section 2)	**YES** ☒	**NO** ☐

3. Detailed Equalities Impact Assessment (rLDP)

Department:	Forward Planning (Place & Sustainability – Environment)
Completed by (lead):	Ian R Llewelyn
Date of Detailed assessment:	December 2022
Area to be assessed: (*Policy, function, procedure, practice or a financial decision)*)	Carmarthenshire County Council Deposit Revised Local Development Plan (LDP) 2018–2033
Is this existing or new function/policy/Procedure/ practice	New Policy

1. Describe the aims, objectives or purpose of the function/policy, practice or procedure and who is intended to benefit.	Please see initial EqIA above.

2. Please list any existing documents, evidence, research which have been used to inform the Detailed equality impact assessment. (This must include relevant data used in this assessment**)**	Please see initial EqIA.
3. Has any consultation, involvement been undertaken with the protected characteristics to inform this assessment? (please provide details, who and how consulted)	Please see initial EqIA.
4. What is the actual/likely impact?	Within the initial assessment, potential High impacts were noted in relation to the following characteristics: **Age; Disability; Race; and the Welsh language.**

5. What actions are proposed to address the impact? *(The actions needs to be specific, measurable and outcome based)*	What are we going to do?	Who will be responsible?	When will it be completed?	How will we know we have achieved our objective?
	In terms of age, the Plan provides opportunities for retention of, and migration of younger adults into the County- most notably by delivering a minimum of new jobs. This Plan makes provision for a range of age groups recognising the diverse demographics across the County. Whilst the Plan does not specifically identify housing for the elderly or supported living these can (and are) accommodated and considered against the Plan's policy framework. The preparation of the Plan has been supported by	Elected Members and officers of the County Council and relevant service partners.	Plan to be adopted in 2023 and ongoing monitoring of implementation throughout the Plan period.	Adoption of the Revised LDP and then through the Annual monitoring of the Plan.

	engagement with a range of statutory and non-statutory bodies. This has included the integration of strategic community infrastructure within the Plan's policies and proposals.			
	In terms of disability, the Plan seeks to deliver developments that are accessible and integrated thus ensuring ease of access for all. Reference is made to Strategic Policy 12 & Policy PSD1.	Elected Members and officers of the County Council and relevant service partners.	Plan to be adopted in 2023 and ongoing monitoring of implementation throughout the Plan period.	Adoption of the Revised LDP and then through the Annual monitoring of the Plan.
	In terms of race, the Plan meets an identified need in terms of Gypsy and Traveller provision. Reference is made to Strategic Policy 10 & Policy GTP1.	Elected Members and officers of the County Council and relevant service partners.	Plan to be adopted in 2023 and ongoing monitoring of implementation throughout the Plan period.	Adoption of the Revised LDP and then through the Annual monitoring of the Plan.

	In terms of the Welsh language, the Plan seeks to promote the Welsh language and culture and is committed to contributing to the Welsh Government's long-term aim of achieving 1 million Welsh speakers by 2050. Reference is made to Strategic Policy 8, Policy WL1 & Policy PSD9.	Elected Members and officers of the County Council and relevant service partners.	Plan to be adopted in 2023 and ongoing monitoring of implementation throughout the Plan period.	Adoption of the Revised LDP and then through the Annual monitoring of the Plan.
6. How will actions be monitored?	The Council's elected Members have ownership of the Revised LDP. As a result, the progress being made on the introduction of the above actions, as well as the wider Revised LDP, will be scrutinised by Elected Members. Reference is also made to the Revised LDP Delivery Agreement between the Welsh Government and the County Council which sets out how the Plan will be prepared and in what timescale. The preparatory process of the Revised LDP requires that the Plan be subject to Independent Examination. Subject to the LDP Inspector finding the Plan sound, a key monitoring stage in the progress of the above actions will be the Council's adoption of the Revised LDP. It should be noted that the findings of the Inspector will be binding on the Council. Following the adoption of the Plan, the Council's focus will then turn to implementation. The Plan will form the basis of decision making within the LPA area. There is a requirement to prepare an Annual Monitoring Report, whilst there is also			

	a requirement for a review to be undertaken every 4 years. It should be noted that some of the above actions may be subject to a specific monitoring indicators.

4.   Review following subsequent amendments to the rLDP

This chapter will be updated accordingly.

Revised 2018-2033
Local Development Plan

Integrated Sustainability Appraisal (ISA)

2nd Deposit Plan
February 2023

Cyngor **Sir Gâr**
Carmarthenshire
County Council