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Revised 2018-2033
Local Development Plan

Initial Consultation Report

2nd Deposit
February 2023

Cyngor Sir Gâr
Carmarthenshire
County Council

Introduction

The requirement for Councils to prepare a Local Development Plan (LDP) is set out in the Planning and Compulsory Purchase Act 2004. One of the aims of the LDP is to make the development plan system more relevant, inclusive and engaging to local communities. Following adoption, the Revised LDP will replace the current adopted LDP for Carmarthenshire. The Revised LDP will provide the development strategy and policy framework for Carmarthenshire from adoption to 2033.

This consultation report builds on that prepared to accompany the publication of the 1st Deposit Revised LDP. It reflects the subsequent decision to prepare a 2nd Deposit in order reflect certain contextual issues that had arisen since the 1st Deposit Plan was published. In this respect it includes, for information, details of the responses received to the 1st Deposit and the focused changes proposed as a result of that consultation. It should be noted that the representations received to the 1st Deposit are not being carried forward as formal duly made comments but are presented here for information purposes. In addition, the focused changes as agreed by County Council on 13th January 2021 whilst informing the content of the 2nd Deposit were not subject to formal publication for consultation.

This Consultation report had been prepared in accordance with the requirements of Regulation 16A of the Town and Country planning (Local Development Plan) (Wales) (Amendment) Regulations 2015, and advice contained within the Local Development Plan (LDP) Manual Edition 3, and identifies:

- The steps taken to publicise and engage throughout the LDP preparation process and how this complies with the Community Involvement Scheme (CIS) contained in the Delivery Agreement (DA), including any deviation from it.
- The bodies engaged, notified and consulted at pre-deposit participation (Regulation 14) and pre-deposit consultation (Regulation 15).
- A summary of the main issues raised at the pre-deposit stages, including the total number of representations received and how these have influenced the preparation of the Deposit LDP
- An outline of the issues raised as part of the consultation associated with the 1st Deposit Revised LDP including total number of representations and how these were considered and how these informed the focused changes as originally proposed.
- A Summary of the comments received on the Candidate and Alternative Sites

This report will be updated following completion of the Deposit LDP stage and will form the Consultation Report which will be submitted in accordance with Regulation 22 (2) (c) of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.

Key Stages in LDP Preparation

The preparation of the LDP involves a number of key stages. It commenced with the original Delivery Agreement (DA) as agreed by the Welsh Government (WG) on 28 June 2018 and was originally scheduled to culminate in the adoption of the Plan, in November/December 2021. However, as a consequence of contextual issues notably: the public health challenges faced as a result of Covid-19 and the associated lockdowns; and, the publication of the Natural Resources Wales (NRW) Guidance on Phosphate levels in Riverine Special Areas of Conservation (SACs), this has resulted in the preparation being delayed.

At the meeting of County Council on the 9th March 2022 it was resolved to prepare a 2nd Deposit version of the Revised LDP as well as a Revised DA for agreement with the Welsh Government. Consequently, a Revised DA has been prepared and received Welsh Government Agreement on the 25th August 2022. This schedules the Plan for adoption in November/December 2024.

The Revised DA sets out the Authority's timetable for Plan preparation together with the Community Involvement Scheme (CIS) which identifies how and when individuals and organisations can/should become involved in the Plan making process.

The LDP has evolved and developed since its commencement in 2018, following the preparation of the LDP Review Report in respect of the current adopted LDP, and the Council's resolution to prepare the Revised LDP. To date the Plan has proceeded through Key Stages 1 – 3 as set out below, noting that a 1st Deposit Plan was prepared and consulted upon. This Initial consultation report accompanies Key Stage 4 and the preparation and publication of the 2nd Deposit Revised LDP.

The key stages in the preparatory process are as follows:

• Key Stage 1 – Delivery Agreement (LDP Reg. No. 5 -10)

• Key Stage 2 – Pre-Deposit – Preparation and Participation (LDP Reg. No. 14)

• Key Stage 3 – Pre-Deposit Public Consultation (LDP Reg. No. 15, 16)

• Key Stage 4 – Deposit Local Development Plan (LDP Reg. No. 17 - 21)

• Key Stage 5 – Submission to WG for Examination (LDP Reg. No. 22)

• Key Stage 6 – Independent Examination (LDP Reg. No. 23

• Key Stage 7 – Receipt and Publication of the Inspector's Report (LDP Reg. No. 24)

• Key Stage 8 – Adoption (LDP Reg. No. 25)

• Key Stage 9 – Monitoring and Review (LDP Reg. No. 37)

The following table sets out the key plan stages undertaken to date:

Key Stage	Dates undertaken
Delivery Agreement	Published for consultation – 5th February to 23rd March 2018 Agreed by the Welsh Government on the 28th June 2018
Call for Candidate Sites Candidate Site Register Call for Sand and Gravel Candidate Sites Call for Gypsy and Traveller Sites	5th February to 29th August 2018 Register published 12th December 2018 12th December 2018 to 8th February 2019 28th January to 8th April 2019
Comments on the Candidate Sites submitted	12th December 2018 to 8th February 2019

Pre-Deposit Preferred Strategy (and SA/SEA Initial Report and HRA Screening Report)	12th December 2018 to 8th February 2019
Publication and consultation of First Deposit Revised LDP and associated documents (including HRA and SA).	January 2020 – March 2020
3 week additional consultation on the First Deposit Revised LDP and associated documents.	September 2020 – October 2020
Preparation of Second Deposit Revised LDP	March 2022 – December 2022

The Delivery Agreement (DA)

The first requirement of the LDP preparatory process is the preparation of a DA. The DA represents a public statement of the Council's commitment to the preparation of the Revised LDP. It provides the timetable for the preparation of the Plan and through its Community Involvement Scheme (CIS) details how and when the Council will consult and engage with groups, organisations and individuals during the Plan's preparatory process. It also represents an agreement between Carmarthenshire County Council and the Welsh Government (WG) on how the Plan is to be prepared, including setting out:

• The timetable for the Plan's preparation through to adoption;

• The Community Involvement Scheme, including feedback mechanisms; and

• The resources the Council is committing to the preparation of the Plan.

The initial DA was made available for consultation from the 5th February to the 23rd March 2018 and publicised accordingly. Reference should be made to Appendix 1 in relation to the LDP Diary. Following due consideration of the responses received by County Council on the 13th June 2018, the draft DA was submitted to the WG for approval. The DA was agreed by the WG on the 28th June 2018.

Subsequent revisions to the DA have been undertaken to reflect the impacts of Covid-19 and subsequently the publication of the NRW Guidance on phosphate levels within protected Riverine SACs. The latest Revised DA was agreed by the WG on the 25 August 2022.

Delivery Agreement Compliance

Appendix 1 details the timetable for the Key Stages of the LDP Process and reflects the timetable as set out in the DA. This charts progress to date (up to the submission of the Deposit Revised LDP).

Community Involvement Scheme

This Community Involvement Scheme (CIS) sets out why it is important to involve the community. It identifies who should be involved and suggests how to get involved in the LDP process. It is vital in order to achieve a plan that has local ownership and legitimises

the policies that will shape the future distribution of land uses and development within Carmarthenshire.

Carmarthenshire can be characterised as a county of contrasts with the agricultural economy and landscape of rural Carmarthenshire juxtaposed with the urban and industrial south-eastern area. The diversity in population (including distribution, age, employment and culture) presents a challenging task in involving the community in the LDP process.

The CIS identified a number of existing ways in which the Council does and will engage and consult with the general public, and other parties. The approach seeks to maximise the audience for the LDP and increase opportunities for engagement. These are set out within section 3.4 of the Delivery Agreement with further details contained within the Revised LDP Diary (Appendix 1).

An extensive programme of engagement has been undertaken involving key stakeholders and members of the public. Events were held with key stakeholders and forums. These sessions helped to identify the key issues facing the County, consider the strategic options for the amount and location of growth, and establish the objectives for the future of the Plan area.

Pre Deposit Stages of the Plan

Introduction

This section outlines some of the key tasks undertaken as part of the pre-deposit element of the LDP process. This stage in Plan making fulfils a critical role in guiding the future shape and strategic direction of the Plan.

Some of the key components and tasks undertaken in respect of the Pre Deposit preparation and participation are as follows. Reference should be made to Appendix 1 in respect of the LDP diary for further details of scope and purpose and in respect of participants, publication and reporting dates.

The following list is not exhaustive:

• Evidence Gathering and review of data and baseline information (incl. the LDP Review Report, Annual Monitoring Reports, SA/SEA and HRA)

• Draft Sustainability Appraisal (SA) Scoping Report

• Key Stakeholder Forum (KSF)

• Town and Community Council Engagement

• Publication of Topic Papers

• Publication for Consultation of the Pre Deposit Preferred Strategy along with the SA/SEA Initial SA Report and the HRA Screening Report

• Publication of further evidence and topic papers

• County Council Members Sessions including LDP Advisory Panel, Drop in Sessions and attendance of political groupings

The key Pre-Deposit stages also included the Candidate Sites Process and the publication of the Preferred Strategy.

Key Stakeholder Forum (KSF) – Session 1

The first KSF was held in the St Peter's Hall, Carmarthen on the 23rd May 2018. The Event was facilitated by representatives of Planning Aid Wales alongside the Authority's Forward Planning Section. Delegate packs were provided to attendees.

Details of the session, presentations and feedback are contained within the KDF Feedback Report as published on the Revised LDP webpages. This can be viewed though the following link:

https://www.carmarthenshire.gov.wales/media/1216449/key-stakeholder-forum-meeting-23-05-18-c.pdf

Key Stakeholder Forum (KSF) – Session 2

The second KSF was held in the St Peter's Hall, Carmarthen on the 13th September 2018. The Event was facilitated by representatives of Planning Aid Wales alongside the Authority's Forward Planning Section. Delegate packs were provided to attendees.

Details of the session, presentations and feedback are contained within the KSF Feedback Report as published on the Revised LDP webpages. This can be viewed though the following link:

https://www.carmarthenshire.gov.wales/media/1216448/key-stakeholder-forum-meeting-130918.pdf

Candidate Site Stage

Between the 5th February and 29th August 2018, the Council sought a call for landowners, stakeholder, developers and members of the public to submit candidate sites for all land use development proposals within the County. The consultation was widely advertised and resulted in the submission of over 920 candidate site submissions. The candidate site register was published on the 12th December 2018. This was also made available on the Council's website with an opportunity for views to be submitted.

As part of the consideration of the candidate sites a series of technical and other consultees were contacted as part of the assessment process, most notably to identify any constraints that might impact upon the delivery of sites. The outcome of this process informed the selection of sites for inclusion within the 1st and 2nd Deposit Revised LDP.

Call for Candidate Sand and Gravel Sites

The 'call for sand and gravel sites' was undertaken between the 12th December 2018 and 8th February 2019, in response to Minerals Technical Advice Note 1 Aggregates which places a requirement to maintain adequate reserves for the Plan period. Whilst there is currently an adequate supply (in combination with Ceredigion and Pembrokeshire), the Regional

Technical Statement notes a potential shortfall in provision of sand and gravel resources (over a 15 year period).

In seeking to address the above, the 'call for sand and gravel sites' resulted in two submissions. Both focused on sites with existing extant planning permissions as follows:

Llwynjack farm, Llandovery – respondent C.J. Lewis
Cwmgwyn Farm, Llandovery – respondent D.A. Lewis

Call for Gypsy and Traveller Sites

The call for Gypsy and Traveller Sites was undertaken between the 28th January and the 8th April 2019. A total of 9 sites were submitted for consideration, all within the Llanelli area. The findings of these sites were considered in detail and were informed against the provisions of the site assessment methodology which was published in conjunction with the call for sites exercise.

Consultation on Sites Submitted on the 'Register of Candidate Sites'

In conjunction with the consultation on the Draft Preferred Strategy, a further consultation was undertaken on those sites submitted as part of the 'Call for Candidate Sites' held in 2018. This provided interested parties with an opportunity to lodge their views on the 926 candidate sites submitted.

As part of this process a significant number of representations were submitted amounting to circa 4,000. These were utilised where appropriate to inform the consideration and selection of sites for inclusion within the 1st Deposit LDP and subsequently in the preparation of the 2nd Deposit LDP. Responses received as part of the consultation on the Register of Candidate Sites were not subject to the democratic reporting process.

Pre-Deposit Preferred Strategy

The Revised LDP Preferred Strategy, together with its accompanying supporting documents, was published for formal consultation between the 12th December 2018 and the 8th February 2019. Letters and emails were sent to all consultees identified within the Delivery Agreement and those within the consultation database/mailing list.

The following documentation was made available for public inspection:

- Draft Pre-Deposit Preferred Strategy
- Draft Pre-Deposit Preferred Strategy – Easy Read Version
- Habitat Regulations Assessment Screening Report
- Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) – Initial Report: Non-Technical Summary
- Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) – Initial Report
- Candidate Site Register - Initial Assessment
- Carmarthenshire LDP Review Report
- Equality Impact Assessment – Preferred Strategy

- Tests of Soundness: Self-Assessment Preferred Strategy

Copies of the above documents were made available on the Council's LDP web-pages and at the following deposit locations:

- Customer Service Centre, 3 Spilman Street, Carmarthen
- The Hwb, Quay Street, Ammanford
- The Hwb, Stepney Street, Llanelli
- Planning Service Office, Municipal Offices, Llandeilo, and
- All public libraries during normal opening hours

This consultation also included an opportunity for comments to be submitted in respect of the register of candidate sites. The Review Report in respect of the current adopted LDP was also published for formal consultation in conjunction with the Draft Pre-deposit Preferred Strategy.

Copies of the responses were duly reported to County Council, together with updates to the strategic policies resulting from the Initial SA/SEA (ensuring positive iteration) on the 15th of May 2019. Copies of the responses together with the recommendations as endorsed by Council are available to view online.

In total some 346 representations were submitted across the range of consultation documents. These came from a range of bodies, organisations and individuals and are broken down as follows:

- Draft Preferred Strategy – 269 Representations

- Sustainability Appraisal/Strategic Environmental Assessment Scoping Report - 2 Representations and Initial Report – 11 Representations

- Habitat Regulations Assessment Screening Report – 62 Representations

- Carmarthenshire Local Development Plan Review Report – 0 Representations

- Call for Sand and Gravel Sites - 2 Representations

The relevant responses received during the Pre-Deposit Consultation (Preferred Strategy) identified a number of issues which the Council considered in detail and sought to address or provide clarification where necessary.

There were no representations received which the Council considered would significantly undermine the strategic approach set out within the Preferred Strategy. There were however a number which required specific amendments in relation to the Revised LDP as it progressed through to future stages. Other representations required further evidencing and subsequent inclusion as part of the content, policies and proposals of the Deposit LDP.

Preferred Strategy - Key Themes from Representations

As noted above, 269 representations were submitted in respect of the Draft Preferred Strategy. These submissions were from a wide range of respondents and offered constructive input for the Revised LDP as it progressed through its preparatory process.

Many of the comments received reflect that the preparation of the development plan is iterative in nature, with its content and the evidence base developing in response to changes in approach and guidance. In this respect, as the preparation of the revised LDP progresses toward the Deposit Plan, further detail will emerge and will be incorporated. Notable reference was made to the absence of the following evidence available at the time of the Draft Preferred Strategy. In this regard, the Welsh Government made reference to the need to strengthen the following:

- Renewable Energy Assessment.
- Local Housing Market Assessment.
- Updated Gypsy and Traveller Accommodation Needs Assessment.
- Welsh Language Impact.
- Housing Viability Evidence.
- Employment Growth and Economic Activity Evidence.

The importance of collaborative working across organisations also emerged as a consistent theme within the representations, including the need to work with landowners and developers to bring sites forward and to produce the necessary evidence to support their inclusion in the Plan.

Key themes to emerge relate back to elements of evidence in relation to the distribution of growth – including scale, type and location of development and how they relate to then outstanding evidence in terms of the Housing Market Assessment and the Rural Needs Surveys. In this respect, comments were received supporting the level of growth, whilst others challenged it with a view to raising or lowering the requirement.

Where representations relate to objections to the Preferred Strategy, these are predominately focused around the following themes:

- The level of growth identified within the Plan and its distribution to sustainable locations and settlements.
- Impact on the Welsh language - The consequence of the level/distribution of housing growth proposed on the Welsh language.
- The Plan should rectify the current LDP's failure to deliver as anticipated.
- Lack of clarity around the 6% flexibility identified within the Preferred Strategy.
- Locational relationship between homes and jobs – Greater articulation needed on the link between the plan's housing requirement and its target for jobs.
- Reference to Strategic Sites not coming forward.
- The lack of strategic focus on the contribution of Renewable Energy to the Plan was referenced. Indeed the issue was raised specifically by the Welsh Government in their response.
- The potential failure to identify the level of need for Gypsy and Traveller Sites and allocate a site or sites in the Deposit Plan to meet any identified need.

Some objectors have used the consultation as an opportunity to make comments in relation to specific sites or to promote opportunities for growth in specific settlements. It is noted that

the vast majority of comments did not raise matters or issues that resulted in a change to the Preferred Strategy. Where points were accepted, these in the main related to wording changes in policies rather than more fundamental amendments to the Plan. Please see Appendix 3a for the representations received and the officer comments and recommendations.

1st Deposit Revised LDP

The 1st Deposit Revised LDP, together with its accompanying supporting documents, was published for formal consultation between the 29 January 2020 and the 27 March 2020. This was supplemented by a further consultation period from the 11 September 2020 to 2 October 2020 reflecting the impact of the Covid Pandemic and the associated lockdown on the ability of the public and interested parties to access documentation contained within public buildings.

As part of the consultation a significant number of responses were received from a range of bodies, organisations, companies, communities and interested parties, with comments covering nearly all aspects of the Plan's content.

In total 1,508 responses were received in respect of the 1st Deposit Plan with 1,174 objecting to its content. Of the total number of representations circa 1,000 were in response to the inclusion or non-inclusion of a site within the Plan, whilst the remainder related to comments on the content of the written statement and matters of policy.

Key themes to emerge as part of the consultation were set out in the report to the meeting of County Council on the 13th January 2021. These key themes and the report, including representations and the proposed Focused Changes in can be viewed via the link below:

https://democracy.carmarthenshire.gov.wales/documents/g4100/Public%20reports%20pack%2013th-Jan-2021%2010.00%20County%20Council.pdf?T=10

Reference is made to the Covid – 19 Assessment prepared in conjunction with the Revised Delivery Agreement (as presented to County Council on the 22nd October 2020).

Letters and emails were sent to all consultees identified within the DA and those within the consultation database/mailing list.

The following documentation was made available for public inspection in accordance with the content of the DA.

- [First] Deposit Revised LDP
- Sustainability Appraisal / Strategic Environmental Assessment
- Habitats Regulations Assessment
- Delivery Agreement;
- Tests of Soundness Self Assessment
- Initial Consultation Report
- Equalities Impact Assessment
- Candidate Sites Register and Initial Assessment
- Preferred Strategy
- Topic Papers
- Evidence and supporting documentation

As part of the consultation a series of drop-in sessions were held across Carmarthenshire.

The events provided an opportunity for groups, organisations, interested parties and members of the public to discuss and learn more about the LDP from the Officers from the Forward Planning Section in attendance.

The events were held at the seven venues listed below. There were 2 sessions at each venue. Session 1 was from **10am to 1pm** and Session 2 was from **2pm to 7pm**.

Venues:

- Monday 3 February 2020: Llangadog Community Centre, Dyrfal Road, Llangadog, Carmarthenshire, SA19 9BR.

- Wednesday 5 February 2020: Room 3 - Ground Floor, Llanelli Town Hall, Town Hall Square, Llanelli, Carmarthenshire, SA15 3AH.

- Thursday 6 February 2020: Pontyberem Memorial Hall, Coalbrook Road, Pontyberem, Carmarthenshire, SA15 5HU.

- Monday 10 February 2020: Dinefwr Indoor Bowls Club, Manor Road, Ammanford, Carmarthenshire, SA18 3AP.

- Tuesday 11 February 2020: Dewi Meeting Room, The Gate, Pentre Road, St Clears, Carmarthenshire, SA33 4AA.

- Wednesday 12 February 2020: Aberduar Chapel Vestry, Bro Einon Road, Llanybydder, Carmarthenshire, SA40 9RT.

- Thursday 13 February 2020: Meeting Room 2, Carmarthen Library, 9 St Peter's Street, Carmarthen, Carmarthenshire, SA31 1LN.

Appendices

The full list of appendices to this report include the following:

Appendix 1 – Revised LDP Diary

Appendix 2 – Revised LDP Delivery Agreement (DA):

2a – Revised LDP Timetable (agreed by Welsh Government on 25 August 2022)

2b – Revised LDP DA responses (Report to County Council, 13 June 2018)

2c – County Council Minutes (13 June 2018)

Appendix 3 – Revised LDP Preferred Strategy (PS):

3a – Revised LDP PS Responses (Report to County Council, 15 May 2019)

3b – County Council Minutes (15 May 2019)

Appendix 4 – Habitats Regulations Assessment (HRA) Screening Report responses

Appendix 5 – Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) Scoping Report and Initial Report responses

Appendix 6 – County Council Minutes (13 January 2021) - Revised Carmarthenshire LDP Representations Received and Focused Changes (to the 1st Deposit Plan)

Appendix 7 – County Council Minutes (9 March 2022) – Revised Carmarthenshire LDP Next Steps and Revised Delivery Agreement

Appendix 8 - County Council Minutes (7 December 2022) - Revised Carmarthenshire LDP Draft Second Deposit

Appendix 1

Revised LDP Diary

Revised Carmarthenshire Local Development Plan Diary

2017

20th September	Consideration of AMR and authorisation to commence preparation of the Review Report by County Council. http://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CId=155&MId=934&Ver=4
19th October	LDP Review and Review Report discussed at Planning Committee. Officers provided an overview of the forthcoming process and chaired questions.
31st October	An invitation (via email) was sent to the LDP Advisory Panel Members informing them of the first Advisory Panel to be held on Thursday 9 November 2017 at 2 p.m. in Committee Room 1, 3 Spilman Street, Carmarthen. Accompanying the email was the Agenda and supporting papers.
7th November	Report on the LDP Review Report, the Delivery Agreement and the Site Assessment Methodology was forwarded to Democratic Services to be placed on the Council reporting cycle.
8th November	Meeting with representatives from the Welsh Government Economic Development Division to discuss employment sites within Carmarthenshire and how they are to be brought forward in the Revised LDP.
9th November	First Meeting of the LDP Review Advisory Panel (comprised of representative Local Council Members) at 2 p.m. in the Council Chamber, 3 Spilman Street, Carmarthen. The meeting enabled Planning Officers to report on the preparation of the Revised LDP, and for the Panel to provide feedback and recommendations. .
17th November	Second Meeting of the LDP Review Advisory Panel in the Council Chamber, 3 Spilman Street, Carmarthen.
27th November	LDP Review Report considered by Preliminary Executive Board.
18th December	LDP Review Report considered by Executive Board. It was **UNANIMOUSLY RESOLVED TO RECOMMEND TO COUNCIL:** to authorise the commencement of work on the preparation of a full revision of the Carmarthenshire Local Development Plan http://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CId=131&MId=1116&Ver=4

2018

10th January	LDP Review Report, Draft Delivery Agreement and Draft Site Assessment Methodology considered by County Council. http://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CId=155&MId=1133&Ver=4 **UNANIMOUSLY RESOLVED that the following recommendations of the Executive Board be adopted:** **"To authorise the commencement of work on the preparation of a full revision of the Carmarthenshire Local Development Plan;** **To publish the Carmarthenshire Local Development Plan Review Report;** **To grant officers delegated authority to make typographical or factual amendments as necessary to improve the clarity and accuracy of the report."** **"that the draft Delivery Agreement for the Revised Carmarthenshire Local Development Plan for a 6 week formal consultation be approved;** **That the commencement of the initial stages of the LDP preparatory process in advance of any agreement on the final Delivery Agreement be approved;** **That the content of the Draft Site Assessment Methodology be approved;** **To grant officers delegated authority to continue preparatory discussions and to make typographical or factual amendments, as necessary, to improve the clarity and accuracy of the Draft Delivery Agreement and to refine the usability of the Draft Site Assessment Methodology".**
19th January	Third Meeting of the LDP Review Advisory Panel in the Council Chamber, 3 Spilman Street.
2nd February	Presentation on the Local Development Plan to the Plaid Cymru Group in Pontyberem Community Hall.
5th February	Commencement of 'Invitation for Candidate Sites'. Interested parties are given the opportunity of submitting sites that they would like to see included in the Revised LDP.
5th February	Consultation commences on Revised LDP Delivery Agreement

21st February	Presentation on the Local Development Plan to the Labour Group in County Hall, Carmarthen.
7th March	Presentation on the Local Development Plan to the Labour Group in Spilman Street, Carmarthen.
8th March	Presentation on the Local Development Plan to the Public Services Board
12th March	Biteable video on delivery Agreement consultation shared on social media. Weblink no longer available.
16th March	Planning Agents event in Carmarthen Library. A presentation on the preparation process of the Revised LDP was given to Planning Agents, followed by a workshop and the opportunity for questions
19th March	Presentation on the Local Development Plan to the Independent Group in County Hall.
20th March	Biteable video on candidate sites consultation shared on social media Weblink no longer available.
23rd March	Closure of consultation on the Revised LDP Delivery Agreement.
8th May	LDP Advisory Panel meeting number 4, Council Chamber County Hall, Carmarthen
23rd May	First meeting of the LDP Key Stakeholder Forum – St Peter's Hall, Carmarthen. Purpose: to give a wide spectrum of organisations and groups with an interest in the future of Carmarthenshire the opportunity to help shape the LDP.
13th June	Revised Carmarthenshire Local Development Plan 2018-2033 Draft Delivery Agreement and Draft Supplementary Planning Guidance – Wind and Solar Energy Carmarthenshire Local Development Plan considered by County Council. Agenda for County Council on Wednesday, 13th June, 2018, 10.00 am (gov.wales) The Council was informed that the Executive Board, at its meeting held on the 30th April, 2018 (Minute 9 refers) considered a report on the council consulting on a Draft Supplementary Planning Guidance SPG on Wind and Solar Energy Carmarthenshire

County Council Local Development Plan, which had been prepared to support and elaborate on the policies and provisions of the adopted Carmarthenshire Local Development Plan prior to its formal adoption, reflecting the commitment set out within the LDP.

UNANIMOUSLY RESOLVED that the following recommendations of the Executive Board be accepted:

" that the Draft Supplementary Planning Guidance set out within the report be approved for formal public consultation for 6 weeks;

that the publication of the Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Guidance and the Landscape Capacity and Sensitivity Studies be approved as supporting documentation to the SPG and the forthcoming Revised LDP;

to authorise the Head of Planning to correct typographical, cartographical or grammatical errors, and to make amendments in order to enhance accuracy and clarity of meaning."

13th June

Revised Carmarthenshire Local Development Plan 2018-2033 Draft Delivery Agreement considered by County Council.

Agenda for County Council on Wednesday, 13th June, 2018, 10.00 am (gov.wales)

The Council was informed that the Executive Board at its meeting held on the 4th June, 2018 (Minute 20 refers) had considered a report on the Draft Delivery Agreement, produced in response to its decision on the 10th January, 2018 to formally commence preparation on a revised (replacement) Local Development Plan and following public consultation thereon which expired on the 23rd March, 2018. It was noted that subject to Council confirming the Draft Agreement, it would then need to be submitted to the Welsh Government for Approval. Subject to that approval, the Council would then have a period of 3.5 years to deliver the Plan by the 2021 deadline.

UNANIMOUSLY RESOLVED that the following recommendations of the Executive Board be adopted:

That the representations received be noted and the recommendations in respect of the Draft Delivery Agreement be ratified;

The amendments to the timetable be approved;

That the submission of the Delivery Agreement (inclusive of the report recommendations) to the Welsh Government for agreement be approved;

The extension of the consultation period for the submission of candidate sites to the 29th August, 2018 be noted".

22nd June	Online survey on issues, vision and objectives "Starting the Conversation" appears on the Council consultation page. This will be on there until August 10 2018
25th June	Presentation to the Independent Group – the purpose of the event was to identify the issues for the LDP.
28th June	Draft Delivery Agreement on the Revised LDP sent to the Welsh Government for approval. The Welsh Government agreed to the Delivery agreement by means of a formal letter via email on the same day. https://www.carmarthenshire.gov.wales/media/1215060/carmarthenshire-da-agreement-letter-replacement-ldp-web-sent-280618-eng.pdf
5th July	Developer Forum in St Peter's Hall, Carmarthen.
6th July	Delivery Agreement published on Carmarthenshire County Council website. https://www.carmarthenshire.gov.wales/media/1215059/delivery-agreement-agreed-by-welsh-government.pdf
9th July	Presentation to the Plaid Group – the purpose of the event was to generate issues.
17th July	LDP Advisory Panel meeting number 5.
30th July	Executive Board - Advisory Panel Minutes November 9 2017, November 17 2017 and January 19 2018, along with Terms of Reference, are reported to the Executive Board. http://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CId=131&MId=1238&Ver=4 The Executive Board considered the Terms and Reference of the Advisory Panel for the Carmarthenshire Revised Local Development Plan (LDP) 2018-2033 together with the minutes of the Panel's meetings held on the 9th and 17th November 2017 and the 19th January, 2018. **UNANIMOUSLY RESOLVED that the Terms and Reference of the Advisory Panel for the Carmarthenshire Revised Local Development Plan 2018-2033 together with the minutes of its meetings be received.**
30th July	LDP Town and Community Council seminar at Llandeilo Civic Hall.

29th August	Closing date for 'Invitation for Candidate Sites'.
13th Sep	Key Stakeholder Forum (KSF)2 in St Peter's Hall, Carmarthen.
20th Sep	Second Meeting of the Developers' Forum, St Peter's Hall, Carmarthen.
21st Sep	Community Scrutiny Committee
1st Oct	LDP Advisory Panel meeting number 6
26th Oct	LDP Advisory panel meeting number 7
12th Dec	Consultation starts on Preferred Strategy, SA, HRA, Review Report, Candidate Site Register, and Invitation for Sand and Gravel Sites.

2019

9th Jan	County Councillors were invited to attend Local Member drops in sessions to discuss the proposed revised LDP in respect of their wards. Individual meetings were also arranged for those Members unable to attend on 9 January.
8th Feb	Closing date of Consultation on Preferred Strategy, SA, HRA, Review Report, Candidate Site Register, and Invitation for Sand and Gravel Sites.
23rd Apr	Meeting with representatives from the Welsh Government (WG) in Carmarthen to discuss the WG's representations to the Revised LDP Preferred Strategy and other relevant issues.
24th Apr	LDP Advisory Panel meeting number 8.

15th May	County Council considered the recommendations of the Executive Board in respect of the Revised Carmarthenshire Local Development Plan 2018 – 2033 Draft Pre-Deposit Preferred Strategy Agenda for County Council on Wednesday, 15th May, 2019, 11.00 am (gov.wales) **RESOLVED that the following recommendations of the Executive Board be adopted:** **'THAT** **10.1 the representations received in respect of the Draft Pre-Deposit Preferred Strategy be noted and the recommendations ratified;** **10.2 the representations received in respect of the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Initial Report, Habitat Regulations Assessment (HRA) Screening Report and the LDP Review Report be noted and the recommendations ratified;** **10.3 delegated authority be granted to officers to:-** **· amend the Preferred Strategy in light of the recommendations emerging from the SA/SEA, HRA process and emerging evidence as part of the preparation of the Deposit LDP;** **· make non substantive typographical or factual amendments as necessary to improve the clarity and accuracy of the Delivery Agreement.'**
4th July	A presentation on the Revised LDP was made to the Independent Group.
11th Sep	A presentation on the Revised LDP was made to the Labour Group.
17th Sep	A presentation on the Revised LDP was made to the Independent Group.
24th Sep	LDP Advisory Panel meeting number 9.
10th & 18th Oct	County Councillors were invited to attend Local Member drops in sessions to view the proposed revised LDP settlement maps for their wards. Individual meetings were also arranged for those Members unable to attend on the 10th or 18th.
13th Nov	County Council considered the recommendations of the Executive Board in respect of the Revised Carmarthenshire Local Development Plan 2018 – 2033 Draft Deposit. Agenda for County Council on Wednesday, 13th November, 2019, 10.00 am (gov.wales) **UNANIMOUSLY RESOLVED that the following recommendations of the Executive Board be accepted:-** **"to consider and approve the content of the Draft Deposit Revised Local Development Plan 2018-2033 (and supporting documents) for formal public consultation;**

To grant officers delegated authority to make non-substantive typographical, cartographical and/or factual amendments as necessary to improve the clarity and accuracy of the Draft Preferred Strategy;

To approve the Draft Supplementary Planning Guidance in relation to the Burry Inlet and the Caeau Mynydd Mawr Special Area of Conservation for consultation concurrent with the Deposit LDP."

2020

29th Jan

Start of consultation period into First Deposit Revised LDP. The initial end date to the consultation was 4:30pm on 13th March, however this was extended to 27th March.

As part of the consultation a series of drop-in sessions were held across Carmarthenshire.

The events provided an opportunity for groups, organisations, interested parties and members of the public to discuss and learn more about the LDP from the Officers from the Forward Planning Section in attendance.

The events were held at the seven venues listed below. There were 2 sessions at each venue. Session 1 was from **10am to 1pm** and Session 2 was from **2pm to 7pm**.

Venues:

- Monday 3 February 2020: Llangadog Community Centre, Dyrfal Road, Llangadog, Carmarthenshire, SA19 9BR.
- Wednesday 5 February 2020: Room 3 - Ground Floor, Llanelli Town Hall, Town Hall Square, Llanelli, Carmarthenshire, SA15 3AH.
- Thursday 6 February 2020: Pontyberem Memorial Hall, Coalbrook Road, Pontyberem, Carmarthenshire, SA15 5HU.
- Monday 10 February 2020: Dinefwr Indoor Bowls Club, Manor Road, Ammanford, Carmarthenshire, SA18 3AP.
- Tuesday 11 February 2020: Dewi Meeting Room, The Gate, Pentre Road, St Clears, Carmarthenshire, SA33 4AA.
- Wednesday 12 February 2020: Aberduar Chapel Vestry, Bro Einon Road, Llanybydder, Carmarthenshire, SA40 9RT.
- Thursday 13 February 2020: Meeting Room 2, Carmarthen Library, 9 St Peter's Street, Carmarthen, Carmarthenshire, SA31 1LN.

24th March	National lockdown commences as a result of the Covid-19 pandemic.
27th March	Closure of consultation period into Deposit Revised LDP.
28th July	Virtual meeting: LDP Advisory Panel - meeting number 9.
11th Sep – 2nd Oct	Further 3 week consultation of Deposit Revised LDP. This additional consultation was undertaken due to the disruption caused by the Covid-19 pandemic on the last couple of weeks of the initial consultation on the Deposit Revised LDP (which ended on Friday 27th March 2020). In this respect, the Council acknowledged the impact that the lockdown period had on the consultation and the public's ability to contribute and make effective representations before the deadline.
22nd October	Council endorsement of revision to Delivery Agreement, including the 6/7 month slippage of LDP timetable as a result of the covid-19 pandemic.
10th November	Welsh Government endorsement of revision to Revised LDP Delivery Agreement.
12th November	Reporting of Deposit Representations to CMT.
30th November	Reporting of Deposit Representations to Preliminary Executive Board.
17th December	Reporting of Deposit Representations to Community & Regeneration Scrutiny Committee.
21st December	Reporting of Deposit Representations to Executive Board.

2021

5th January	Virtual meeting: LDP Advisory Panel meeting number 10.
13th January	Reporting of Deposit Representations received and Focused Changes to County Council: Agenda for County Council on Wednesday, 13th January, 2021, 10.00 am (gov.wales) **RESOLVED that the following recommendation of the Executive Board be accepted:-** **7.4.1 to endorse the officer recommendations on the consultation responses received to the Deposit Revised LDP, Sustainability Appraisal, Habitat Regulations Assessment and Supplementary Planning Guidance;** **7.4.2 to agree to the presentation of the schedule of Focused Changes to Executive Board for approval for a minimum 6-week public consultation;** **7.4.3 to approve the submission of the Deposit LDP and its supporting documents, evidence and background documents as required to the Welsh Ministers for Examination;** **7.4.4 to grant officers delegated authority to respond to recommendations and requests arising from the Inspector as part of the Examination and hearing sessions;** **7.4.5 to resolve to adopt the SPG in relation to Caeau Mynydd Mawr SAC and the Burry Inlet (subject to the outcome of the Examination) concurrent with the adoption of the Revised LDP;** **7.4.6 to grant officers delegated authority to make non-substantive typographical, cartographical and/or factual amendments to improve the clarity and accuracy of the Revised Local Development Plan and its supporting documents".**
21st January	Publication of Guidance by Natural Resources Wales (NRW) on Phosphate levels in Riverine Special Areas of Conservation (SAC)
Ongoing	Stalled Revised LDP process due to the issue of Phosphate levels in Riverine Special Areas of Conservation (SAC)
17th November	Informal Cabinet meeting – update on stalled Revised LDP process and how the phosphates issue is being addressed, provided by Forward Planning Manager.
16th December	A report providing an update on the Revised Carmarthenshire LDP – Next Steps and Revised Delivery Agreement was presented to Corporate Management Team (CMT).

2022

7th February	The report providing an update on the Revised Carmarthenshire LDP – Next Steps and Revised Delivery Agreement was approved at the meeting of Pre-Cabinet.
14th February	The report providing an update on the Revised Carmarthenshire LDP – Next Steps and Revised Delivery Agreement was approved at the meeting of Cabinet.
9th March	The report providing an update on the Revised Carmarthenshire LDP – Next Steps and Revised Delivery Agreement was approved at the meeting of County Council: Agenda for County Council on Wednesday, 9th March, 2022, 10.00 am (gov.wales) **RESOLVED that the following recommendations of the Cabinet be adopted:-** **"9.1 To provide delegated authority to officers to amend the Revised Delivery Agreement timetable and agree its content with the Welsh Government;** **9.2 To consider the content of the report and endorse the need to prepare a consolidated second Deposit Revised LDP and associated documents;** **9.3 To grant the Director of Environment, in conjunction with the Cabinet Member for Planning, delegated authority to establish the Afon Tywi Nutrient Management Board (NMB), develop its terms of reference and prepare a Nutrient Management Plan;** **9.4 In conjunction with other key public bodies, to join the membership board for the Afon Teifi, Afon Cleddau and River Wye NMB's"**
25th August	Revised Delivery Agreement approved by Welsh Government.
19th October	Meeting of the LDP Advisory Panel.
20th October	Revised Carmarthenshire LDP – Draft Second Deposit agreed by the Council's Corporate Management Team (CMT).
14th November	Revised Carmarthenshire LDP – Draft Second Deposit agreed by Cabinet.
30th November	Meeting of the LDP Advisory Panel

7th December	Revised Carmarthenshire LDP – Draft Second Deposit agreed by County Council: Agenda for County Council on Wednesday, 7th December, 2022, 10.00 am (gov.wales) **RESOLVED that the following recommendations of the Cabinet be adopted:** **6.1 To approve the content of the Draft Second Deposit Revised Local Development Plan 2018 – 2033 (and supporting documents) for formal public consultation.** **6.2 To approve the rolling forward of the Draft Supplementary Planning Guidance in relation to the Burry Inlet and the Caeau Mynydd Mawr Special Area of Conservation for adoption concurrent with the Revised LDP.** **6.3 To note the Draft Briefing Note on the emerging Economic and Housing Growth Report and agree the recommended revised Growth Option.** **6.4 To grant officers delegated authority to make any typographical or factual amendments as necessary in order to enhance clarity of meaning.**

Appendix 2

Revised LDP Delivery Agreement (DA):

2a – Revised LDP Timetable (agreed by Welsh Government on 25 August 2022)

2b – Revised LDP DA responses (Report to County Council, 13 June 2018)

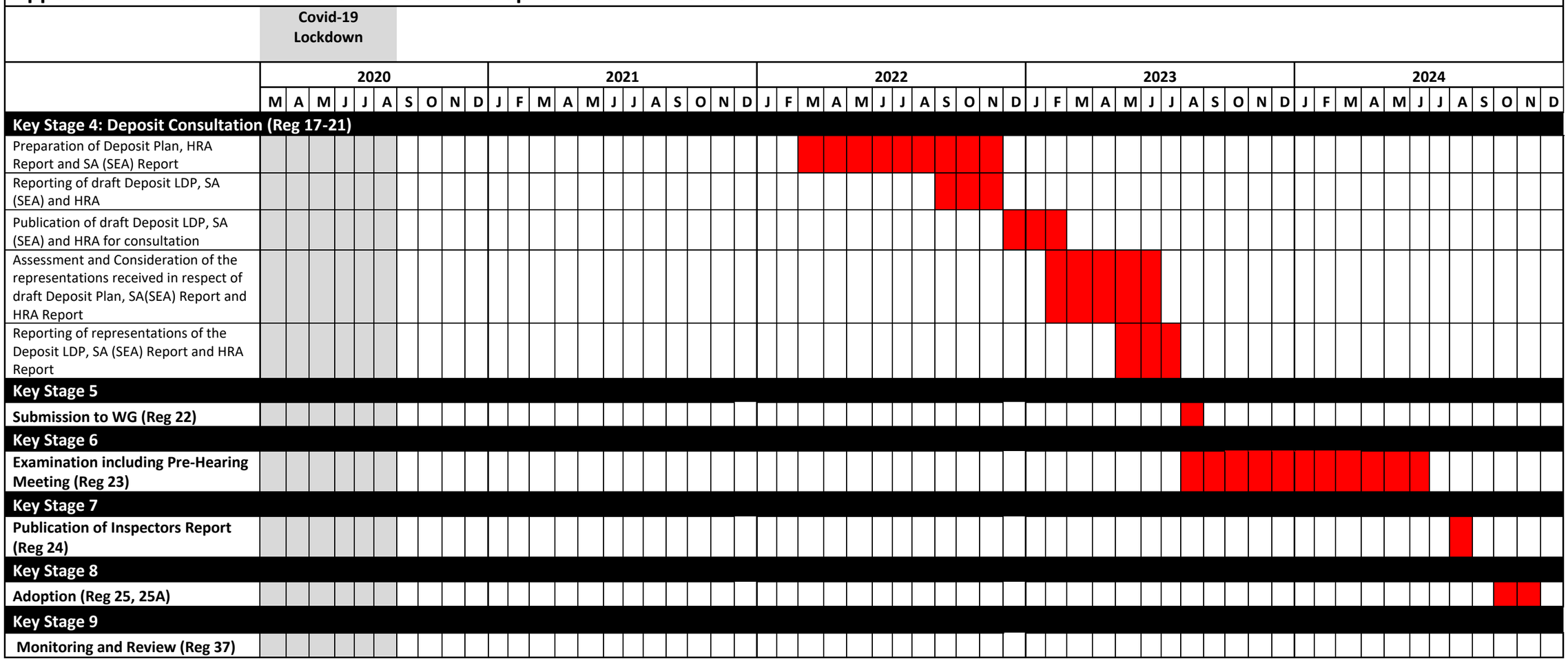
2c – County Council Minutes (13 June 2018)

Appendix 2a

Revised LDP Timetable

(agreed by Welsh Government on 25 August 2022)

Appendix 1: Revised Carmarthenshire Local Development Plan - Timetable



Appendix 2b

Revised LDP DA responses (Report to County Council, 13 June 2018)

Appendix 1

Draft Delivery Agreement – Consultation Responses

The following responses we're received during the consultation period held between the 5th February and 23rd March 2018 in respect of the Draft Delivery Agreement for the Revised Carmarthenshire Local Development Plan 2018 – 2033. Where appropriate each representation is accompanied by the comments received (summarised where appropriate) along with officer comments and recommendations.

Representation No: **DA/001**

Name: **W Thomas**

Organisation (where applicable): **N/A**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **YES**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **YES**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **YES**

Comment: **Mae'r amserlen yn dynn o gofio bod angen trafod gyda nifer sylweddol o randdeiliaid.**
The timetable is tight given that there is a need to discuss with a significant number of stakeholders.

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **YES**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **YES**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **YES**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **YES**

Question 4 - Additional Comments/suggestions:
None

Officer Response
Wedi nodi. Er ei bod wedi nodi bod proses paratoi'r Cynllun Datblygu Lleol (CDLl) a'i amserlen ar gyfer ei pharatoi yn cynnwys nifer o gyfnodau allweddol gan gynnwys y rheiny pan fydd ymgysylltiad yn arbennig o bwysig. Mae'r amserlen gyfan ar gyfer paratoi'r CDLl Diwygiedig wedi ei seilio ar gyngor wrth Lywodraeth Cymru a'r cyfnodau sydd wedi eu gosod yn y rheoliadau statudol. Dylid nodi bod yr amserlen yn cynnwys elfennau sydd wedi ei gosod yn gadarn, yn enwedig o gwmpas yr Archwiliad Cyhoeddus pan mae ychydig o ddisgresiwn gyda'r awdurdod i wneud addasiadau pellach.

Noted. Whilst it is noted that the LDP's preparatory process and its timetable for preparation includes a number of key stages including those where engagement is of particular importance. The overall timescale for its preparation of the Revised LDP is based upon Welsh Government advice and the stages set out within the statutory regulations. It should also be noted that the timetable includes fixed timetabling elements, notably around the Examination in Public where there is limited discretion for the authority to make further adjustments.

Recommendation

Dim newid i'r Cytundeb Cyflenwi. Modd bynnag, dylid cyfeirio at y 'newidiadau arfaethedig y swyddogion' sydd wedi eu gosod yn yr adroddiad yma. Gweler Atodiad 2.

No change to the Delivery Agreement. Reference should however be had to the 'Officer Proposed Changes' as set out within this report. See Appendix 2.

Representation No: **DA/002**

Name: **F Jones**

Organisation (where applicable): **West Wales Rivers Trust**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **YES**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **YES**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **YES**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **NO**

Comment: **The West Wales Rivers Trust is not listed within the list of consultation bodies.**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **YES**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **NO**

Comment: **Environmental Non-Government Organisations should be represented on the stakeholder group - Wales Environment Link can nominate a person.**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **NO**

Comment: **The West Wales Rivers Trust should be included in the list of consultation bodies.**

Question 4 - Additional Comments/suggestions:
None

Officer Response
Noted. The preparatory process associated with the Revised LDP and the Delivery Agreement is recognised with the value of the Environment and central in the preparation of the Revised LDP and its policies and proposals.

Whilst it is agreed to add The West Wales Rivers Trust to the list of consultation bodies. It is not considered necessary to further add to the membership of the Key Stakeholder Forum as sufficient representation is currently included to facilitate a discussion across a range of groups.

Recommendation
Amend the Delivery Agreement by adding The West Wales Rivers Trust to the list of consultation bodies.

Representation No: **DA/003**

Name: **C Peters-Bond**

Organisation (where applicable): **N/A**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **No**

Comment: **If the document is aimed at members of the public, then the plan is dense, full of jargon and relatively impenetrable.**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **YES**

Comment: **If you can get through the language used to describe it.**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **YES**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **YES**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **YES**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **YES**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **YES**

Question 4 - Additional Comments/suggestions:
The respondent states that the lack of a coordinated development plan with adjoining Councils is a mistake. While a long list of potential consultees have been listed, it's not clear how their views will effectively influence the plan which appears quite inward looking.

Officer Response
Noted. Whilst it is recognised that some aspects around the content of the Delivery Agreement may not be entirely Plain English its content in places reflects the often technical nature of its content. The Council will however be preparing an 'easy read' publication to support the use of the Revised LDP.

The value attached to working with neighbouring Council's is reflected in the Welsh Governments Tests of Soundness against which the appropriateness of the Revised LDP will be measured and assessed. In this respect the neighbouring authorities within the region have a long standing and close relationship with collaboration and information sharing an important part. This remains and each neighbouring authority are a specific consultee in plan making and have representatives on the Key Stakeholder Forum. Reference is made to section 1.8 of the Draft Delivery Agreement.

Recommendation
No change to the Delivery Agreement.

Representation No: **DA/004**

Name: **J Rollinson**

Organisation (where applicable): **J4mRoll Solutions**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **YES**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **YES**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **YES**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **YES**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **YES**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **YES**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **YES**

Question 4 - Additional Comments/suggestions:
None

Officer Response
Noted

Recommendation
No change to the Delivery Agreement.

Representation No: **DA/005**

Name: **M. Lindsley**

Organisation (where applicable): **The Coal Authority**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **N/A**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:
Note comments submitted in light of the Review Report. Having had an opportunity to review the Review Report and note that no fundamental changes are proposed to the mineral or unstable land policies, although these policies will respond to any contextual, evidential or factual changes arising. On this basis we have no specific comments to make at this time.

Officer Response
It is noted that the comments received predominately relate to the content of the Review Report. The respondent remains a consultee in the preparation of the Revised LDP.

Recommendation
No change to the Delivery Agreement.

Representation No: **DA/006**

Name: **G Ayres**

Organisation (where applicable): **Carmarthenshire County Council**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **N/A**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:
Page 4, paragraph 1.4.1 - There is reference here to 'the Council's Well-being Plan'. The respondent wishes to confirm that the Well-being Plan is the responsibility of the PSB and not the Council. Could this be amended?

Page 4, Soundness tests questions – Whilst appreciating that these questions are probably set at a national level the respondent points out that the questions relating to Single Integrated Plan (SIP) will not be relevant after May 2018 as all Counties will have replaced their SIPs with well-being plans from May 2018 onwards.

Page 13, paragraph 3.3.3 - Key Stakeholder Forum - There is reference to 'existing Community Strategy Partnership'. This require clarification.

Page 16, paragraph 3.4.3 - Seldom Heard Groups – Highlights the opportunity to access some such groups through other Council resources.

Page 17, paragraph 3.4.6 - Town and Community Councils – Reference is made to the existing network (forum) and the current 7 town and community councils subject to the Act. Highlights that this is a forum with the Clerks and Development Officers from those councils and not directly with the Community Councillors. Suggests that there is an opportunity to utilise such a forum. Makes reference to the requirement for these Councils from 2019 onwards to prepare an annual report to the PSB on how they're working to achieve the objectives of the well-being plan.

Page 46, Appendix 7 – Key Stakeholder Forum - Amend 'Carmarthenshire Local Health Board' to 'Hywel Dda University Health Board'.

Notes Dyfed Powys Police are named twice. The Police and Crime Commissioner is now responsible for all Police estates.

Officer Response
Noted. The respondent's points in relation to the tests of soundness are noted however, these reflect that material issued by the Welsh Government. The Revised LDP will however have full regard to the Well-being Plan once it supersedes the SIPs.

Welcomes the respondent's comments in respect of assisting in accessing a number of groups and forums is welcomed. Reference is made to paragraph 3.4.9 in respect of engaging with Town and Community Councils, including the forum identified.

The inclusion of Dyfed Powys Police and the Police and Crime Commissioner is intended to reflect the diversity of responsibilities and the range of contribution they can make to the Revised LDP's preparations

Recommendation
Amend paragraph 3.3.3 to ensure it is up-to-date and reflective of current provisions.

Amend paragraph 1.4.1 to clarify that the Well-being Plan is the responsibility of the Public Service Board.

Amend Appendix 7 to change 'Carmarthenshire Local Health Board' to 'Hywel Dda University Health Board'

Representation No: **DA/007**

Name: **S Luke**

Organisation (where applicable): **Natural Resources Wales**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **N/A**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:
The respondent agrees with the proposed 'proposed schedule of works' as set out within the draft DA.

The respondent has no further comments.

Officer Response
Noted and welcomed.

Recommendation
No change to the Delivery Agreement.

Representation No: **DA/008**

Name: **S Morris**

Organisation (where applicable): **Pembrokeshire County Council**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **N/A**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:
The respondent notes that the proposals are for a replacement Plan which will run to 2033, which corresponds with that for the proposed Pembrokeshire replacement LDP. Comments that this is helpful, particularly in the context of the letter from Lesley Griffiths AM, which proposed a Joint LDP for Carmarthenshire, Pembrokeshire and Ceredigion. Although the three authorities are currently moving ahead with proposals for single-authority LDP reviews, it is wise for each to align its review procedures and co-ordinate evidence preparation wherever possible.

Paragraphs 1.8.2 and 1.8.3 set out Carmarthenshire's position on Joint Plans and on the desirability of collaborative / collective work with neighbour Local Planning Authorities, wherever opportunities allow. The respondent supports Carmarthenshire's views in this respect.

The respondent supports their inclusion as a member of the Key Stakeholder Forum and its listing as a Specific Consultation body for the LDP. The respondent highlights that it will be pleased to contribute throughout the process of preparing the LDP.

In referencing Table 2 the respondent notes that the timescale is set out as being September 2018 – June 2020. Should this read September 2019 – 2020?

Officer Response
Support Welcomed.
The comments in relation to collaboration and co-ordination of evidence is welcomed.

Recommendation
Amend table 2 of the Delivery Agreement as appropriate (reference should also be had to the proposed amendments set out within Appendix 2 of this report).

Representation No: **DA/009**

Name: **E W Evans**

Organisation (where applicable): **Llangennech Community Council**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **N/A**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:
The respondent makes a general comment in respect of the Revised LDP highlighting that they have resolved to oppose any further development in Llangennech. Further comments/observations will be made during stages of the preparation of the Revised LDP.

Officer Response
Noted

Recommendation
No change to the Delivery Agreement.

Representation No: **DA/010**

Name: **Not identified**

Organisation (where applicable): **Not identified**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **YES**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:
None

Officer Response
Noted

Recommendation
No change to the Delivery Agreement.

Appendix 2c

County Council Minutes (13 June 2018)

COUNTY COUNCIL MINUTES
WEDNESDAY, 13 JUNE 2018

8.8. REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN 2018 - 2033 DRAFT DELIVERY AGREEMENT

The Council was informed that the Executive Board at its meeting held on the 4th June, 2018 (Minute 20 refers) had considered a report on the Draft Delivery Agreement, produced in response to its decision on the 10th January, 2018 to formally commence preparation on a revised (replacement) Local Development Plan and following public consultation thereon which expired on the 23rd March, 2018. It was noted that subject to Council confirming the Draft Agreement, it would then need to be submitted to the Welsh Government for Approval. Subject to that approval, the Council would then have a period of 3.5 years to deliver the Plan by the 2021 deadline.

UNANIMOUSLY RESOLVED that the following recommendations of the Executive Board be adopted:

"That the representations received be noted and the recommendations in respect of the Draft Delivery Agreement be ratified;

The amendments to the timetable be approved;

That the submission of the Delivery Agreement (inclusive of the report recommendations) to the Welsh Government for agreement be approved;

The extension of the consultation period for the submission of candidate sites to the 29th August, 2018 be noted".

Appendix 3

Revised LDP Preferred Strategy (PS):

3a – Revised LDP PS Responses (Report to County Council, 15 May 2019)

3b – County Council Minutes (15 May 2019)

Appendix 3a

Revised LDP PS Responses (Report to County Council, 15 May 2019)

Section 1. Introduction

Section 1. Introduction

Section 1. Introduction

Representation(s) ***Nature***

1994 **National Grid Company plc. (Lucy Bartley) [2586]** **Comment**

Summary:

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Response / Recommendation

Comment noted.

Paragraph 1.1

Representation(s) ***Nature***

675 **Lynda James [3039]** **Comment**

Summary:

The Letitia Cornwallis Trust, established 1790's located of the A40 at Llanwrda would like to be considered for inclusion as a candidate site for using the 3.5 acres to create a community hub. This would include restoration of the Georgian Alms House, renovation of the Georgian School and associated buildings and consider using some of the land at the rear of the property to build (yet to be refined in detail) units, homes, affordable, self builds etc. whilst maintaining the large recreational area and the existing quality play equipment.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Representation(s) ***Nature***

810 **Natural Resources Wales (Miss Sharon Luke) [3253]** **Support**

Summary:

NRW welcome the opportunity to comment on the Draft Pre-Deposit Preferred Strategy.

Response / Recommendation

Comments noted / support welcomed. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.

Section 3. What is in the Preferred Strategy?

Paragraph 3.1

Representation(s)		*Nature*
677	**Lynda James [3039]**	**Support**

Summary:

The respondent requests the site be considered for inclusion. Reference should be made to representation 675

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process

Section 4. Influences on the Plan

Section 4. Influences on the Plan

Section 4. Influences on the Plan

Representation(s) ***Nature***

1779 **Mineral Products Association Wales (Mr Nick Horsley) [3778]** **Object**

Summary:

We believe the Regional Technical Statement and the Welsh Marine Plan should be added to the list of documents referred to

Change To Plan Sought:

Amend the text to include the Welsh Marine Plan & the Regional Technical Statement.

Response / Recommendation

Noted. The comments by the respondent in respect of 'Section 4. Influences on the Plan' are duly noted. Any amendments to wording will be considered as part of the preparation of the Deposit LDP.

Paragraph 4.5

Representation(s) ***Nature***

1759 **City & County of Swansea (Mr Tom Evans) [3761]** **Comment**

Summary:

The Swansea LDP is at an advanced stage and adoption of the plan is due to be considered at Council on 28th February 2019. The cross boundary implications of the following policies will therefore need to be taken into account in the deposit plan and reflected appropriately in the SA and HRA process.
* Strategic Site Allocation SD A - South OF Glanffrwd Road, Pontarddulais and associated developer requirements (Policy SDH, Appendix 5, Appendix 3, Infrastructure Development Plan)
* Strategic Site Allocation SD H and associated development requirements for provision of park and ride at Gowerton Station
* Non-Strategic Site allocations under Policy H1 at Gorseinon and Loughor - impact on water quality and highways network. (see H1.30/H1.19/H1.25/H1.32)
* RP 4 - Water Quality
* EU1 - Renewable and Low Carbon Energy Developments - See Solar Search Areas on Proposals Map - located to east of Pontarddulais. See also Swansea's Renewable Energy Assessment May 2018 (ED072)
* ER 5: Special Landscape Areas -(See Proposals Map)
* ER 7 - Undeveloped Coast - protection of the seascape from Swansea's undeveloped coast
* HC 3: Welsh Language Sensitive Area (See Proposals Maps)
* RP12: Sand and Gravel Resources
* RC5 District Centres: See Pontarddulais, Gorseinon, Loughor and Gowerton District Shopping Centres

Response / Recommendation

Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.

Representation(s)		*Nature*
1749	**City & County of Swansea (Mr Tom Evans) [3761]**	**Support**

Summary:

The commitment to work with neighbouring LPAs (at section 4.5) is welcomed. We are keen to work collaboratively over the plan preparation process to ensure that all relevant local trans-boundary issues and in-combination effects are addressed and that a sound basis is laid for the future preparation of any Strategic Development Plan for our region. The key topic areas where cross-boundary/regional working is required are considered to be:
a) Transport, air quality
b) Spatial distribution of growth/candidate site selection.
c) Water Quality/Burry Inlet and Loughor Estuary CBEEMs
d) Local transboundary effects in SA Scoping Report
e) Swansea LDP Policies, Designations, Allocations with Cross Boundary implications.

The comments and suggestions we have provided are surrounding these themes and relate to the relevant sections of the Preferred Strategy, SA Report, HRA Report and relevant Topic Papers

Response / Recommendation

Support welcomed. The Council looks forward to continuing its constructive dialogue with the respondent along as the Plan making process proceeds towards the Deposit LDP.

Paragraph 4.6

Representation(s)		*Nature*
678	**Lynda James [3039]**	**Support**

Summary:

The "vision" of Letitia Cornwallis Trust includes maintenance of the recreational area and perhaps use of some of the assets to provide gym or changing room facilities. There have also been discussions with Calon Cymru which include the possibility of a cycle link between Llanwrda and Llansadwrn.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Section 5. Carmarthenshire - Strategic Context

Paragraph 5.2

Representation(s)		*Nature*
701	**Mr Gerwyn Thomas [3248]**	**Comment**

Summary:

it is vital that the distinctive character of our local communities are maintained and are not assimilated into neighboring communities, otherwise there is a very real danger of community identity being irreversibly lost with social cohesion and "community" itself being destroyed.
It's the feeling of belonging to and being part of a particular community that is the key to a healthy community and to risk destroying that by merging communities is unnecessary and irresponsible.
Reference is made to candidate site submission in the Llanelli / Bryn area

Response / Recommendation

Noted. The Revised LDP will be prepared in accordance with the provisions of PPW Ed. 10 and the councils Site Selection methodology. The reference to the candidate sites by the respondent is not a matter for consideration within the Draft preferred Strategy. Rather this will be considered as part of the preparation of the Deposit Plan.

Paragraph 5.3

Representation(s)		*Nature*
534	**Mr Owen Williams [3158]**	**Object**

Summary:

- Growth estimates for the County are based upon the City-Region Deal without consideration of any critical sources. Any plan, no matter what, must be based on the EVIDENCE whether it is critical or not. Consideration must be given to research suggesting city deals may not result in the gains promoted by the deal-makers
- how will city deal success be measured/evaluated? Should be some measuring mechanism to understand quickly whether the LDP is based on flawed assumptions

Change To Plan Sought:

- Conduct critical assessment of the effects of the City-Region Deal and adjust the LDP accordingly
- Revise down economic and population growth estimates to ensure a deliverable and achievable plan
- Create mechanisms and measures to understand and track progress on criteria concerning the success/failure of the City-Region Deal in Carmarthenshire

Response / Recommendation

Noted. It is accepted that the Preferred Strategy incorporates and recognises the benefits and contributions that may accrue from the City Deal. However, it is not the sole basis for the strategic approach or growth requirements set out within the Plan. Indeed in terms of growth the potential from the City Deal whilst an informant is not the only driver for growth within Carmarthenshire. For example in terms of job creation the Councils own Transformation Strategy. This is also reflected in the selection of the strategic option which represents a hybrid approach understanding the varied nature of the County.

The respondent concerns in relation to the City Deal failing to deliver the growth anticipated is noted. In this respect the Deposit LDP will contain a monitoring framework. This will include a series of measures and triggers to assess the success or otherwise of the Plan in delivering its policies. We will continue to have constructive dialogue with partners including those within the City as appropriate to ensure the Plan remains up to date.

In addition as the Plan progresses through its preparatory stages it will respond to changes in circumstances as appropriate.

Paragraph 5.6

Representation(s)		*Nature*
679	**Lynda James [3039]**	**Comment**

Summary:

Letitia Cornwallis Trust is located close to the A40. It has experienced considerable loss of local resources, firstly the post office, then the school and now the remaining local public house has proven unsustainable in current times. Trustees aim to make use of its assets to provide some part time restaurant/bistro services (as Cym Dda) as well as a replacement service for meals on wheels. If proven viable (a feasibility study is in hand) then facilities could be provided for young people/children/toddlers to replace the loss of togetherness/community relating to the closure of the local school.

Response / Recommendation

Noted. This relates to a detailed matter which is beyond the remit of the Preferred Strategy.

Paragraph 5.7

Representation(s)		*Nature*
1365	**Darren Hall [526]**	**Comment**

Summary:

I hope that the existing allocations with regard to SLA designation are maintained and that these sites are offered the same protection and consideration as other designated sites.

Response / Recommendation

Comments noted. Strategic Policy 13 provides the overarching framework for the natural environment, whilst SP 11 provides for consideration of high quality design. The consideration of whether any Special Landscape Areas will be identified in the Revised LDP, along with any resultant evidential facets, will be a matter for the deposit LDP.

Representation(s)		*Nature*
682	**Lynda James [3039]**	**Comment**

Summary:

Cornwallis House is a Grade 2 listed building.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Paragraph 5.12

Representation(s)		*Nature*
685	**Lynda James [3039]**	**Support**

Summary:

Letitia Cornwallis "vision" if agreed and implemented could help create some jobs thereby keeping or attracting younger people to help address the current imbalance between the older and younger peoples.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Paragraph 5.13

Representation(s)		*Nature*
1379	**Darren Hall [526]**	**Object**

Summary:

The projection for LDP 2018-2033 requirements needs to be based on up-to-date predictions. Based on previous timelines updated projections/publications are were/are due in 2017/2018.
Clearly outdated information and an 'adventurous' attitude towards development and growth within the county, need to be tempered and controlled and based on a cautionary outlook.
These targets, whilst set at a pre-deposit stage are the fundamental drivers and ultimately clauses that enable uncontrolled, undesired and more importantly unrequired development, in areas that cannot support the infrastructure requirements and will simply not recover from the impacts of such developments.

Change To Plan Sought:

please see representation and summary.

Response / Recommendation

Disagree. The Council is proposing a "Balanced Community and Sustainable Growth Strategy" which is underpinned by a robust evidence base and has been subject to consensus building - notably through the Key Stakeholder Forum. In terms of the growth figures, the strategy seeks to provide balanced growth centred on the delivery of our communities' needs and the delivery of the region and the Council's strategic and regeneration objectives.

Paragraph 5.15

Representation(s)		*Nature*
687	**Lynda James [3039]**	**Comment**

Summary:

Cornwallis House is located next to the old part of the A40 at Llanwrda and has plenty of space for parking both on the "estate" and on the old A40.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Paragraph 5.17

Representation(s)		*Nature*
688	**Lynda James [3039]**	**Support**

Summary:

Buses run every hour from the bus stop next to Cornwallis land thus connecting Llanwrda with Llandovery , Llandeilo and Carmarthen.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Section 6. Issues Identification

Paragraph 6.6

Representation(s) ***Nature***

811 **Natural Resources Wales (Miss Sharon Luke) [3253]** **Comment**

Summary:

The list of summary issues in Section 6.6 appear reasonable and we have no further suggestions

Response / Recommendation

Comments noted / support welcomed.

Representation(s) ***Nature***

689 **Lynda James [3039]** **Comment**

Summary:

The Letitia Cornwallis "vision" fits with and thereby enables resolution of some of the issues identified i.e building affordable housing (no need to buy land) and providing and maintaining some employment and the provision of a large space for recreational purposes.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Representation(s) ***Nature***

1059 **Cai Parry [822]** **Comment**

Summary:

The respondent supports Issues 18 & 19 in paragraph 6.6 which relates to the recognition of the lack of new homes being built in some areas, and the lack of a five year supply of housing and the need for a housing mix.

However, the respondent states that Issue 1 in paragraph 6.6 should be amended to link the delivery of the projects in Llanelli and Carmarthen associated with the Swansea Bay City Deal with the delivery of housing.

Response / Recommendation

Comments noted. Support welcomed for issues 18 and 19 of paragraph 6.6.
In regard to the respondents comment on Issue 1 of Paragraph 6.6, links with other areas of the Plan such as housing growth, will be further analysed during preparation of the Deposit LDP and linkages will be made between associated sections where appropriate.

Representation(s) ***Nature***

1665 **Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]** **Support**

Summary:

We note and welcome the inclusion of issue 23 regarding infrastructure capacity to support development. The availability of our infrastructure capacity is a key element in ensuring sustainable and viable development sites.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
9	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

The issues section is well balanced as are the strategic objectives. From an Economic Development perspective the mention of city deal, town centres, rural area growth (including employment opportunities), a buoyant visitor economy, urban and rural deprivation, poverty, infrastructure capacity, lack of employment opportunities, broadband and public services in rural areas, a sense of place and disused buildings in the issues section is welcomed.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1680	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

The list of summary issues in Section 6.6 appear reasonable and have no further suggestions. We specifically support the inclusion of the following issues:
* Risks from flooding and the challenges presented by climate change.
* Biodiversity designations ranging from international to local level.
* An ecological footprint that is currently exceeding sustainable levels.
* Rich landscape and townscape qualities.
* Beauty peace and quiet, open green spaces and fresh air are contributors to happiness in rural areas.
* Need to promote energy efficiency in proposed and existing developments.
These appear to correlate well with the findings of the SA.

Response / Recommendation

Support welcomed

Representation(s)		*Nature*
1776	**Mr John Morris [3777]**	**Support**

Agent: LRM Planning (Mr. Michael Rees) [3002]

Summary:

We are supportive of the vision for Carmarthenshire, however we are strongly of the view that it should specifically add "where the needs of residents are met" to the vision.

Importantly, meeting the needs of residents will be key to achieving the wider Wales Well Being Goals in particular helping to create a more equal wales, a more prosperous Wales, a more resilient Wales and a Wales of cohesive communities, as well as in meeting the requirements of the new PPW10 and the provision of the right development in the right place. Indeed, meeting needs in an appropriate and sustainable manner can contribute towards:
- Growing our economy in a sustainable manner;
- Making best use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities; and
- Limiting environmental impact.

Response / Recommendation

Noted. The Revised LDP is being prepared in full accordance with the provisions of the Wellbeing of Future Generations Act and PPW. The respondent's comments in relation to need is noted and the Plan will be consistent with national planning policy and the principles of sustainability in this regard, as well as recognising the characteristics of the County and its communities.

Representation(s)		*Nature*
611	**Ifan Beynon-Thomas [3198]**	**Support**

Summary:

I support the fact that one of the 33 summary issues references 'a buoyant visitor economy with potential to grow'. It is vitally important that the LDP policies recognise the important contribution that tourism makes to the economy of the County and that indeed there is scope for additional facilities.

Response / Recommendation

Support welcomed.

Section 7. A Vision for 'One Carmarthenshire'

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Representation(s) | ***Nature***

2099 **Union Tavern Estate [3913]** | **Comment**

Agent: Barton Willmore (Joe Ayoubkhani) [646]

Summary:

We support the LDP's vision which seeks to ensure that the Draft Preferred Strategy is positive and sufficiently aspirational. It is imperative that the policies of the LDP enable this vision to be met - for example, through providing sufficient housing growth to underpin the confident and ambitious economic aspirations of the Council.

Response / Recommendation

Support Welcomed

Paragraph 7.3

Representation(s) | ***Nature***

690 **Lynda James [3039]** | **Support**

Summary:

Without sustainable rural communities the country side would decline with an impact on the related tourism. The Letitia Cornwallis Trust aims to revitalize what was a once vibrant small community which despite its recent resource losses still presents a well cared for and loved community. The recent revival of the Trust's activities have led to many local people volunteering to help in achieving a greater sense of community.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

One Carmarthenshire

Representation(s) | ***Nature***

265 **RWE Innogy UK Ltd (Miss Eleri Davies) [471]** | **Object**

Summary:

Although 'Renewable Energy' is included in the graphic associated with the 'Our Vision - One Carmarthenshire' section of the Preferred Strategy (Easy Read Version), the 'Vision' fails to mention climate change, energy or anything vaguely relevant to the renewable energy sector.

Construction of the Brechfa Forest West Wind Farm in Carmarthenshire saw approximately £40 million of the total £105 million capex spent in Wales, with a further £459,200 per annum paid into a community benefit fund for the lifetime of the wind farm (up to 25 years). This demonstrates the significant investment opportunities available from onshore wind farms.

Change To Plan Sought:

'Our Vision- One Carmarthenshire' should include specific reference to climate change and the need to secure a low carbon future, which shall include (amongst other measures) renewable energy.

Response / Recommendation

Disagree, it is implicit that renewable energy will be integral in the creation of sustainable communities, there is no need for a specific reference as this is the vision for the Plan.

Representation(s)		*Nature*
612	**Ifan Beynon-Thomas [3198]**	**Object**

Summary:

I consider that the 'One Carmarthenshire' approach should recognise that Carmarthenshire should be a place to visit and enjoy as well as 'start, live and age well'. This would ensure that boosting tourism is considered as one of the key objectives of the Plan. This would accord with the fact that Strategic Objective 13 seeks 'to make provision for sustainable & high quality all year round tourism related initiatives.'

Change To Plan Sought:

The 'One Carmarthenshire' approach should recognise that Carmarthenshire should be a place to visit and enjoy as well as 'start, live and age well'.

Response / Recommendation

Agreed in part. Add the following words at the end of paragraph 1 of the Vision so it reads "...valued and respected for residents and visitors alike"

Representation(s)		*Nature*
1061	**Cai Parry [822]**	**Support**

Summary:

Support the Vision for 'One Carmarthenshire' including references to economic objectives and the City Deal.

Response / Recommendation

Support Welcomed.

Section 8. Strategic Objectives

Paragraph 8.2

Representation(s) ***Nature***

1681 **Natural Resources Wales (Miss Sharon Luke) [3253]** **Support**

Summary:

We welcome the recognition that the Well Being of Future Generations Act 2015 was a driver to review the Adopted LDP's Strategic Objectives and the utilisation of the Carmarthenshire Well Being Plan wellbeing objectives to group the Revised LDP's Strategic Objectives.

We are satisfied with the Revised LDP Strategic Objectives as noted in Section 8.6.

Response / Recommendation

Support welcomed

Paragraph 8.3

Representation(s) ***Nature***

812 **Natural Resources Wales (Miss Sharon Luke) [3253]** **Comment**

Summary:

We welcome the recognition that the Well Being of Future Generations Act 2015 was a driver to review the Adopted LDP's Strategic Objectives and the utilisation of the Carmarthenshire Well Being Plan wellbeing objectives to group the Revised LDP's Strategic Objectives.

We are satisfied with the Revised LDP Strategic Objectives as noted in Section 8.6.

Response / Recommendation

Comments noted / support welcomed

Paragraph 8.6

Representation(s) ***Nature***

1682 **Natural Resources Wales (Miss Sharon Luke) [3253]** **Support**

Summary:

We are satisfied with the Revised LDP Strategic Objectives as noted in Section 8.6.

Response / Recommendation

Support welcomed.

Representation(s) ***Nature***

813 **Natural Resources Wales (Miss Sharon Luke) [3253]** **Support**

Summary:

We are satisfied with the Revised LDP Strategic Objectives as noted in Section 8.6.

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

692 **Lynda James [3039]** | **Support**

Summary:

Also the "vision" of the Letitia Cornwallis Trust.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Paragraph 8.6 - SO6

Representation(s) | *Nature*

2040 **Persimmon Homes West Wales (Mrs Kate Harrison) [3410]** | **Comment**

Summary:

The respondent notes that this objective makes reference to encouraging the reuse of previously developed land. This approach falls in line with Planning Policy Wales Edition 10, however in order to achieve the construction of 10,480 new homes in the county, the respondent states that consideration should be given to Greenfield sites on the edge of sustainable settlements.

Response / Recommendation

Noted. The identification and selection of sites will be conducted in a manner consistent with PPW Ed.10 and the site search sequence. In this regard reference is made to PPW paragraph 3.41.

Representation(s) | *Nature*

1666 **Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]** | **Support**

Summary:

The availability or capacity of infrastructure is a key aspect in determining the sustainability of a settlement, therefore we support the inclusion of SO6.

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

1063 **Cai Parry [822]** | **Support**

Summary:

BDW Homes is supportive of the wording of Strategic Objective SO6 which seeks to ensure that "The principles of spatial sustainability are upheld by directing development to sustainable locations with access to services and facilities...". This Strategic Objective is therefore consistent with the 'Key Planning Principles' set out within Planning Policy Wales (Edition 10, p. 18) which seek to ensure that the planning system contributes to the long-term economic well-being of Wales, by making use of existing infrastructure and facilities.

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

1653 **Simon Chaffe [855]** | **Support**

Summary:

The respondent supports Strategic Objective SO6 -
'To ensure that the principles of spatial sustainability are upheld by directing development to sustainable locations with access to services and facilities and wherever possible encouraging the reuse of previously developed land.'

Response / Recommendation

Support welcomed.

Paragraph 8.6 - SO7

Representation(s) | *Nature*

266 **RWE Innogy UK Ltd (Miss Eleri Davies) [471]** | **Object**

Summary:

In the context of making a significant contribution towards tackling the cause and adapting to the effect of climate change, Strategic Objective 7 (SO7) correctly refers to promoting the efficient use and safeguarding of resources but fails to reference renewable energy generation which is a fundamental element of the Welsh Government's 'Energy Hierarchy for Planning' (paragraphs 5.714 - 5.715 and Figure 9, Planning Policy Wales, Edition 10, December 2018), namely Reduce Energy Demand, Use Energy Efficiently, Renewable Energy Generation, Minimise carbon impact of other energy generation, Minimise extraction of carbon intensive energy materials.

Change To Plan Sought:

Revise wording of SO7 to include reference to "renewable energy generation" as an integral part of the strategic objective to make a significant contribution towards tackling the cause and adapting to the effects of climate change.

Response / Recommendation

Agreed. Include reference to renewable energy within strategic objective SO7.

Paragraph 8.6 - SO10

Representation(s) | *Nature*

1777 **Mr John Morris [3777]** | **Comment**

Agent: LRM Planning (Mr. Michael Rees) [3002]

Summary:

We are supportive of the vision for Carmarthenshire, however we are strongly of the view that it should specifically add "where the needs of residents are met" to the objectives. Importantly, meeting the needs of residents will be key to achieving the wider Wales Well Being Goals in particular helping to create a more equal wales, a more prosperous Wales, a more resilient Wales and a Wales of cohesive communities, as well as in meeting the requirements of the new PPW10 and the provision of the right development in the right place. Indeed, meeting needs in an appropriate and sustainable manner can contribute towards:
- Growing our economy in a sustainable manner;
- Making best use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities; and
- Limiting environmental impact.

Response / Recommendation

Noted. The Revised LDP is being prepared in full accordance with the provisions of the Wellbeing of Future Generations Act and PPW. The respondent's comments in relation to need is noted and the Plan will be consistent with national planning policy and the principles of sustainability in this regard, as well as recognising the characteristics of the County and its communities.

Representation(s)		*Nature*
1068	**Cai Parry [822]**	**Object**

Summary:

BDW Homes suggests that the wording of Strategic Objective SO10, which refers to the delivery of new housing, should be reconsidered to make reference to delivering an appropriate number of new homes to meet society's needs - as well as an appropriate mix. One of the key issues within the 'Active & Social Places' theme within Planning Policy Wales (p. 44) is the need to ensure that "there is sufficient housing land available to meet the need for new private market and affordable housing". SO10 should therefore be amended in line with this key issue.

Change To Plan Sought:

Make specific reference to delivering an "appropriate number of new homes".

Response / Recommendation

Agreed in part. Amend SO10 to include reference to an appropriate number as well as mix of new homes.

Paragraph 8.6 - SO14

Representation(s)		*Nature*
1667	**Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**	**Support**

Summary:

The availability or capacity of infrastructure is a key aspect in determining the sustainability of a settlement, therefore we support the inclusion of SO14.

Response / Recommendation

Support welcomed.

Section 9. Strategic Growth & Spatial Options

Section 9. Strategic Growth & Spatial Options

Section 9. Strategic Growth & Spatial Options

Representation(s) ***Nature***

1635 **Welsh Government (Mr Mark Newey) [13]** **Comment**

Summary:

Growth Levels: Homes & Jobs
The authority has explored six population based growth scenarios and two employment-led scenarios. The authority has concluded the WG-2014 based projections would result in low levels of housing growth impacting negatively on demographic change (population decline) and ability to support economic growth. The 2014-based Principal and 10 year migration variant projections would result in a dwelling requirement of 3,367 and 6,542 respectively. The Council's preferred growth option is 'PG Long Term' which is predicated on significant internal and international migration flow assumptions averaging 1,423 persons pa for the sixteen year period 2001/02-2016/17. This period takes into account the high migration levels prior to 2008, and lower net migration following the recession. This is particularly relevant in this context as deaths exceed births; net migration being the dominant driver of population change. The PG Long Term Scenario results in a dwelling requirement of 9,887 dwellings (659 p/a) over the plan period. This is based on a 3.4% vacancy rate (VR) (adjusted from 6.3% Census VR) which takes into account recent data on second and empty homes. This is a deviation of 6,520 dwellings above the WG-2014 based principal projection and 3,345 dwellings above the 10-year migration variant. The proposed housing requirement of 9,887 is a substantial reduction of 5,310 dwellings from a requirement of 15,197 homes in the current adopted plan.
The evidence also explains that the jobs led scenario(s) tested would result in a requirement for 17,000 - 20,000 homes over the plan period. The Council has stated that this would result in an undeliverable and unsustainable growth strategy. Recent housing completions based on 10 year average JHLAs figures are approximately 500 d/pa. In summary, the Council has chosen a demographic led scenario that will contribute to the delivery of the Council's economic aspirations. The population increase targeted by the PG Long Term Scenario would result in supporting the creation of 5,295 jobs (353 p/a) over the plan period. The authority must fully justify/evidence that the growth levels are directed to the most sustainable places, related to the scale and location of housing need, not impacting negatively on the Welsh language and is realistic and deliverable. You should also demonstrate the growth strategy is compatible with the aspirations of neighbouring authorities and provides the most sustainable locations for growth for the wider area. See comments on spatial strategy.

Response / Recommendation

Noted, the scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP.
Matters in relation to the Welsh language will be considered as part of the LDP's evidence base and within the Sustainability Appraisal. See representation 1647.

Paragraph 9.1

Representation(s) ***Nature***

2429 **Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370]** **Object**

Summary:

The respondent raises potential issues relating to the use of economic and regeneration data used to inform the level of housing growth needed in the County. The representation refers to the anticipated sources and location of future jobs growth and note their concerns that some pertinent matters such as Brexit, Arfor, rural employment and the future of the Wellness Village, have not been fully considered.

Response / Recommendation

Comments are noted. Further evidence will be produced to inform the economic needs of the County and its impacts upon the County's housing needs.

Paragraph 9.8

Representation(s) | *Nature*

1070 **Cai Parry [822]** | **Support**

Summary:

Council's approach for calculating housing requirement is consistent with Planning Policy Wales.

Response / Recommendation

Support welcomed.

Paragraph 9.15

Representation(s) | *Nature*

693 **Lynda James [3039]** | **Comment**

Summary:

Agree with the conclusions but possible consequence of Brexit are not included, understandably as nobody as yet knows what is going to happen. However the differences in the way house prices are changing may be an indication that young people will move away from the South East of the UK where housing in any form is mostly unaffordable by individuals on an average income.
Apart from that general comment, Cornwallis "vision" does imply opportunities for employment in a rural community which is near to the local cottage hospital at Llandovery.

Response / Recommendation

Comment noted - site specific matters are considered as part of the candidate site process. In relation to Brexit, any potential implications will be monitored and suitably acknowledged in due course. It should be noted that Key issue 32 of the Draft Pre Deposit Preferred Strategy does acknowledge emerging national and regional considerations - including brexit.

Paragraph 9.23

Representation(s) | *Nature*

1766 **Savills (Mr Nick Heard) [3216]** | **Comment**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

A total of seven population-led and employment-led growth options are considered with the Draft Preferred Strategy ultimately adopting the 'Population Growth Long Term' scenario which sets a total requirement of 9,887 units across the 15 year RLDP period, equating to 658 per year. The use of a trend based projection rather than a single base dated population projection is considered the most appropriate and sensible mechanism given the differences between the last four sets of projections.

Response / Recommendation

Comments Noted. The Council considers that the population and household projection is based on a sound and reasonable assessment, by identyfing a number of factors which influence it. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow. The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.

Paragraph 9.29

Representation(s)

Nature

1767 **Savills (Mr Nick Heard) [3216]**

Object

Agent: Savills (Mr Nick Heard) [3216]

Summary:

The Population Growth Pre-Recession Scenario which is based on pre-2008 recession levels of in-migration shows a higher housing need than the Population Growth Long Term scenario but is dismissed as being 'undeliverable and unsustainable'. The Williams Family suggest that there is an opportunity to be more positive and even if the housing need is not based on this projection in its entirety, there is scope for an allowance to be made for a more positive economic context in the future.

Response / Recommendation

Comments Noted. The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow. The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.

Paragraph 9.40

Representation(s)

Nature

638 **Simrock Holdings Ltd [3217]**

Comment

Agent: Savills (Mr Nick Heard) [3216]

Summary:

The Population Growth Pre-Recession Scenario which is based on pre-2008 recession levels of in-migration shows a higher housing need than the Population Growth Long Term scenario but is dismissed as being 'undeliverable and unsustainable'. SHL suggest that there is an opportunity to be more positive and even if the housing need is not based on this projection in its entirety, there is scope for an allowance to be made for a more positive economic context in the future

Response / Recommendation

Comment Noted. The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow. The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.

Representation(s) | *Nature*

1584 **The Williams Family . [3585]** | **Comment**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

The Population Growth Pre-Recession Scenario which is based on pre-2008 recession levels of in-migration shows a higher housing need than the Population Growth Long Term scenario but is dismissed as being 'undeliverable and unsustainable'. It is suggested that there is an opportunity to be more positive and even if the housing need is not based on this projection in its entirety, there is scope for an allowance to be made for a more positive economic context in the future.

Response / Recommendation

The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow.

Paragraph 9.41

Representation(s) | *Nature*

2041 **Persimmon Homes West Wales (Mrs Kate Harrison) [3410]** | **Support**

Summary:

The respondent is supportive of the divergence from the Welsh Government 2014 based projections which would equate to a housing requirement of 6,542 over the plan period (2018-2033) as this is unlikely to support the Council's Visions and Objectives in relation to meeting the employment needs of the area and contributing at a regional level to the delivery of the Swansea Bay City Deal.

The respondent supports the preferred growth option of 'Population Growth Long Term' would provide a housing requirement of 9,887 dwellings over the plan period and as stated in the preferred strategy, 'allow the flexibility to drive sustainable housing growth'. This more ambitious housing requirement will facilitate the economic growth required in the county and will be more effective in achieving the Council's vision and objectives.

Response / Recommendation

support welcomed.

Representation(s) | *Nature*

1071 **Cai Parry [822]** | **Support**

Summary:

BDW Homes is supportive of the Council's Preferred Strategic Growth Option, on the basis that it seeks an ambitious but achievable level of growth to support the aspirations of the Strategic Regeneration Plan for Carmarthenshire. Accordingly, BDW Homes considers that the Council's approach is founded upon robust evidence and considers other issues in addition to the latest household projections, in accordance with paragraph 4.2.6 of Planning Policy Wales (Edition 10).

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

2020 **Swallow Investments Limited [3995]** | **Support**

Summary:

Section 9 of the LDP considers a number of alternative Strategic Growth and Spatial Options to support employment growth and the delivery of housing and sustainable development generally. So far as Strategic Growth Options are concerned, paragraphs 9.41 to 9.43 of the LDP confirm a preferred 'Population Growth Long Term Scenario', which is forecast to deliver 9,887 new dwellings (649 new dwellings per annum) and a minimum of 5,295 additional jobs over the LDP period 2018-2033.

My client supports the LDP's preferred Strategic Growth and Spatial Options - they will deliver new housing in line with requirements and new jobs to match the same; and represent an optimistic, though not unrealistic set of assumptions and aspirations, geared towards encouraging housing and economic growth in the County over the LDP period.

Response / Recommendation

Support welcomed.

Paragraph 9.44

Representation(s) | *Nature*

1770 **Savills (Mr Nick Heard) [3216]** | **Comment**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

To deliver the amount of new housing that is required over the Review LDP period six Spatial Options are identified for the distribution of growth.

The Draft Proposed Strategy proposes that Spatial Option 4 which seeks to disperse growth in a way which reflects the role of settlements in relation to their wider catchment is adopted. This would mean that most growth would be focussed in Carmarthen and the surrounding area, the Llanelli Coastal Belt, and the Ammanford and Cross Hands area.

The 2018 Joint Housing Land Availability Study (JHLAS) shows a 3.8 year housing land supply. This represents the fifth consecutive year where a five year supply of housing has not been demonstrated and the continued failure to demonstrate a five year supply since the adoption of the LDP (the Adopted LDP) in 2015. In real terms, this means that in the four years since the adoption of the ALDP 503, 608, 518, and 511 units have been delivered, substantially short of the 1,052 unit a year requirement that the ALDP sets to meet housing need.

There is evidently a delivery problem and The Williams Family suggest that any Spatial Option pursued needs to stand a realistic chance of delivering the required amount of housing. Whilst Spatial Option 4 appears to be a sensible and logical option, The Williams Family suggest that, if Option 6 (Market Led Option) is not to be pursued in its entirety (and the risks associated with such an approach are understood), the spatial strategy must give weight to market conditions and the delivery of houses previously over the Adopted LDP period.

Response / Recommendation

Comments Noted. The Council as part of the LDP process are reviewing all existing housing allocations sites to identify those that are not contributing to the LDP strategy, and a wide ranging assessment is being undertaken to make sure that the most appropriate sites are allocated in the revised Plan. This will be reflected within the apportionment of sites within the each cluster and tier.

Representation(s) | *Nature*

1771 **Savills (Mr Nick Heard) [3216]** | **Comment**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

The number of units built on the allocated sites in St Clears has been considerably higher than in the other Adopted LDP Service Centres, demonstrating that St Clears is an attractive location for growth and is capable of delivering housing and accordingly it is suggested that the Spatial Options reflect this. It also shows that there is only a limited amount of allocated sites left within St Clears and, if a more market-led approach is to be taken, the need for a review of existing and the identification of new allocations is required.

Response / Recommendation

Comments Noted. Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.

Paragraph 9.49

Representation(s) | *Nature*

694 **Lynda James [3039]** | **Support**

Summary:

The proposal is sensible but people will travel some distances to their work place so it is wrong to assume all accommodation should be built in the same location as planned employment opportunities. A percentage of people would prefer to live in a rural area rather than an urban area and be prepared to commute.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Representation(s) | *Nature*

544 **RSAI [3167]** | **Support**

Agent: Lichfields (Mr Arwel Evans) [3166]

Summary:

We agree with paragraph 9.49 of the Preferred Strategy which states that housing development will need to be located in the same broad location as employment opportunities. We also agree that infrastructure improvements need to be aligned with new development if the existing infrastructure is not adequate to accommodate the development.

We consider it is important that the spatial option is determined taking account of the function and role of settlements

Response / Recommendation

Support welcomed.

Paragraph 9.51

Representation(s)		*Nature*
1668	**Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**	**Comment**

Summary:

We note that the Council propose to use the Population Growth Long Term scenario which sets a housing requirement of 9,887 units over the LDP Period.

Option 2 - Infrastructure and Transport Network Options
Available public sewerage and wastewater treatment works (WwTW) capacity is a key element to ensuring sustainable and viable development sites, therefore we welcome the provisions of this spatial option, and are pleased to note that it seeks to encourage growth in areas where there is existing infrastructure capacity or where there are planned improvements.

Response / Recommendation

Comments noted. The availability of infrastructure is a key indicator of deliverability and in the promotion of sustainable development. Key facets of option 2 (notably location of infrastructure) would have fed into the favoured option. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.

Paragraph 9.52

Representation(s)		*Nature*
1639	**Welsh Government (Mr Mark Newey) [13]**	**Comment**

Summary:

Preferred Strategy - The Council has concluded through the Sustainability Appraisal (SA) that a Hybrid Option - 'Balanced Community and Sustainable Growth Strategy' is the most appropriate. This option has been subject to an SA (SA, section 4.5) and is the 'Preferred Strategy'. The Preferred Strategy incorporates the core elements from Options, 2, 4, 5 and 6 which are summarised as follows:
 Growth is assigned to urban areas, while also recognising the role and function of rural settlements
 Reflects investment opportunities and economic benefits afforded to the County through the City Deal.
 Recognised that sustainable growth needs to be supported by the availability and range of infrastructure.
 Growth should also be deliverable and oriented to community need and market demand.
Further clarity is required on the spatial outcome of the Preferred Strategy. The SA highlights that the negative implications of Option 4 are that it could result in a disproportionate amount of development in unsustainable locations, generating significant additional car journeys. In the absence of a LHMA it is also unclear how the Preferred Strategy has been influenced by the level and location of housing need. The Hybrid Option and its spatial distribution requires further justification specifically; how it will deliver affordable housing, employment growth, reduced commuting, relates to the sustainable transport hierarchy (including active travel) infrastructure, minimises air pollution and potential negative impacts on the Welsh Language. These should be considered in light of 'future proofing' and how technology may shape how places function in the future, taking account of digital connections, telecoms, low emission vehicles and the associated benefits on movement patterns.

Response / Recommendation

Noted. See response to representation 1640.

Representation(s) | *Nature*

2430 **Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370]** **Object**

Summary:

The respondent supports Spatial Option 4 - Community Led Option. The respondent notes that they would recommend a strategy based upon concentric circles, namely a village community; a circle of villages; county level; region; Wales, and the strategy would identify the services and proposals which would be suitable for each level within the proposed strategy. The respondent also notes that the Preferred Strategy should reduce the out-migration of young people from the County and specifically state this as an aim of the Plan.

Response / Recommendation

Comments are noted. The Preferred Strategy has been largely influenced by Spatial Option 4, albeit this has been adapted to take account of other influencing factors too. In regard to the proposed approach relating to concentric circles, it is considered that the preferred strategy in fact follows a similar approach in that a settlement hierarchy is set out in Policy SP16: Sustainable Distribution - Settlement Framework which is informed, amongst other factors, by the availability of services and facilities in each settlement or network of settlements.
With regards to reducing the out-migration of young people, this is acknowledged as a key issue under paragraph 6.6. It has also been a key consideration in the evaluation of the options and the selection of the preferred strategy, please see chapters 9 and 10 for an assessment of this. Whilst reducing the out-migration of young people has not been referenced specifically as an aim or objective of the Plan, it is considered that a number of the Plan's objectives would make a significant contributions towards achieving this aim, especially strategic objectives 2, 3, 4, 11 and 12. However, we would welcome ongoing discussions on this matter to determine whether an additional objective should be identified.

Paragraph 9.55

Representation(s) | *Nature*

1685 **Natural Resources Wales (Miss Sharon Luke) [3253]** **Comment**

Summary:

We note your preferred option (Balanced Community and Sustainable Growth Strategy) and support your acknowledgment "that in delivering sustainable growth that it needs to be supported by the availability of a range of appropriate infrastructure". We consider water resources and drainage arrangements such as provision of sewerage infrastructure to be paramount.

Response / Recommendation

Support welcomed. The Council fully agrees that water resources and drainage arrangements such as provision of sewerage infrastructure to be of paramount importance. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.

Representation(s) | *Nature*

814 **Natural Resources Wales (Miss Sharon Luke) [3253]** **Comment**

Summary:

We note your preferred option (Balanced Community and Sustainable Growth Strategy) and support your acknowledgment "that in delivering sustainable growth that it needs to be supported by the availability of a range of appropriate infrastructure". We consider water resources and drainage arrangements such as provision of sewerage infrastructure to be paramount.

Response / Recommendation

Comments noted / support welcomed. The Council fully agrees that water resources and drainage arrangements such as provision of sewerage infrastructure to be of paramount importance.

Representation(s) | *Nature*

1778 **Mr John Morris [3777]** | **Comment**

Agent: LRM Planning (Mr. Michael Rees) [3002]

Summary:

We are supportive of a hybrid option of the various scenarios presented. However, we are of the view that it ought to be more weighted towards the Pre-recession level of growth.
In the first instance we support the approach of ruling out the low growth options (WG 2014 based principal and 10 yr projections, PG Short term and 10 year projections). Such approaches would only reinforce such negative trends identified within the background paper.
We are concerned that the preferred approach should not limit aspirations or growth particularly given the trends that are have been experienced (affordability problems, loss of younger cohorts and trends towards an ageing population). Such an outcome would seem to be contrary to the Welsh Government's Well Being goals, the Placemaking objectives and the aims of the planning system.
Indeed, for this reason we do not believe that the Pre-Recession Growth Projection should be ruled out in its entirety on the basis that it is not achievable. If undeliverable sites are allocated then this will be the case for any of the scenarios.
Whilst our preference is to retain a positive and aspirational intervention that allows flexibility for growth, jobs, mixed communities and prosperity (in line with the vision and objectives of the LDP Review), should the current favoured option be carried forward then we are strongly of the view that it must rely upon a fresh and deliverable supply of homes. Indeed, relying upon existing allocations that have not been brought forward will not achieve the objectives rather it will reinforce the negative trends that have been experienced.

Response / Recommendation

Disagree - The population and household projection scenario identified in the Preferred Strategy considers a long term view for household growth within the county which is reflective of, and takes a balanced view on achieving the housing requirement for the period 2018-2033. Setting a scenario based on the pre-recession level of growth would be considered unsound, as it would be more reflective of the requirements within the adopted LDP, which is currently not being achieved.
The comment relating to existing sites is noted, and the Council as part of the LDP process, are reviewing all existing housing allocations sites to identify those that are not contributing to the LDP strategy, and a wide ranging assessment is being undertaken to make sure that the most appropriate sites are allocated in the revised Plan.

Representation(s) | *Nature*

640 **Simrock Holdings Ltd [3217]** | **Comment**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

SHL does not contest the selection of Option 4 as the most appropriate spatial option but stress that Llangennech performs very well in relation the other Strategic Options that have not been selected. It is included within the Llanelli Growth Area in the ALDP (Option 1 - Current LDP Option), is well located adjacent to the A4138 and within 1km from Junction 48 of the M4 (Option 2 - Infrastructure and Transport Network Option) and has a strategic position in-between Carmarthenshire and Swansea (Option 5 - Swansea Bay City Region Influence Option).

Given that Llangennech performs favorably in connection to a number of unselected Spatial Options, it is considered that this demonstrates it suitability and appropriateness for additional growth

Response / Recommendation

Comments Noted. Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.

Representation(s)

Nature

1585 **The Williams Family . [3585]**

Comment

Agent: Savills (Mr Nick Heard) [3216]

Summary:

There is evidently a delivery problem and and any Spatial Option pursued needs to stand a realistic chance of delivering the required amount of housing. Whilst Spatial Option 4 appears to be a sensible and logical option,it is suggested that, if Option 6 (Market Led Option) is not to be pursued in its entirety, the spatial strategy must give weight to market conditions and the delivery of houses previously over the adopted LDP period.

The number of units built on the allocated sites in St Clears has been considerably higher than in the other ALDP Service Centres, demonstrating that St Clears is an attractive location for growth and is capable of delivering housing and accordingly it is suggested that the Spatial Options reflect this. It also shows that there is only a limited amount of allocated sites left within St Clears and, if a more market-led approach is to be taken, the need for a review of existing and the identification of new allocations is required.

Response / Recommendation

Comments Noted - Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. Consideration will be given to those sites which have failed to deliver in the adopted LDP. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.

Representation(s)

Nature

532 **Mr Owen Williams [3158]**

Object

Summary:

- Using the City-Region Deal as a basis for economic and population growth is risky and unsupported by evidence
- Ignorance of the likely consequences of Brexit on population growth/movement and the housing market and how this may affect competition from other areas
- Failure to prove the plan will deliver (key test of soundness)
- Alternative and more realistic growth forecast required
- Forecasts have been revised downwards by at least one previous Planning Inspector

Change To Plan Sought:

- Revise the population growth forecast used as a basis for the Preferred Option downwards to ensure a more realistic and deliverable plan

Response / Recommendation

The respondents make the assertion that an alternative more deliverable forecast is required. However this is based solely upon a perception that growth will shrink and investment delivery will not take place. Indeed it should be recognised that forecasting a lower growth as suggested would run contrary to the strategic and regeneration objectives both of the Council and the Region. In this respect the LDP must have regard to other Plans and strategies with a failure to do so not only rendering the Plan unsound, but also potentially resulting in these plans and strategies being in conflict with the Development Plan.

The Preferred Strategy is in this regard not only reflective of these plans and strategies and government backed investments but is as a result based on evidence around projected growth. The omission of the growth projected from investments such as the City Deal would in themselves not be evidence based as they would omit known potential for growth.

The potential implications from changes in circumstance will be monitored as the Plan progresses through its preparatory process. It should also be noted that the Deposit LDP will include a monitoring framework which will measure the success or otherwise of the LDP in delivering its policies and proposals.

The LDP will be subject to further evidence as part of the preparation of the Deposit Plan.

Representation(s)		*Nature*
1073	**Cai Parry [822]**	**Object**

Summary:

Contradiction between Preferred Option and Planning Policy Wales (Edition 10) in that it seeks to direct development to smaller settlements, which are less sustainable and would increase reliance upon the private car.

The Preferred Option should be amended to confirm that new development will be apportioned in accordance with the role of each settlement (i.e. higher proportions within the 'Principal Centres' and lower proportions within the 'Sustainable Villages' and 'Rural Villages').

Change To Plan Sought:

The Preferred Option should be amended to confirm that new development will be apportioned in accordance with the role of each settlement (i.e. higher proportions within the 'Principal Centres' and lower proportions within the 'Sustainable Villages' and 'Rural Villages').

Response / Recommendation

Comments Noted. The Council considers that the indicative apportionment of residential growth by tier is based on a sound and reasonable assessment, by identifying a number of factors which influence it. However, the indicative apportionment affords an allowance in to be made; the level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.

Representation(s)		*Nature*
10	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

In considering your strategic growth and spatial options it is reassuring to see that you had consideration to a number of key Economic Development policy documents including the Council's Strategic Regeneration Plan 2015 - 2030 - Transformations and the Swansea Bay City Deal. These documents form the basis for our activity in Economic Development and the fact they are referenced throughout the consultation document provides a confidence that the plan that is emerging through the LDP process will be strategically aligned to that of the work of Economic Development. The preferred option of "Balanced Community and Sustainable Growth Strategy" is seen as a positive option in that this hybrid option retains an approach which will seek to be responsive in how it assigns growth, to urban and rural areas. The option also looks to:
* Recognise and reflect investment and economic benefits to the County and its communities through the City Deal, and other economic opportunities,
* It will seek to provide opportunities for rural areas ensuring the diversity of the County and communities is recognised;
* It will acknowledge that in delivering sustainable growth that it needs to be supported by the availability of a range of appropriate infrastructure;
* It will recognise that growth should be deliverable and orientated to a community's needs and market demand.
These points are welcomed as they are supportive of potential investment and growth in the county. I believe this approach is essential to ensure that any private sector interest in the county has a planning framework that is supportive subject to the development being proportionate and relevant to the respective settlement.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
696	**Lynda James [3039]**	**Support**

Summary:

Seems the most balanced approach for sustaining and building the economy whilst retaining the sustainability of rural areas and the role they play in tourism.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Representation(s) | *Nature*

543 **RSAI [3167]** | **Support**

Agent: Lichfields (Mr Arwel Evans) [3166]

Summary:

Support the use of the hybrid option but note that there is a need to take into account the market and whether the locations identified will be deliverable. The Swansea Bay City Region is also important and it is not appropriate to ignore the fact that some areas of Carmarthenshire are in close proximity to Swansea and the employment opportunities that the City provides.

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

2021 **Swallow Investments Limited [3995]** | **Support**

Summary:

Regarding Spatial Options, paragraph 9.55 of the LDP confirms a preferred 'Balanced Community and Sustainable Growth Strategy', reflecting the role and function of the County's settlements in directing growth to the most sustainable locations, whilst recognising the need to deliver opportunities in the County's rural areas.

My client supports the LDP's preferred Strategic Growth and Spatial Options - they will deliver new housing in line with requirements and new jobs to match the same; and represent an optimistic, though not unrealistic set of assumptions and aspirations, geared towards encouraging housing and economic growth in the County over the LDP period.

Response / Recommendation

Support welcomed.

Section 10. A New Strategy

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Representation(s)		*Nature*
1636	**Welsh Government (Mr Mark Newey) [13]**	**Comment**

Summary:

Growth Levels: Homes & Jobs
The authority has explored six population based growth scenarios and two employment-led scenarios. The authority has concluded the WG-2014 based projections would result in low levels of housing growth impacting negatively on demographic change (population decline) and ability to support economic growth. The 2014-based Principal and 10 year migration variant projections would result in a dwelling requirement of 3,367 and 6,542 respectively. The Council's preferred growth option is 'PG Long Term' which is predicated on significant internal and international migration flow assumptions averaging 1,423 persons pa for the sixteen year period 2001/02-2016/17. This period takes into account the high migration levels prior to 2008, and lower net migration following the recession. This is particularly relevant in this context as deaths exceed births; net migration being the dominant driver of population change. The PG Long Term Scenario results in a dwelling requirement of 9,887 dwellings (659 p/a) over the plan period. This is based on a 3.4% vacancy rate (VR) (adjusted from 6.3% Census VR) which takes into account recent data on second and empty homes. This is a deviation of 6,520 dwellings above the WG-2014 based principal projection and 3,345 dwellings above the 10-year migration variant. The proposed housing requirement of 9,887 is a substantial reduction of 5,310 dwellings from a requirement of 15,197 homes in the current adopted plan.
The evidence also explains that the jobs led scenario(s) tested would result in a requirement for 17,000 - 20,000 homes over the plan period. The Council has stated that this would result in an undeliverable and unsustainable growth strategy. Recent housing completions based on 10 year average JHLAs figures are approximately 500 d/pa. In summary, the Council has chosen a demographic led scenario that will contribute to the delivery of the Council's economic aspirations. The population increase targeted by the PG Long Term Scenario would result in supporting the creation of 5,295 jobs (353 p/a) over the plan period. The authority must fully justify/evidence that the growth levels are directed to the most sustainable places, related to the scale and location of housing need, not impacting negatively on the Welsh language and is realistic and deliverable. You should also demonstrate the growth strategy is compatible with the aspirations of neighbouring authorities and provides the most sustainable locations for growth for the wider area. See comments on spatial strategy.

Response / Recommendation

Noted. The scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP including its distribution.
Matters in relation to the Welsh language will be considered as part of the LDP's evidence base and within the Sustainability Appraisal. See representation 1647.

Section 10. A New Strategy

Representation(s) — *Nature*

1640 **Welsh Government (Mr Mark Newey) [13]** — **Comment**

Summary:

Preferred Strategy - The Council has concluded through the Sustainability Appraisal (SA) that a Hybrid Option - 'Balanced Community and Sustainable Growth Strategy' is the most appropriate. This option has been subject to an SA (SA, section 4.5) and is the 'Preferred Strategy'. The Preferred Strategy incorporates the core elements from Options, 2, 4, 5 and 6 which are summarised as follows:

- Growth is assigned to urban areas, while also recognising the role and function of rural settlements
- Reflects investment opportunities and economic benefits afforded to the County through the City Deal.
- Recognised that sustainable growth needs to be supported by the availability and range of infrastructure.
- Growth should also be deliverable and oriented to community need and market demand.

Further clarity is required on the spatial outcome of the Preferred Strategy. The SA highlights that the negative implications of Option 4 are that it could result in a disproportionate amount of development in unsustainable locations, generating significant additional car journeys. In the absence of a LHMA it is also unclear how the Preferred Strategy has been influenced by the level and location of housing need. The Hybrid Option and its spatial distribution requires further justification specifically; how it will deliver affordable housing, employment growth, reduced commuting, relates to the sustainable transport hierarchy (including active travel) infrastructure, minimises air pollution and potential negative impacts on the Welsh Language. These should be considered in light of 'future proofing' and how technology may shape how places function in the future, taking account of digital connections, telecoms, low emission vehicles and the associated benefits on movement patterns.

Response / Recommendation

Noted. The scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP - including the proportions allocated to the respective tiers within the hierarchy. Further details in respect of the implications of option 4 will be further considered as the detail associated with the preparation of the Deposit LDP emerges.

The Council recognises the importance, and role, of an up to date Local Housing Market Assessment (LHMA) and is currently working with authorities across the region to prepare an up to date LHMA. The LHMA will inform the preparation of the Deposit LDP.

Section 10. A New Strategy

Representation(s) — *Nature*

1646 **Welsh Government (Mr Mark Newey) [13]** — **Comment**

Summary:

The delivery of the strategy is reliant upon the authority allocating sites which are broadly viable, deliverable and in accordance with the settlement strategy. The Draft Manual (Ed 3) Chapter 5: Preparing an LDP (Core Issues) sets out the key issues that must be addressed. The Council should ensure that the Deposit Plan has covered all relevant elements, with particular attention to the de-risking checklist.
To demonstrate delivery and implementation, the Deposit plan must be underpinned by viability work, an infrastructure plan and include a robust housing trajectory (included as an Annex within the plan) and a housing land supply table.
With the exception of the two strategic sites, the plan is completely silent on the allocations (housing or employment) required to deliver the strategy. There is no indication or analysis of 'key' candidate sites, nor of the existing allocations and their relevance or future status going forward. There is no assessment in broad terms of the current land bank, windfall and small sites that may come forward. Allocated sites should only be 'rolled forward' in exceptional circumstances where there is clear and robust evidence that they can be delivered. Site specific viability work, including detailed articulation of timing and phasing, costs, and infrastructure requirements including the preparation of Statements of Common Ground will be necessary to demonstrate the delivery of the plan.
The Preferred Strategy identifies two strategic sites (Policy SP5); Yr Egin Creative Cluster in Carmarthen and the Llanelli Well-being and Life Sciences project which are both components of the Swansea Bay City deal. The Deposit plan must demonstrate deliverability of both individual sites and in combination, together with Statement of Common Ground with developers. The Deposit Plan should set out site specific details for key allocations including schematic frameworks containing information on viability, general phasing timescales, key infrastructure requirements and evidence of commitment from developers.
A key issue highlighted in the Councils evidence base (Spatial Options Topic Paper, para 8.9) is that completions/sites did not come forward as anticipated in the more sustainable settlement tiers which suggests that completions have been occurring in the least sustainable areas. This has been a major shortcoming of the existing plan that should not be replicated in the revised LDP.
Finally, the Council is proposing a flexibility allowance of 6% (593 units) to be added to the housing requirement. Further evidence is required as to why 6% is appropriate, and how it relates to all housing components and their delivery and phasing over the plan. A 6% figure appears low in the context of the Welsh Average (10%) and the more rural nature / developer profile prevalent within Carmarthenshire.

Response / Recommendation

Noted. The Council is aware of the need for the Plan to contain viable and deliverable sites and matters relation to their suitability and identification will be considered as part of the preparation of the Deposit LDP. Attention is drawn to the Candidate Site process, and whilst the respondent's points are noted the submission of 926 candidate sites is a figure beyond that generally anticipated and in itself presents notable challenges in terms of analysis. However, an initial assessment of Candidate Sites has been undertaken and is available on the Council's website. This will be further developed as the preparation of the Plan progresses and as the sites are assessed.
The need for clarity in respect of the current landbank, windfall, small sites and future deliverable allocations is recognised and will be considered as part of the preparation of the Deposit LDP.
Further evidence in respect of the flexibility allowance will be provided as part of the preparation of the Deposit LDP.
The reference to the requirements of the Local Development Manual Edition 3 is noted and will be appropriately considered as part of the preparation of the Deposit Plan. However, it should be noted that Edition 3 of the Manual at the time of writing is pending publication and as such could not be considered in the preparation of the Preferred Strategy.

Section 10. A New Strategy

Representation(s)		*Nature*
2421	**Dyfodol (J W Thomas) [563]**	**Object**

Summary:

The Respondent raises concerns regarding the economic information and theories which underpin the level of housing need identified. The comments make particular reference to the current economic situation and potential weaknesses.

Response / Recommendation

Comments noted. Further evidence will be produced to inform the economic needs of the County and its impacts upon the County's housing needs.

Representation(s)		*Nature*
2422	**Dyfodol (J W Thomas) [563]**	**Object**

Summary:

The respondent raises concerns over the level of housing growth identified in the Preferred Strategy and considers that this level of housing is not needed. The respondent notes that there is insufficient information in the Preferred Strategy to evidence the level of proposed housing growth. The respondent also notes a preference for the LDP to focus on job creation and infrastructure rather than housing growth.
Furthermore, the respondent considers that there is insufficient information to assess the impacts of housing growth upon the Welsh language.

Response / Recommendation

Comments are noted. There is information regarding the identification of housing growth levels in the supporting evidence. The LDP aims to enable and facilitate job creation in the County and emphasises the need for suitable infrastructure to support development. The Council considers that a rational approach which supports both housing, infrastructure and job creation can be achieved through this strategy and considers that these 3 elements are not mutually exclusive but rather are all key considerations of the preferred strategy.
The SA/SEA assessed the anticipated impacts of the Preferred Strategy upon the Welsh language and the Deposit Revised Local Development Plan will be informed by a Welsh Impact Assessment.

Representation(s)		*Nature*
1748	**City & County of Swansea (Mr Tom Evans) [3761]**	**Support**

Summary:

Swansea Council are broadly supportive of the vision, objectives and chosen growth and spatial strategy of the Preferred Strategy

Response / Recommendation

Support welcomed.

Section 10. A New Strategy

Representation(s)		*Nature*
1673	**Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**	**Support**

Summary:

The strategy is similar in approach to the Pembrokeshire Coast National Park LDP with growth focused in the higher tiers.

The attached table shows the compatibility of approach in both Plans.

Exceptional land release for affordable housing: include the option of releases higher up in the hierarchy to help meet need.

Affordable Housing Contributions: clarify if contributions will be required for sites below the threshold for provision on site.

Employment: It will be helpful to see the approach to be taken to employment on edge of settlement/in the countryside.

Viability: Viability when providing affordable housing may influence the 5 or more threshold.

Response / Recommendation

Support Welcomed. The Council will continue to update its evidence base leading into the Deposit LDP and address some of the highlighted comments. Further clarification will be given to viability and affordable housing once key pieces of evidence are completed which will inform the policy content of the Deposit LDP

Representation(s)		*Nature*
1674	**Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**	**Support**

Summary:

Support the general conformity of approach.
The Spatial Strategy commentary above sets out where there is consistency of approach on where employment undertakings can take place in the County along with notes of clarification.

The employment and economic development strategy of Carmarthenshire County Council's Preferred Strategy focusses on the Swansea Bay City Deal and looks to the local authorities east of Carmarthenshire. There is also the possibility of a Regional Strategic Economic study (which both Authorities are party to) being produced which will assist in the development of the Deposit Local Development Plan.

Response / Recommendation

Support Welcomed. The Council will continue to update its evidence base leading into the Deposit LDP and address some of the highlighted comments.

Paragraph 10.1

Representation(s)		*Nature*
1632	**Miss Rhiannon Mathias [3656]**	**Object**

Summary:

No more homes should be built except where those for the need of local people. More staff should be within the planning department because a planning application I have interest in was submitted over 7 months ago and no response received.

Change To Plan Sought:

No more homes should be built except where those for the need of local people.

Response / Recommendation

Disagree. The Plan seeks to provide a balanced level of housing growth to meet the needs of the County and its communities. A key element of such balance is the provision of, and allowance for, affordable housing and recognising local need.

Representation(s)		*Nature*
7	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

Overall the Division welcomes the approach of the Pre - Deposit Local Development Plan and its broad strategic principles which it has set out as its preferred strategy for Carmarthenshire up to 2033. We support the principle that the plan is built on sustainability, and the objectives contained within the Carmarthenshire Well-being Plan

Response / Recommendation

Support welcomed.

Paragraph 10.3

Representation(s)		*Nature*
8	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

It is positive to see that that the plan recognises the spatial differences across the county. Recognition that a one size policy solution doesn't fit all, and that policies will need to reflect different circumstances depending upon their area is welcomed.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
11	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

The new strategy recognises the diverse nature of the county and the settlement hierarchy and six clusters reflects the function, role and diversity that exists within and between the differing areas of the county. The recognition of the strategic growth areas of Llanelli, Ammanford/ Cross Hands, and Carmarthen is supported and their continued growth is key for prosperity for the county. It is good to see a balance with the other areas of the county most notably the rural market towns highlighted for local growth and diversification with growth reflecting their community needs and aspirations. The "allocation of sites and the use of policies will provide a framework for the provision of employment and job creation opportunities", coupled with statements such as "seek to provide a positive approach to help these areas meet their full potential" is fully supported. This together with mention of "a responsive policy approach" in the context of addressing county variations is most welcomed and offers a platform for a planning framework which can meet the needs of future growth aspirations that this Division sees for the county.

Response / Recommendation

Support welcomed.

Paragraph 10.5

Representation(s)		*Nature*
1459	**Cllrs Price & Vaughan-Owen [3546]**	**Comment**

Summary:

Over the past decade, the Gorslas ward, along with many other areas within the Ammanford/Cross Hands growth area, has seen significant housing development, which have had an impact on villages within the Ward. We are keen to ensure that any sites that progress from this stage, meet the local need for housing and for business. It is vital that any developments will not have a negative impact on education establishments, community facilities, health centres and the local environment.

Response / Recommendation

Comments noted. The Plan will be based on a robust evidence base which provides clarification on the matters listed within the representation. The Site Assessment Methodology will allow for the consideration of housing sites to be based on a robust and consistent approach. The Sustainability Appraisal will have a key role in assessing the Plan's sustainability credentials.

Deliverable Growth

Representation(s)		*Nature*
2425	**Dyfodol (J W Thomas) [563]**	**Comment**

Summary:

The Respondent states a number of facts in respect of the Plan's provision for new homes.

Response / Recommendation

Comments noted. The Plan and its provision for homes is supported by robust evidence and is been informed by consultation - not least the Key Stakeholder Forum - as well as other plans and strategies.

Paragraph 10.12

Representation(s)		*Nature*
1469	**Cllrs Price & Vaughan-Owen [3546]**	**Comment**

Summary:

A robust evidence base is necessary to ensure developments reflect the genuine need for local housing, including the correct mix of affordable housing, Social housing, family homes and housing suitable for an ageing population.

Any housing sites should be size appropriate and not constitute over development within villages. Sites progressing from this stage, should consider the effect on current housing sites and be sensitive to negatively impacting local residents.

Response / Recommendation

Comments noted. The Plan will be based on a robust evidence base which provides clarification on the matters listed within the representation. The Site Assessment Methodology will allow for the consideration of housing sites to be based on a robust and consistent approach. The Sustainability Appraisal will have a key role in assessing the Plan's sustainability credentials.

Paragraph 10.18

Representation(s)		*Nature*
1686	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We welcome the inclusion of Section 10.18 which notes that the LDP seeks to put a policy framework in place which tackles the causes and effects of climate change within the communities through the adoption of sustainable principles and development.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
815	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We welcome the inclusion of Section 10.18 which notes that the LDP seeks to put a policy framework in place which tackles the causes and effects of climate change within the communities through the adoption of sustainable principles and development.

Response / Recommendation

Support welcomed

Paragraph 10.19

Representation(s)		*Nature*
267	**RWE Innogy UK Ltd (Miss Eleri Davies) [471]**	**Object**

Summary:

Under the heading entitled 'Sustainable Development, Well-being and Climate Change' in 'A New Strategy' (Section 10) there is no reference to renewable energy.

Change To Plan Sought:

As well as "minimising energy demand and consumption", this section should include reference to the critical role that "renewable energy" also plays in the context of 'Sustainable Development, Well-being and Climate Change' in 'A New Strategy' (Section 10).

Response / Recommendation

Agree, add reference to renewable energy in the second bullet point of paragraph 10.19.

Representation(s)		*Nature*
1687	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We support the principles of sustainability, noted in Section 10.19, that the LDP will promote.

Response / Recommendation

Support welcomed

Representation(s)		*Nature*
816	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We support the principles of sustainability, noted in Section 10.19, that the LDP will promote.

Response / Recommendation

Support welcomed

Representation(s)		*Nature*
1654	**Simon Chaffe [855]**	**Support**

Summary:

Para 10.19, bullet 2 - SUPPORT
'including the promotion of the efficient use of resources including directing development to previously developed land wherever possible;'

Response / Recommendation

Support welcomed.

Paragraph 10.20

Representation(s)		*Nature*
1462	**Cllrs Price & Vaughan-Owen [3546]**	**Comment**

Summary:

It is vital that all future development ensure the distinctiveness and character of our villages and impacts positively on the Welsh language and culture.

To ensure communities remain vibrant, it is important, that any developments are supported by the necessary public transport infrastructure so that our villages do not develop as commuting settlements.

We welcome the "Balanced Community and Sustainable Growth Strategy". We would very much like to see the sustainable distribution of growth throughout the county, which includes the rural communities of Carmarthenshire

Response / Recommendation

Comments noted / support welcomed. The Balanced Community and Sustainable Growth Strategy seeks to provide a platform for the delivery of the Plan's Vision and Strategic Objectives, which include a recognition of the important role of rural areas. The Sustainability Appraisal will have a key role in assessing the Plan's sustainability credentials - not least the availability of public transport.

Representation(s)		*Nature*
268	**RWE Innogy UK Ltd (Miss Eleri Davies) [471]**	**Object**

Summary:

The 'key components' of the 'New Strategy' fails to mention renewable energy, a critical component in the context of 'Sustainable Development, Well-being and Climate Change'.

Change To Plan Sought:

Include 'renewable energy' in the 'key components' of the 'New Strategy'.

Response / Recommendation

Agree. Include reference to Renewable Energy within paragraph 10.20 as follows:
'To make appropriate provision for renewable energy within the County'

Representation(s)		*Nature*
12	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

The LDP growth plan based upon the delivery of 9,887 homes over the plan period seems rational and achievable, whilst the delivery of 5,295 jobs over the plan period is consistent with the aspirations of the Council's Strategic Regeneration Plan 2015 - 2030 - Transformations, which has a target of 5,000 jobs by the end of 2030, and again seems realistic and deliverable over the plan period. Overall the economic development elements of the key components of the new strategy are welcomed.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1655	**Simon Chaffe [855]**	**Support**

Summary:

Para 10.20, bullet 13 - SUPPORT
'Recognise the contribution of 'previously developed land' and utilises it as appropriate whilst recognising the County's largely rural context;'

Response / Recommendation

Support welcomed.

Figure 4: Key Diagram

Representation(s)		*Nature*
1753	**City & County of Swansea (Mr Tom Evans) [3761]**	**Comment**

Summary:

Preferred Strategy Key Diagram: - We suggest that the key diagram could helpfully be amended to clearly show the hierarchy of the road network and M4 junctions in order to aid understanding of the relationship between the road network and key settlements & site allocations. The legend could also be clarified to show the names of each of the clusters, and to identify neighbouring local authorities.

Response / Recommendation

Comments noted and proposed changes agreed in part. The Key diagram of the Preferred Strategy seeks to provide an overview of the County at a strategic level. The policies and provisions of the Deposit LDP will provide detail with regards to the hierarchy of the road network and M4 junctions in order to aid understanding of the relationship between the road network and key settlements & site allocations. It is agreed that the legend of the Key diagram should be clarified to show the names of each of the clusters, and to identify neighbouring local authorities - and this will be done as part of the preparation of the deposit LDP.

Section 11. Strategic Policies

Paragraph 11.6

Representation(s)		*Nature*
817	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

We welcome the acknowledgment within Section 11.6 to work closely with partners, infrastructure providers, developers etc. in delivering the plan.

Response / Recommendation

Comments noted / support welcomed. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.

Strategic Policy - SP1

Representation(s)		*Nature*
1644	**Welsh Government (Mr Mark Newey) [13]**	**Comment**

Summary:

Policy SP1 supports the delivery of approximately 5,300 jobs, further evidence and explanation is required to explain how and where the level of job growth will be delivered, including both strategic and non strategic allocations. It is unclear what the level of employment provision is and for what sector and how this translates into a land requirement for employment uses. The current employment evidence base is inconsistent and unclear. The plan is currently silent on the type and location of key employment sites required to deliver the strategy. Further explanation is also required on how all opportunities arising from the Swansea Bay City Region have been taken into account as part of the economic strategy.
The Deposit Plan should:
 provide greater articulation on the link between the plan's housing requirement and target for 5,300 jobs to ensure broad alignment in economic activity and labour force projections and reduce the need for commuting;
 identify an employment (ha) / job target and buffer;
 identify spatial allocations to meet identified need including broad timing and phasing and defining the land use by Use Class;
 if appropriate, include a new policy to protect and identify key employment sites to safeguard for future employment use;
 include a policy to support alternative uses on existing employment sites not safeguarded;
 explain how allocated sites will be delivered, especially key allocations; and policies to promote and sustain the rural economy.

Response / Recommendation

See response to representation 1645.

Representation(s) — *Nature*

1783 **Mr John Morris [3777]** — **Object**

Agent: LRM Planning (Mr. Michael Rees) [3002]

Summary:

It is clearly a major requirement of PPW10 that great importance is placed upon the provision of homes, indeed, sustainable places cannot be facilitated without adequate provision. In this regard, PPW 10 recognizes the importance of a home to people's lives and indicates that Authorities must:
* identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;
* enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and
* focus on the delivery of the identified housing requirement and the related land supply.
Accordingly, it is important that an appropriate supply of homes is identified. As noted above, we are concerned that the revised requirement will not address key issues raised nor achieve the overarching aims of the Plan or its objectives. It is our view that it should be more aspirational and the hybrid option should lean towards higher job growth and economic development.
Notwithstanding our views on the level growth sought, it is clearly the case that based on the favoured option and given the issues identified within the LDP there are two key considerations that are inter related:
1. Flexibility allowance: The current level of flexibility (3.7%) was plainly insufficient, a greater level could have resulted in supply problems being addressed at an earlier stage.
Indeed, other Authorities have tended to lie between 10% to 20%, accordingly we are of the view that at least 15% should be used. This would reflect the fact that a number of the large strategic sites suffer from significant environmental & physical constraints and may not be brought forward.
A flexibility allowance of 15% would result in a need to identify at a supply pool of at least 11,370 dwellings that would be available and deliverable.
2. Delivery: Given the shortfall in supply it will be problematic to simply roll the existing supply pool forward to suit a lower housing requirement. Indeed, whilst this might prima facie provide a 5 year supply, it will not address the core issues nor meet the requirements of PPW (in terms of placemaking) and implement the aspirations. It will simply mean that the existing trends are carried forward. There are over 4000 dwellings in category 4 of the JHLAS, this is a considerable number that have failed to deliver within the LDP timeframe to 2021. It is strongly our view that a considerable number of these ought not be carried forward in a review.We await the findings of the review of these sites in terms of viability and delivery. We would accept that if a large number of these sites were replaced with new allocations then our concerns over flexibility may be alleviated.

Response / Recommendation

Comments Noted - The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP. The comment relating to existing sites is also noted, and the need for clarity in respect of the current allocated sites is recognised and will be considered as part of the preparation of the Deposit LDP.

Representation(s) — *Nature*

549 **RSAI [3167]** — **Object**

Agent: Lichfields (Mr Arwel Evans) [3166]

Summary:

Question whether using past build out rates is appropriate given depressed housebuilding over last 10 years.

Change To Plan Sought:

Question the basis of using past build rates to inform the housing requirement and consider that a more aspirational outlook should be utilised which would in turn support a higher level of employment growth.

Response / Recommendation

Disagree - The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow. The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.

Representation(s)		*Nature*
2101	**Union Tavern Estate [3913]**	**Object**

Agent: Barton Willmore (Joe Ayoubkhani) [646]

Summary:

In summary, SP 1: Strategic Growth is objected to and a housing requirement in line with the existing adopted LDP should be utilised, owing to:
a) Planning policy dictates that the Welsh Government projections should form only one element of the 'key evidence' in respect of assessing housing requirements, and that there are a number of specific contextual, policy and economic considerations which need to be accounted for in the context of Carmarthenshire;
b) Stepping down from the current LDP level would represent a serious risk of triggering enhanced issues of affordability, which already comprises a significant pressure to the local population;
c) Growth at current levels is required to support the construction sector (which is one of the greatest employers in Carmarthenshire); however, the current LDP does not account for the Swansea Bay City Deal. Significant housing growth (over and above current levels targeted) will be required to underpin the circa 10,000 new jobs targeted to be created within the region, a significant number of which will need to be accommodated and housed within Carmarthenshire due to the commitment for investment in the Council area.

Response / Recommendation

Disagree. The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it. Reference is made to the review report for the adopted LDP, and the Annual Monitoring Reports in relation to their findings on the deliverability of the current growth as advocated by the respondent.

Representation(s)		*Nature*
13	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

SP1 - Strategic Growth specifically refers that "The LDP will provide for the future growth of the economy and housing requirement..." and that "the strategy builds on the corporate emphasis on regeneration and the opportunities presented through the city deal....." is fully supported by the Division.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1689	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We welcome the acknowledgment within Section 11.6 to work closely with partners, infrastructure providers, developers etc in delivering the plan.

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

2022 **Swallow Investments Limited [3995]** | **Support**

Summary:

Strategic Policy SP1 reflects the LDP's preferred Strategic Growth and Spatial Options, by confirming provision of 10,480 new homes to meet a requirement of 9,887 new dwellings over the LDP period; and provision of a minimum 5,295 new jobs to provide for economic growth over the LDP period. The Policy confirms that development will be distributed in a sustainable manner, consistent with the LDP's Spatial Strategy and Settlement Hierarchy.

My client supports Strategic Policy SP1 - it sets the context for delivering new housing in line with requirements and sets the conditions to match new jobs with the same; and represents a sustainable and optimistic, though not unrealistic strategy geared towards encouraging housing and economic growth in the County over the LDP period.

Response / Recommendation

Support welcomed.

Strategic Policy - SP2

Representation(s) | *Nature*

1754 **City & County of Swansea (Mr Tom Evans) [3761]** | **Comment**

Summary:

Strategic Policy SP 2: Retail and Town Centres -We suggest that it would be useful for both Councils to work together to consider the impact of Carmarthenshire's retail strategy on Swansea, both in terms of impact on Swansea's highway network and retail hierarchy (particularly Swansea City Centre's role as a regional centre). We suggest that the retail strategy set out in the Swansea LDP should be considered together with the Swansea Central Area Regeneration Framework.

Response / Recommendation

Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. The Council recognises the value of the retail industry within the region and the county and will also seek to ensure that we understand the impact of proposals in neighbouring authorities will have on Carmarthenshire's Retail provisions.

Representation(s)		*Nature*
1621	**Kames Capital UK Active Value Property Unit Trust [3610]**	**Comment**

Agent: ROK Planning (Mr Alun Evans) [3609]

Summary:

The representations seek to demonstrate the background position regarding the specific retail centre and provide a response to (a) the proposed retail policy drafting and (b) the proposed Candidate Site allocation.
A conclusion is then provided which identifies minor alterations to the proposed draft retail policy, in order that the Cambrian Way shopping centre retail offer can be optimised and secured and suggest a more flexible local plan designation for the retail centre, including intensification of the use of the floorspace at upper levels.
The respondent suggests the following amendment to para 11.27:
"We recognise that the role of town centres and traditional retail patterns is changing, as such both town centre and primary and secondary retail boundaries as identified previously will be reviewed and where appropriate revised. This recognition of the changing retail pattern and the potential for flexibility in maintaining occupancy and footfall, as part of the creation of vibrant and living environments."
The respondent advocates the removal of the Primary and Secondary retail designations. Proposes the inclusion of the following at the end of the second paragraph of SP2:
Within the Principal Centres, a majority of retail units should comprise A1 Retail Use, with other commercial and Town Centre Uses making up the balance of units. It is not considered appropriate to identify Primary and Secondary retail frontage in order to encourage diversity and maintain the overall economic function of the Principal Centres.

Response / Recommendation

Disagree. It is considered the policy and the supporting text makes appropriate provision for the strategic consideration of retail centres across Carmarthenshire. In this regard it should be recognised that individual centres have intrinsic characteristics and potential challenges. With this in mind the suggested changes would be prescriptive across all centres and would limit the opportunity for more detailed policies to respond specifically to the needs of a given centre.

Representation(s)		*Nature*
1768	**Columbia Threadneedle Investments (To whom it may concern) [3771]**	**Comment**

Summary:

The respondent strongly support the principle of seeking to support the deliver of new retail leisure, office, cultural facilities within defined centres. Such uses considered appropriate in shopping areas where these serve to maintain a healthy and vibrant town centre. The merging Local Plan should seek to promote a relaxation of the current adopted policy in order t provide a range of more diverse uses within town centres within Carmarthenshire.

Accordingly, emerging detailed policies should not be overly prescriptive in terms of setting a specific percentage of number of contiguous non-A1 uses that are permissible. Rather it should look to place the onus on the applicant to demonstrate how a non-A1 use would secure the vitality and viability of the defined retail frontages and wider town centre.

Policy should specifically include consideration of the re-use of upper floors for appropriate non-A1 uses and the introduction of flexibility for temporary or meanwhile use of vacant properties within the town centre.

Response / Recommendation

Comments Noted - Detailed consideration of the points noted by the respondent will be subject to further consideration as part of the policies and provisions of the Deposit LDP. These are not matters considered appropriate from a strategic policy context.

Representation(s) | *Nature*

14 **Carmarthenshire County Council (Mr Stuart Walters) [2345]** **Support**

Summary:

SP2 - Retail and Town Centres - we support the principles laid out in this policy and recognise the general pattern of provision in a traditional hierarchy of centres and the ole of out of town centres. We also support the policy in that town centres need to be able to adapt to the changing nature of retailing. As a division we have many interventions and programmes that are currently in place which aims to strengthen the town centre roles and this alignment is welcomed.

Response / Recommendation

Support welcomed

Representation(s) | *Nature*

1698 **Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]** **Support**

Summary:

Support SP 2 Retail and Town Centres
Both Authorities' strategies focus on the need to maintain / create vibrant and diverse town, district and local centres. Retail provision in both Authorities is identified through the retail hierarchy with Carmarthenshire's hierarchy being based on Principal Centres, Service Centres and Local Provision Centres.

Response / Recommendation

Support Welcomed

Strategic Policy - SP3

Representation(s) | *Nature*

1675 **Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]** **Comment**

Summary:

Housing Growth - Pembrokeshire Coast National Park Authority has no comment on the anticipated scale of growth proposed.

Response / Recommendation

Comment Noted

Representation(s) | *Nature*

636 **Comment**

WYG PLANNING & ENVIRONMENT (Louise Darch) [598]

Summary:

A key source in meeting the identified housing land requirement is through sites allocated for residential development within the LDP. We note these housing allocations will be identified within the specific housing policies, or included as part of mixed use allocations.

We note and welcome land adjacent to B4317 Culla Rd (candidate site ref CA0514) and land adjacent to B4317 Culla Rd roundabout (candidate site ref: CA0515) being taken forward for further detailed assessment. As set out in the respective candidate site submissions both sites are sustainably located and immediately deliverable. Both sites should be allocated for housing pursuant to Strategic Policy 3; both sites will make a valuable contribution towards meeting Carmarthenshire's future housing needs.

Response / Recommendation

Noted. The site specific matters highlighted by the respondent are not subject to consideration within this Draft Preferred Strategy.

Representation(s)		*Nature*
1586	**The Williams Family . [3585]**	**Comment**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

Wholly inadequate flexibility given the undersupply in the adopted LDP and there is a need for a buffer of a very minimum of 10% to ensure delivery.

Thorough review of sites that are allocated in the adopted LDP to consider their suitability for their continued allocation in the revised LDP.

Whilst it is understood that CCC may have aspirations for sites in St Clears to be developed there must be genuine concerns about their viability and deliverability -

Accordingly, it is suggested that they are not continued as allocations within the RLDP on the basis that deliverability has not been demonstrated.

Response / Recommendation

Comments Noted. The Council as part of the LDP process are reviewing all existing housing allocations sites to identify those that are not contributing to the LDP strategy, and a wide ranging assessment is being undertaken to make sure that the most appropriate sites are allocated in the revised Plan. This will be reflected within the apportionment of sites within the each cluster and tier.

Representation(s)		*Nature*
642	**Simrock Holdings Ltd [3217]**	**Comment**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

Whilst the increased buffer that is proposed in the revised LDP is marginally greater than in the adopted LDP, it is suggested that it is still wholly inadequate given the undersupply in the adopted LDP and there is a need for a buffer of a very minimum of 10% to ensure delivery.

Response / Recommendation

Comments Noted - The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.

Representation(s)

Nature

1785 **Mr John Morris [3777]**

Object

Agent: LRM Planning (Mr. Michael Rees) [3002]

Summary:

It is clearly a major requirement of PPW10 that great importance is placed upon the provision of homes, indeed, sustainable places cannot be facilitated without adequate provision. In this regard, PPW 10 recognizes the importance of a home to people's lives and indicates that Authorities must:
* identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;
* enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and
* focus on the delivery of the identified housing requirement and the related land supply.
Accordingly, it is important that an appropriate supply of homes is identified. As noted above, we are concerned that the revised requirement will not address key issues raised nor achieve the overarching aims of the Plan or its objectives. It is our view that it should be more aspirational and the hybrid option should lean towards higher job growth and economic development.
Notwithstanding our views on the level growth sought, it is clearly the case that based on the favoured option and given the issues identified within the LDP there are two key considerations that are inter related:
1. Flexibility allowance: The current level of flexibility (3.7%) was plainly insufficient, a greater level could have resulted in supply problems being addressed at an earlier stage.
Indeed, other Authorities have tended to lie between 10% to 20%, accordingly we are of the view that at least 15% should be used. This would reflect the fact that a number of the large strategic sites suffer from significant environmental & physical constraints and may not be brought forward.
A flexibility allowance of 15% would result in a need to identify at a supply pool of at least 11,370 dwellings that would be available and deliverable.
2. Delivery: Given the shortfall in supply it will be problematic to simply roll the existing supply pool forward to suit a lower housing requirement. Indeed, whilst this might prima facie provide a 5 year supply, it will not address the core issues nor meet the requirements of PPW (in terms of placemaking) and implement the aspirations. It will simply mean that the existing trends are carried forward. There are over 4000 dwellings in category 4 of the JHLAS, this is a considerable number that have failed to deliver within the LDP timeframe to 2021. It is strongly our view that a considerable number of these ought not be carried forward in a review.We await the findings of the review of these sites in terms of viability and delivery. We would accept that if a large number of these sites were replaced with new allocations then our concerns over flexibility may be alleviated.

Response / Recommendation

Comments Noted - The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP. The comment relating to existing sites is also noted, and the need for clarity in respect of the current allocated sites is recognised and will be considered as part of the preparation of the Deposit LDP.

Representation(s)		*Nature*
1773	**Savills (Mr Nick Heard) [3216]**	**Object**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

Linked to this point, the Williams Family suggest that there is a need to undertake a thorough review of sites that are allocated in the Adopted LDP to consider their suitability for their continued allocation in the Revised LDP in light of the emphasis placed in Planning Policy Wales Edition 10 on sites being realistically deliverable and viable. This can only help Carmarthenshire County Council hit the delivery numbers that are required within the County.

In St Clears, for example, three sites ('Adjacent to Britannia Terrace', 'Adjacent to Brynheulog', and 'Adjacent to Gardde Fields') totalling 98 units are allocated in the Adopted LDP and were allocated in its predecessor, the Unitary Development Plan (UDP) which was adopted in 2006. In the case of 'Adjacent to Britannia Terrace' outline planning permission was granted in 2010 (ref. W/21675) though this has been extended on two occasions (refs. W/28769 and W/31167) whilst both the 'Adjacent to Gardde Fields' and the 'Adjacent to Brynheulog' have no relevant planning history since an outline application for residential development which was withdrawn in 2007 (12 years ago) (ref/ W/17287). This means that no units have been constructed on any of the sites.

Whilst it is understood that Carmarthenshire County Council may have aspirations for these sites to be developed there must be genuine concerns about their viability and deliverability - these factors should form part of the rigorous review of all long standing allocated sites. Accordingly, it is suggested that they are not continued as allocations within the Revised LDP on the basis that deliverability has not been demonstrated.

The RLDP's extended lifetime means that there is a requirement to identify new sites for housing. St Clears is both a highly sustainable location as reflected in its position in the settlement hierarchy (as set out in the Adopted LDP) but also the far higher level of housing delivery on allocated housing sites compared to other settlements in St Clears. Despite this, there has been little progress on three sites allocated in the Adopted LDP and questions need to be asked whether these continue to be deliverable and ultimately whether they should continue to be allocated.

Response / Recommendation

Comments Noted - A detailed assessments will be undertaken on all housing allocation within the current LDP, and each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.

Representation(s)		*Nature*
542	**RSAI [3167]**	**Object**

Agent: Lichfields (Mr Arwel Evans) [3166]

Summary:

Support not using the WG 2014 based population projections. Support in principle the fact that a more aspirational population projection has been utilised.

Question whether using past build out rates is appropriate given depressed housebuilding over last 10 years.

Object to the fact that a flexibility allowance of only 593 (5.9%) homes is set out by the Plan. Current adopted LDP had a 3.8% buffer and it is clear that this has not been sufficient to ensure that the housing requirement is met.

Change To Plan Sought:

We recommend that the land supply is increased so that there is at least a 10% buffer for non-delivery. This would assist the Council in meeting the housing requirement.

Response / Recommendation

Disagree in part. The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow.

Comment Noted - The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.

Representation(s)		*Nature*
2103	**Union Tavern Estate [3913]**	**Object**

Agent: Barton Willmore (Joe Ayoubkhani) [646]

Summary:

In summary, SP 3: Providing New Homes is objected to and a housing requirement in line with the existing adopted LDP should be utilised, owing to:
a) Planning policy dictates that the Welsh Government projections should form only one element of the 'key evidence' in respect of assessing housing requirements, and that there are a number of specific contextual, policy and economic considerations which need to be accounted for in the context of Carmarthenshire;
b) Stepping down from the current LDP level would represent a serious risk of triggering enhanced issues of affordability, which already comprises a significant pressure to the local population;
c) Growth at current levels is required to support the construction sector (which is one of the greatest employers in Carmarthenshire); however, the current LDP does not account for the Swansea Bay City Deal. Significant housing growth (over and above current levels targeted) will be required to underpin the circa 10,000 new jobs targeted to be created within the region, a significant number of which will need to be accommodated and housed within Carmarthenshire due to the commitment for investment in the Council area.

Response / Recommendation

The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it, including the role that the Swansea Bay City Deal will play. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow. The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.

Representation(s)		*Nature*
15	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

We support SP3 - Providing new homes

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
2023	**Swallow Investments Limited [3995]**	**Support**

Summary:

Strategic Policy SP3 builds on Strategic Policy SP1 by confirming that in order to meet the requirement for 9,887 dwellings over the LDP period, 10,480 new dwellings will be provided between 2018-2033, in accordance with the LDP's Settlement Framework. My client supports Strategic Policy SP3 - it sets the context for delivering new housing in line with requirements, with a reasonable and realistic 'buffer' to ensure those requirements are satisfied; and therefore represents a sustainable and achievable strategy for meeting the County's housing needs over the LDP period.

Response / Recommendation

Support welcomed.

Paragraph 11.35

Representation(s) — *Nature*

1772 **Savills (Mr Nick Heard) [3216]** — **Object**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

Based upon the growth option selected in Section 9 of the Draft Preferred Strategy, this policy states that in order to ensure the housing requirement of 9,887 units over the Review LDP period is achieved, provision will be need to be made for 10,480 units. This equates to a buffer of 593 units or 6% of the projected population growth.

Paragraph 4.2.10 of Planning Policy Wales provides guidance on the buffer that should be used when setting housing need, stating that:
"The supply of land to meet the housing requirement proposed in a development plan must be deliverable. To achieve this, development plans must include a supply of land which delivers the identified housing requirement figure and makes a locally appropriate additional flexibility allowance for sites not coming forward during the plan period."

The Adopted LDP is based on a housing need of 15,197 (just over 1,000 a year) with a total of 15,778 units allocated equating to a buffer of 581 units or 4%. Since the adoption of the Adopted LDP, the 2018 Annual Monitoring Report (AMR) recognises that the most units delivered in a single year was 608. A number of reasons (some structural and other more local based) are identified in the AMR to explain this under delivery and these are not disputed by The Williams Family but it is also evident that the 4% buffer used was inadequate for the Adopted LDP and that there have been sites that have been allocated repeatedly in local plans despite not having come forward and not coming forward in the Adopted LDP. Whilst the increased buffer that is proposed in the Revised LDP is marginally greater than in the Adopted LDP, The Williams Family suggest that it is still wholly inadequate given the undersupply in the Adopted LDP and there is a need for a buffer of a very minimum of 10% to ensure delivery.

In terms of the amount of growth, ultimately The Williams Family welcome the use of a projection that is based on longer term trends rather than a single base date but suggest there is scope to make an allowance for favourable economic circumstances and use a substantial buffer (minimum of 10%) between need and allocations made to support delivery.

Response / Recommendation

The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.

Representation(s) — *Nature*

1076 **Cai Parry [822]** — **Object**

Summary:

Windfall allowances cannot be demonstrated as being deliverable and therefore should form part of the flexibility allowance only.

Change To Plan Sought:

References to windfalls should be deleted from paragraph 11.35.

Response / Recommendation

Noted. The windfall and flexibility allowances will be calculated and identified within the Deposit Plan in a manner consistent with Welsh Government guidance.

Strategic Policy - SP4

Representation(s)		*Nature*
1648	**Welsh Government (Mr Mark Newey) [13]**	**Comment**

Summary:

The absence of an up to date Local Housing Market Assessment (LHMA) is a major shortcoming as it is a core piece of baseline evidence influencing the scale, type and location of housing. The LHMA is of critical importance to demonstrate that the proposed level and type of housing reflects local needs. Linkages to sustainability issues should also be reconciled; i.e. why it is, or is not appropriate to locate affordable housing in less sustainable communities. At present it is unclear how the distribution of growth relates to areas where it is viable or needed? Whilst the authority refers to an affordable housing target in para 11.42 which mentions the Affordable Housing Delivery Plan 2016-2020 target of 1,000 homes, Policy SP4 'Affordable Homes should set a target for affordable homes. The LDP Manual (edition 3) sets out detailed guidance on viability and includes a checklist for developing an affordable housing policy framework.

Response / Recommendation

Noted. The Council recognises the importance, and role, of an up to date Local Housing Market Assessment (LHMA). The Council is currently working with authorities across the region to prepare an up to date LHMA. The LHMA will inform the preparation of the Deposit LDP.
Policy SP4 will as part of the Deposit LDP set a minimum target for affordable homes.
The reference to the requirements of the Local Development Manual Edition 3 is noted and will be appropriately considered as part of the preparation of the Deposit Plan. However, it should be noted that Edition 3 of the Manual at the time of writing is pending publication and as such could not be considered in the preparation of the Preferred Strategy.

Representation(s)		*Nature*
1788	**Mr John Morris [3777]**	**Comment**

Agent: LRM Planning (Mr. Michael Rees) [3002]

Summary:

We note that through the LDP there was a significant identified housing need (73% of the overall housing requirement). Given the shortfall within the LDP period and under delivery, absent any updated need survey, it seems clear that the existing level of need can only be increased.
Indeed, the most recent housing market assessment indicates that there will be a shortfall of 1,900 affordable homes a year for the next five years between 2015 and 2020. This includes 400 of these that are considered within the highest housing need and in total over the period equates 9,500.
As such it seems that the overarching housing need figure is likely to exacerbate issues of affordability. These issues were identified in 2009, were not addressed within the LDP and are unlikely to be addressed in the current approach, absent an overhaul of under-deliverable sites and
identification of new allocations that can improve delivery.

Response / Recommendation

Noted. The Council recognises the importance, and role, of an up to date Local Housing Market Assessment (LHMA). The Council is currently working with authorities across the region to prepare an up to date LHMA. The LHMA will inform the preparation of the Deposit LDP. The comment relating to existing sites is also noted, and the need for clarity in respect of deliverable sites is recognised and will be considered as part of the preparation of the Deposit LDP.

Representation(s)		*Nature*
2417	**Dyfodol (J W Thomas) [563]**	**Object**

Summary:

In discussing the Authority's Cartrefi Croeso Scheme the respondent raises concerns that people from outside of the County may take advantage of the scheme and in turn negatively impact upon the Welsh language in Carmarthenshire.

Response / Recommendation

Comments are noted. Policies will be developed in the Deposit Revised Local Development Plan to guide the provision of affordable housing to meet local needs. Furthermore, policies will be developed to safeguard the Welsh language.

Representation(s)		*Nature*
16	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

We support SP4 - Affordable Homes

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1683	**Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**	**Support**

Summary:

Affordable Housing
Support in principal Strategic Policy SP4
Both authorities are party to a joint commission with neighbouring authorities for the preparation of a replacement Housing Market Assessment - due for delivery in 2019.

Both Authorities are also part of a joint commission on assessing viability in the region.

Response / Recommendation

Support Welcomed

Strategic Policy - SP5

Representation(s)		*Nature*
1755	**City & County of Swansea (Mr Tom Evans) [3761]**	**Comment**

Summary:

Strategic policy SP5- Strategic Site allocations -We suggest that both Councils work together to utilise the Swansea Strategic Transport Model to understand the impact of Carmarthenshire/s Strategic Site allocations on the highway network.

Response / Recommendation

Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.

Representation(s)		*Nature*
1690	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

We have no comment to make on Policy SP5 as we are involved with both the Llanelli Life Science and Well-being Village and Yr Egin in Carmarthen through the planning process. We will continue to work with your Authority in progressing the development of these sites.

Response / Recommendation

Comments noted.

Representation(s)		*Nature*
818	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

We have no comment to make on Policy SP5 as we are involved with both the Llanelli Life Science and Well-being Village and Yr Egin in Carmarthen through the planning process. We will continue to work with your Authority in progressing the development of these sites.

Response / Recommendation

Comments noted

Representation(s)		*Nature*
17	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

SP5 - Strategic Sites, The fact that there is no reference to two important employment sites from an Economic Development perspective, these being 1) Cross Hands East Strategic Employment Site - a site currently being developed for employment use, which has secured planning consent, delivered phase 1 with phase 2 to be delivered over the next few years; 2) Pibwrlwyd - a site in Carmarthen which has been earmarked for employment use for a number of years and is seen as strategically important for the future growth of Carmarthen and the wider economy of Carmarthenshire. We would be grateful if consideration could be given to include these two sites moving forward.

Response / Recommendation

Noted. The sites have been not been identified as strategic in terms of their potential for inclusion within the Revised LDP.
However, it should be noted that whilst not considered strategic, namely essential to the delivery of the Revised LDP, they will be considered for potential inclusion within the Deposit LDP. In this respect, it is noted that Pibwrlwyd, along with an extension to Cross Hands East, have been submitted as candidate sites representations.

Representation(s)		*Nature*
1078	**Cai Parry [822]**	**Support**

Summary:

Support the allocation of two strategic employment sites. New housing should be located in close proximity to these key travel generators.

Response / Recommendation

Support welcomed.

Strategic Policy SP6

Representation(s) | *Nature*

1645 **Welsh Government (Mr Mark Newey) [13]** | **Comment**

Summary:

Policy SP1 supports the delivery of approximately 5,300 jobs, further evidence and explanation is required to explain how and where the level of job growth will be delivered, including both strategic and non-strategic allocations. It is unclear what the level of employment provision is and for what sector and how this translates into a land requirement for employment uses? The current employment evidence base is inconsistent and unclear. The plan is currently silent on the type and location of key employment sites required to deliver the strategy. Further explanation is also required on how all opportunities arising from the Swansea Bay City Region have been taken into account as part of the economic strategy.
The Deposit Plan should:
provide greater articulation on the link between the plan's housing requirement and target for 5,300 jobs to ensure broad alignment in economic activity and labour force projections and reduce the need for commuting;
identify an employment (ha) / job target and buffer;
identify spatial allocations to meet identified need including broad timing and phasing and defining the land use by Use Class;
if appropriate, include a new policy to protect and identify key employment sites to safeguard for future employment use;
include a policy to support alternative uses on existing employment sites not safeguarded;
explain how allocated sites will be delivered, especially key allocations; and policies to promote and sustain the rural economy.

Response / Recommendation

Noted. Additional evidence will be prepared to support and inform the preparation and content of the Deposit LDP. Note the authority is currently working at a sub-regional level on evidence in respect of employment provision.

Representation(s) | *Nature*

641 **Simrock Holdings Ltd [3217]** | **Comment**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

This policy states that certain sites will be allocated and safeguarded for employment purposes. If CCC is to allocate or safeguard land for employment purposes, such a policy should contain mechanisms for the alternative use of such land subject to a series of criteria which would enable alternative uses to come forward where circumstances exist to justify alternative use subject to other policies within the development plan.

These criteria would enable applications for alternative uses of land or buildings to be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. A failure to introduce such criteria could have the unintended consequences of the long-term vacancy allocated or safeguarded sites where there is no reasonable prospect of a site being used for such purposes to the detriment of the local economy or where alternative uses have merit.

Response / Recommendation

Comments noted. The Revised LDP will allocate and safeguard sufficient land for employment purposes, based upon robust evidence, and in accordance with the requirements set out within Planning Policy Wales (PPW) and Technical Advice Note (TAN) 23. The inclusion of criteria for potential alternative uses on such allocated sites will be considered under evolving policy during preparation of the Deposit LDP.

Representation(s)		*Nature*
613	**Ifan Beynon-Thomas [3198]**	**Object**

Summary:

Strategic Policy - SP 6: Employment and the Economy should acknowledge that tourism uses can support a large number of jobs alongside the traditional B class uses.

Change To Plan Sought:

Strategic Policy - SP 6: Employment and the Economy should be amended to acknowledge that tourism uses can support a large number of jobs alongside the traditional B class uses.

Response / Recommendation

Disagree. The supporting text in respect of policy SP10 in respect of the Visitor Economy makes appropriate reference to the role it plays in creating jobs and its broader role within the economy of Carmarthenshire.

Representation(s)		*Nature*
18	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

We note that SP6 - Employment and Economy as yet does not quantify the level of land to be allocated for employment use in the emerging LDP. We would welcome further dialogue on this matter as the plan evolves. We welcome the fact that section 11.60 refers to the Transformations - a Strategic Regeneration Plan for Carmarthenshire 2015-2030, and that the allocation of employment land reflects the aspirations of the regeneration strategy. We also support the fact that the plan reflects the needs of the city deal and that new sites located outside of the highest tiers of the hierarchy can make a significant contribution to the settlements and communities they serve, especially in rural areas where opportunities for new businesses to establish or existing businesses to expand would be severely constrained in the absence of appropriate sites and premises. We feel this is essential to ensure opportunity and growth is distributed fairly across the county.

Response / Recommendation

Comments noted, further evidence will be prepared in respect of Employment provision within the County. This evidence will be prepared in dialogue with the relevant partners ahead of the publication of the Deposit LDP.

Representation(s)		*Nature*
1691	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We welcome the point made in Section 11.65 on non-operational land providing scope for landscaping, buffer zones etc to be included in the land provision for allocated employment sites. This could also refer to sustainable drainage systems and ecological enhancement and protection.

Response / Recommendation

Support welcomed.

Paragraph 11.65

Representation(s)		*Nature*
819	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

We welcome the point made in Section 11.65 on non-operational land providing scope for landscaping, buffer zones etc. to be included in the land provision for allocated employment sites. This could also refer to sustainable drainage systems and ecological enhancement and protection.

Response / Recommendation

Comments noted / support welcomed.

Strategic Policy SP7

Representation(s)		*Nature*
1637	**Welsh Government (Mr Mark Newey) [13]**	**Comment**

Summary:

The authority must fully justify/evidence that the growth levels are directed to the most sustainable places, related to the scale and location of housing need, not impacting negatively on the Welsh language and is realistic and deliverable.

Response / Recommendation

Noted. See representation 1647.

Representation(s)		*Nature*
1642	**Welsh Government (Mr Mark Newey) [13]**	**Comment**

Summary:

The Welsh Government is concerned that the proposed scale and distribution of housing growth, particularly within Tiers 3 and 4 raises implications of sustainability and potentially negatively impacts on the Welsh language. It is unclear why the more sustainable Service Centres have been allocated the same proportion of growth as Tiers 3 and 4? In addition, it is also unclear why Rural Villages (Tier 4) that have no settlement boundaries, services or facilities would have the same growth levels/capacity as Tier 2 settlements? This point is re-enforced by the Role and Function Topic Paper which highlights that Tier 3 settlements - Sustainable Villages have in broad terms limited services and facilitates. Tier 4 settlements are not even assessed. While the WG acknowledges the rural characteristics of Carmarthenshire, the scale and distribution of growth does not appear commensurate with the principles of sustainable development, nor the Councils own evidence within the SA or the Role and Function Paper. To summarise the Welsh Government has concerns about the scale of growth proposed to Tiers 3 and 4 of the settlement hierarchy conflicts with Planning Policy Wales.

Response / Recommendation

Noted. The scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP - including the proportions allocated to the respective tiers within the hierarchy.

Representation(s)		*Nature*
1647	**Welsh Government (Mr Mark Newey) [13]**	**Comment**

Summary:

Policy SP7 - Welsh language highlights the importance of the language to the area. A topic paper setting out how the Welsh language has influenced the scale of growth and strategy is essential given the significance of the Welsh language for this LDP. The consequence of the level/distribution of housing growth proposed on the Welsh language needs to be clearly articulated especially as past high levels of in migration and international migration are being used to justify the housing requirement. This is a key requirement of TAN 20 that has not been addressed. The SA of the Hybrid Option alludes to positive effects (SA, Figure 6) however the implications of the settlement hierarchy and proposed distribution of growth (SP16) is not conclusive in this respect (SA, Figure 8). There is no indication the authority has considered the potential strategic approaches to the Welsh language, as outlined in paragraph 2.5.2 of TAN 20. The authority should consider a suitable approach, taking account of how it fits with neighbouring authorities, and consider whether there are any anticipated impacts on the language which should be avoided or where they cannot be avoided, require mitigation.

Response / Recommendation

Comments are noted. The Deposit LDP will be supported by a Topic Paper on the Welsh Language and informed by a Welsh Language impact Assessment. Further detailed policies will be provided in the Deposit Plan and these will address matters such as phasing and mitigation, if required.

Representation(s)		*Nature*
741	**Mr Peter Hallam [3271]**	**Comment**

Summary:

The attention given to the essential position of the Welsh language in Carmarthenshire is feeble at best. When talking about a major development such as the proposed village (with many questions currently being raised regarding that development), no practical measures are identified to protect and promote the Welsh language in such a development.
The few words given to the position of the Welsh language and how it can be developed and promoted say nothing, in fact, on how that will be done.

I would like to commend the response given by the Welsh Language Society in its entirety as my response too. It encompasses all that I would like to state.

I can do no better than refer you to the detailed, balanced and incisive response by Cymdeithas yr Iaith (Welsh Language Society). Indeed I am in complete agreement with that response when discussing the whole scheme.

Response / Recommendation

Comments are noted. The Preferred Strategy was subject to a SA/SEA which encompasses the Welsh language. The Deposit LDP will be informed by a Welsh Language Impact Assessment. We welcome ongoing dialogue with Welsh Language Organisations in respect of the impacts of the LDP upon the Welsh language and would welcome any data, evidence or research which they have prepared or are aware of.

Representation(s)		*Nature*
2423	**Dyfodol (J W Thomas) [563]**	**Object**

Summary:

The respondent considers that the Preferred Strategy does not support the Welsh language and is contrary to the County Council and Welsh Government's aspirations. In expressing this, the respondent makes reference to a number of aspects of the LDP and the land use planning system. However, it is considered that the main issue raised is that the level of housing growth proposed in the Preferred Strategy would attract in-migration and in turn negatively impact upon the Welsh language in the County, in noting this, the respondent make specific reference to empty homes in the County.

Response / Recommendation

Comments are noted. The Preferred Strategy was subject to a SA/SEA which encompasses the Welsh language. The number of empty homes in the county were factored into the identified housing need, however, it should be noted that there are a number of factors which lie outside of the scope and control of the LDP and the land use planning system which impact upon the availability of vacant properties. The Plan will continue to be prepared in accordance with national policy and national guidance and aims to support the aspirations of both Carmarthenshire County Council and Welsh Government. We welcome ongoing dialogue with Welsh Language Organisations in respect of the impacts of the LDP upon the Welsh language and would welcome any data, evidence or research which they have prepared or are aware of.

Representation(s)		*Nature*
19	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

SP7 - Welsh Language and Culture, this policy is welcomed and its importance in creating a sense of place and effect on the economy cannot be underestimated.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1703	**Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**	**Support**

Summary:

The Welsh language which continues to be an important component in the social, cultural and economic life of many communities will be protected and supported by managing development sensitively in areas where it has a significant role in the community.

Response / Recommendation

Support Welcomed

Paragraph 11.66

Representation(s)		*Nature*
2431	**Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370]**	**Object**

Summary:

The respondent notes their disappointment noting that they wish to see the LDP protect communities with a high proportion of Welsh speakers being afforded protection from over-development. The respondent also notes that they consider that the Local Authority should devise its own mechanism for assessing the impact of development on the Welsh language and that it has not assessed the impact of the options outlined.

Response / Recommendation

Comments are noted. Policy SP7: Welsh Language and Culture and its supporting text notes that the Plan notes that development proposals which have a detrimental impact on the Welsh language will not be permitted unless it can be mitigated.
The impacts of each Spatial and Growth Option was assessed through the SA/SEA. The Deposit Plan will be informed by a Welsh Language Impact Assessment.

Strategic Policy SP8

Representation(s)		*Nature*
1750	**City & County of Swansea (Mr Tom Evans) [3761]**	**Comment**

Summary:

In accordance with the position set out in the Swansea LDP (Policy RP4 and reasoned justification) Swansea Council will continue to work in collaboration with Carmarthenshire County Council and partners NRW and DCWW to protect the water quality of the Burry Inlet and Loughor Estuary that forms part of the Carmarthen Bay and Estuaries European Marine Site (CBEEMS). This work may include producing and updating a joint agreement or 'Memorandum of Understanding' that will set out the roles and responsibilities of each organisation in the provision of foul water infrastructure to safeguard against any unacceptable detrimental impacts on the Estuary arising from additional foul flows from new development. DCWW has indicated that Llannant WWTWs, that discharges into the CBEEMS and has a catchment covering both authorities, is reaching capacity. In advance of DCWW undertaking the necessary improvement to Llannant Waste Water Treatment Works through their AMP it may be necessary to require development in its catchment to provide compensatory surface water removal from the foul water system. The Swansea LDP acknowledges that ultimately in order to protect water quality of the Burry Inlet and Loughor Estuary a Nutrient Management Plan may be required This is a key trans-boundary issue which should be appropriately reflected in the LDP evidence base and associated SA and HRA documents.

Response / Recommendation

Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. It is noted that in relation to the Memorandum of Understanding, there are other stakeholders in addition to the Council and the respondent and as such this matter will be fully explored in a collaborative manner as the Plan making process proceeds towards the Deposit LDP. The Council fully recognises that this is a key trans-boundary issue which should be appropriately reflected in the LDP evidence base and associated SA and HRA documents. Reference should be made to the Council's response to representation 1704.

Representation(s) *Nature*

1756 **City & County of Swansea (Mr Tom Evans) [3761]** **Comment**

Summary:

Strategic Policy SP8 - Infrastructure - We suggest that the Swansea Infrastructure Delivery Plan (IDP) (see ED056b Revised IDP) which supports the Swansea LDP could provide useful evidence to inform consideration of the capacity of local infrastructure. The IDP contains detailed requirements for infrastructure provision on allocated sites along the Swansea side of the Carmarthenshire boundary.

Response / Recommendation

Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.

Representation(s) *Nature*

1757 **City & County of Swansea (Mr Tom Evans) [3761]** **Comment**

Summary:

It is noted that there are number of candidate sites within the Hendy area where the local transboundary and in-combination effects of allocations should be taken into consideration during the site assessment process.
We suggest that the impact of planned infrastructure provision and improvements within the Swansea boundary could usefully be taken into consideration in the preparation of the Carmarthenshire Deposit Plan, particularly with regard to the site selection process and the assessment of impact of sites on the highways network.
In particular, reference could usefully be made to
* Swansea Infrastructure Development Plan,
* LDP Appendix 3 Site Requirements, L
* DP Appendix 5 - Transport Proposals Priority Measures
* Infrastructure requirements of LDP Strategic Site Policies SD A and SD H: which include on and off-site highways improvements, provision of a new primary school and contributions to improvements at Pontarddulais Railway station).

Response / Recommendation

Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. The Site Assessment Methodology will allow for the consideration of candidate sites, including those submitted within the Hendy area.

Representation(s)		*Nature*
1704	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

The MOU no longer relates to any HRA for the coastal area of Llanelli. NRW are satisfied that any development within the area will be captured by the overarching HRA for the LDP.

SuDS must be designed and built in accordance with the SuDS Standards and Schemes must be approved by the LA acting in its SAB role. Water quality mitigation should be captured with the SABS which supersedes the existing MOU. NRW advocate the inclusion of a policy/strategy/supporting text with the LDP supporting no new connections of surface water to the main foul sewerage system from new development sites.

Response / Recommendation

Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. It is noted that in relation to the Memorandum of Understanding, there are other stakeholders in addition to the Council and the respondent and as such this matter will be fully explored in a collaborative manner as the Plan making process proceeds towards the Deposit LDP. Reference should also be made to the Council's response to representation 1750. Adequate referencing to the SAB (and indeed the relationship between the planning and SAB application processes) will be required and due consideration will also be given to the implications of SAB consent in the site assessment methodology (noted that some allocations will be based on approvals pre SUDS implementation).

Representation(s)		*Nature*
820	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

We support the recognition given to the importance of infrastructure capabilities within the policy and supporting paragraphs. We also note your definition for infrastructure includes roads, transport facilities, water supplies, sewerage and associated waste water treatment facilities, energy supplies and distribution networks and telecommunications infrastructure.

We acknowledge that certain sites will need to be appropriately phased thorough the development process such as the proposed phased plan for the Llanelli Life Science and Well-being Village.

Response / Recommendation

Comments noted / support welcomed.

Representation(s)		*Nature*
1593	**mr william Phillips [3566]**	**Comment**

Summary:

The Strategic Policy (SP8) is reasonable and correct, to a certain extent However, recent experience has demonstrated that developers are able to submit acceptable plans, to cater for deficient infrastructure, until Planning permission has been granted. Thereafter, the plans are scrapped, Houses are allowed, by the Planners, to be completed, eg. without sewerage, DCWW are then obliged under the Water Act of 1991, to provide sewerage services for those dwellings. INFRASTRUCTURE MUST BE IN PLACE, PRIOR TO THE GRANTING OF PLANNING CONSENT to avoid such consent being obtained through "smoke and mirrors."

Response / Recommendation

Noted. The Council will continue to work closely with infrastructure providers and developers to ensure sites are deliverable and that adequate services are available.

Representation(s)		*Nature*
1079	**Cai Parry [822]**	**Object**

Summary:

Support reference to location development close to existing infrastructure. Object to references to viability being relegated to the supporting text. Viability should be directly referred to within the policy text itself.

Change To Plan Sought:

The final paragraph of Strategic Policy SP 8 should be amended as follows:

"Where financially viable, planning obligations may be sought to ensure that the infrastructure, services and facilities needed to deliver and support the development are delivered".

Response / Recommendation

Disagree. Financial viability is implicit within this policy and is adequately covered within the supporting text.

Representation(s)		*Nature*
1669	**Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**	**Support**

Summary:

As outlined above, the availability or capacity of infrastructure is key in determining a settlement's sustainability. As such, we welcome the provisions of this policy in requiring development proposals to ensure sufficient capacity is available in infrastructure or if not, that suitable arrangements are in place to provide the necessary infrastructure capacity.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
20	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

We support the principles contained in SP8- Infrastructure and welcome the fact that development will be supported by adequate infrastructure. Reference to the plan being "sufficiently responsive and flexible to market demand up to 2033.." is supported.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1692	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We support the recognition given to the importance of infrastructure capabilities within the policy and supporting paragraphs. We also note your definition for infrastructure includes roads, transport facilities, water supplies, sewerage and associated waste water treatment facilities, energy supplies and distribution networks and telecommunications infrastructure.

We acknowledge that certain sites will need to be appropriately phased thorough the development process such as the proposed phased plan for the Llanelli Life Science and Well-being Village.

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

551 **RSAI [3167]** | **Support**

Agent: Lichfields (Mr Arwel Evans) [3166]

Summary:

It is clear that Llangennech is a sustainable settlement which benefits from good infrastructure and therefore merits its position in the settlement hierarchy. Development should therefore be directed to sustainable sites within or adjacent to the settlement.

Response / Recommendation

support welcomed

Paragraph 11.71

Representation(s) | *Nature*

1670 **Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]** | **Comment**

Summary:

With specific regard to water and sewerage infrastructure, where insufficient capacity is available and where no reinforcement works are programmed within the respective Capital Investment Programme, the requisition provisions can be entered into for the water and sewerage infrastructure. The requisition provisions do not apply in the instance of wastewater treatment works (WwTW), and as such planning obligations may be necessary.

Response / Recommendation

Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.

Strategic Policy - SP9

Representation(s) | *Nature*

1649 **Welsh Government (Mr Mark Newey) [13]** | **Comment**

Summary:

The latest Gypsy Traveller Accommodation Needs Assessment (GTAA) approved by Welsh Ministers does not form part of the evidence base to inform the accommodation needs of Gypsy and Traveller families. The Authority must ensure the GTAA referenced in the reasoned justification to Policy SP9 is the version currently signed-off by Welsh Ministers.
To identify the level of need and timescales for delivery, the GTAA must cover the entire replacement plan period (2018-2033), which it does not at present. By Deposit stage, a new GTAA must be prepared and agreed by Welsh Ministers with provision made for appropriate and deliverable site allocations to meet any need in the timescales identified. We note the Council are currently undertaking a separate call for gypsy and traveller sites (until April), including the methodology for site selection. This is a key issue for the authority and failure to identify the level of need and allocated sites in the Deposit Plan to meet the identified need is likely to result in the plan being unable to be found sound. In the Deposit plan, the results of the new GTAA must be clear in terms of the total and type of need and timescales for meeting this up to 2033.

Response / Recommendation

**Noted. The Council recognises the importance of the Gypsy and Traveller Accommodation Assessment (GTAA) in respect of the LDP, and is in the process of developing a revised GTAA through to 2033.
As noted by the respondent, a 'call for sites' in respect of Gypsy and Traveller provision is underway the outcome of which will inform the preparation of the Deposit LDP.**

Representation(s)		*Nature*
21	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

SP9 - Gypsy and Traveller Provision, policy is noted.

Response / Recommendation

Comments noted

Representation(s)		*Nature*
1684	**Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**	**Support**

Summary:

Support in principal Strategic Policy SP9.

Does the issue regarding accommodation of travelling show people need explicit reference in the Policy itself?

Response / Recommendation

Comment Noted. An updated Gypsy and Traveller assessment will be undertaken prior to the Deposit LDP which will clarify any issues regarding accommodation needs for Travelling Show people and how this is explicitly addressed within the Policy.

Strategic Policy SP10

Representation(s)

646

WYG PLANNING & ENVIRONMENT (Louise Darch) [598]

Nature

Comment

Summary:

The objectives of Strategic Policy SP10 are broadly welcomed and supported. The respondent in promoting the status of Ffos las racecourse makes the following specific points in respect to Strategic Policy SP10:

1. Strategic Policy 10 should explicitly reference and promote Ffos Las as a key visitor attraction and strategic priority.
Ffos Las directly contributes to the delivery of the following Preferred Strategy strategic objectives:
* SO2 - it promotes wellbeing opportunities through access to leisure and recreational facilities as well as the countryside;
* SO4 - promotes access to leisure facilities and work opportunities;
* SO12 - provides opportunity for investment & innovation in rural and urban areas, delivers employment and contributes at a regional level to the delivery of the Swansea Bay City Deal;
* SO13 - provides a sustainable & high quality all year-round tourism destination.
Planning Policy Wales stipulates that there is a need for local planning authorities to establish a: framework for well-located, good quality sport, recreational and leisure facilities, and develop clear policies for the provision, protection and enhancement of sport, recreation and leisure facilities; (PPW, para 4.5.2). References the duty to improve the social and cultural well-being of Wales, in accordance with the Well-being of Future Generations (Wales) Act 2015. Suggests the following wording: The Visitor Economy Proposals for tourism and leisure related developments will be supported at Ffos Las and other important visitor attractions.

Ffos Las is an important local employer and a wealth-generating, multi-faceted visitor attraction to Carmarthenshire. It is a regionally important facility.

2. Ffos Las promoted as a preferred location for Visitor Economy Development
The strategic policy wording should make direct reference to the Ffos Las racecourse as a preferred location for new tourism and leisure related development, including accommodation in accordance with PPW.

Response / Recommendation

Whilst the role of Ffos Las is noted, it is not considered necessary or appropriate to specifically identify a single facility as part of the strategic policy. The potential role of the facility and its contribution in light of the content of the Plan and the provisions of national planning policy will be considered as part of the deposit LDP.

Representation(s)

615 **Ifan Beynon-Thomas [3198]**

Nature

Object

Summary:

The policy should be amended to acknowledge that small scale tourist developments will be allowed outside settlement limits where suitable sites are identified and a well considered scheme is put forward. This is especially true in the context of agricultural diversification.

Change To Plan Sought:

The policy should be amended to acknowledge that small scale tourist developments will be allowed outside settlement limits where suitable sites are identified and a well considered scheme is put forward. This is especially true in the context of agricultural diversification.

Response / Recommendation

Disagree. The points raised by the respondent will be more appropriately considered as part of the preparation of the Deposit LDP. In this regard they are not considered appropriate for a strategic policy as they relate to matters considered through specific policies.

Representation(s)		*Nature*
22	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

SP10 - The Visitor Economy is fully supported as tourism plays an important part in the economy of Carmarthenshire and a planning framework that acknowledges that markets change and that the plan needs to appreciate this is very positive. The emphasis on high quality is also supported as this will assist in driving the local economy forward, as it's likely to attract jobs of a higher quality which is welcomed.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1697	**Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**	**Support**

Summary:

Support SP10 The Visitor Economy.
Both Authorities recognise the importance of the visitor economy to west Wales and aim to support the sector and attract visitors all year round. Both also recognise that some attractions require a countryside setting but that this should be the exception, and the majority of tourism related development being sustainably located.

Response / Recommendation

Support Welcomed

Representation(s)		*Nature*
1694	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We welcome the inclusion of landscape and nature conservation as assets which require protection for our future generations as noted in Section 11.89, and the reference to cumulative impacts within Section 11.94.

Response / Recommendation

Support welcomed.

Paragraph 11.89

Representation(s)		*Nature*
823	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

We welcome the inclusion of landscape and nature conservation as assets which require protection for our future generations as noted in Section 11.89, and the reference to cumulative impacts within Section 11.94.

Response / Recommendation

Support welcomed.

Paragraph 11.91

Representation(s)		*Nature*
698	**Lynda James [3039]**	**Support**

Summary:

The Letitia Cornwallis "vision" fits with rural development and tourism and sits in SC27 so is seen as a sustainable community.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Paragraph 11.94

Representation(s)		*Nature*
822	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

We welcome the inclusion of landscape and nature conservation as assets which require protection for our future generations as noted in Section 11.89, and the reference to cumulative impacts within Section 11.94.

Response / Recommendation

Support welcomed.

Strategic Policy - SP11

Representation(s)		*Nature*
1672	**Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**	**Comment**

Summary:

We note that there is no reference within the PS to the established SuDS Approval Boards (SABs)as set out in the Flood and Water Management Act 2010 (Schedule 3).

The requirement for new developments to obtain SAB consent may result in layouts and densities changing in some housing developments, but the onus is on landowners/developers to consider SuDS prior to master planning their site which will ensure there is no need to retrofit schemes into the design at a later stage.

Planning and SAB application processes are intrinsically linked, we would suggest including reference to it within the Preferred Strategy.

Response / Recommendation

Comments noted. Whilst the promotion of SuDS is referenced within criteria (g) of this SP11 and criteria (b) of SP15, it is accepted that there is a need to elaborate upon references to the SuDS Approval Boards (SABs). At the time the Preferred Strategy was published the process of setting up and formalising the Carmarthenshire SAB was ongoing, however it will be well up and running by the time the Deposit LDP is published. As such, adequate referencing to the SAB (and indeed the relationship between the planning and SAB application processes) will be required and due consideration will also be given to the implications of SAB consent in the site assessment methodology (noted that some allocations will be based on approvals pre SUDS implementation).

Representation(s)		*Nature*
1695	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

We welcome the inclusion of this policy and the supporting text aimed at facilitating sustainable development.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
824	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

We welcome the inclusion of this policy and the supporting text aimed at facilitating sustainable development

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1671	**Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**	**Support**

Summary:

We specifically welcome the inclusion of criteria g) in Policy SP11. Disposing of surface water in a sustainable manner will ensure that it will not communicate with the public sewerage network, thereby having the double effect of protecting the environment and ensuring there is sufficient capacity in the public sewerage network for foul-only flows from development sites.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
23	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

SP 11- Place-making, Sustainability and High Quality Design, SP13 - Protection and Enhancement of the Natural Environment and SP14 - Protection and Enhancement of the Built and Historic Environment. We fully support the principles laid out in these Strategic Policies and see place making and protection of the natural and built environment as a major driver in creating distinctiveness throughout the county. Such policies will improve the quality of life for residents and increase the quality of offer to visitors, which ultimately will have a positive impact upon the economy of Carmarthenshire.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1688	**Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**	**Support**

Summary:

Climate Change
Support in principle. Support Policy SP11 Placemaking, sustainability and High quality Design, and SP15 Climate change.
Note: See comment across
The Authorities have a shared understanding of the need to plan for climate change and to mitigate its impacts and to provide for high quality design to ensure that new development is adaptable to climate change.

The policy approach could usefully address the potential location and scale of future flooding, particularly coastal areas and communities affected by predicted sea-level change, and coastal change areas included in the South Wales Shoreline Management Plan 2.

Response / Recommendation

Support Welcomed and Comments Noted.

Strategic Policy - SP12

Representation(s)		*Nature*
1643	**Welsh Government (Mr Mark Newey) [13]**	**Comment**

Summary:

To demonstrate delivery and sustainable distribution of growth across the settlement hierarchy the Deposit plan must; Identify spatial distribution and components of housing land supply as allocations, commitments and windfall sites (small and large) for each settlement tier in which they will be delivered (See LDP Manual, Ed 3). The policy framework must clearly articulate the type and scale of development that would be appropriate at each tier of the hierarchy. Policy SP12 Rural Development needs strengthening in this respect.

Response / Recommendation

Noted. The matters identified by the respondent will be considered as part of the preparation of the Deposit LDP.
The reference to the requirements of the Local Development Manual Edition 3 is noted and will be appropriately considered as part of the preparation of the Deposit Plan. However, it should be noted that Edition 3 of the Manual at the time of writing is pending publication and as such could not be considered in the preparation of the Preferred Strategy.

Representation(s)		*Nature*
1707	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

Considerations for agricultural development should consider the content of the Chief Planning Officer letter of 12/06/18 on intensive agriculture. Consideration must be given to all wastes arising, cumulative impacts and water quality.

The new Agricultural Pollution Regulations will lay down new government policy regarding agriculture. The regulations will apply to all holdings from 01/01/20, with transitional periods for some elements to allow farmers time to adapt and ensure compliance. The regulations will replicate good practice measures focussed on good nutrient management. Further information on what will need to be done and by when will be provided in the near future.

Response / Recommendation

Comments noted. This matter will be given full consideration as part of the preparation of the Deposit LDP. The Council looks forward to receiving any guidance associated with the Agricultural Pollution Regulations and the content of Chief Planning Officer's letter of 12/06/18 on intensive agriculture is duly noted. The Sustainability Appraisal and Habitats Regulations Assessment will provide an important role in ensuring that the Plan as a whole does not impact negatively

Representation(s)		*Nature*
2420	**Dyfodol (J W Thomas) [563]**	**Object**

Summary:

The respondent supports the section on rural development, however, has concerns that there is no reference to the welfare of the Welsh language in developments in the towns and post-industrial area in the south-east of Carmarthenshire.

Response / Recommendation

Policy SP7 Welsh Language and Culture is applicable to the whole County. Specific reference is made to paragraph 11.68 which explicitly notes that the policy is not restricted to specific parts of the County and applies to the County in its entirety.

Representation(s)		*Nature*
24	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

SP 12 - Rural Development recognises the good work being carried out by the County Council's Rural Task Force. Recognition of their work on the economy and employment is positive and we welcome the fact that the preferred strategy will consider this work in developing policies in relation to rural Carmarthenshire.

Response / Recommendation

Support welcomed.

Strategic Policy - SP13

Representation(s)		*Nature*
1652	**Welsh Government (Mr Mark Newey) [13]**	**Comment**

Summary:

Opportunities to secure enhancement of biodiversity and the resilience of ecosystems have to be taken at the plan level in order to fulfil duties under Section 6 of the Environment Act. The plan is the opportunity to take a comprehensive approach towards protection and enhancement and to set out what can be achieved. This approach goes beyond what can be achieved as part of identifying allocations.
Strategic Policy 13 - Protection and Enhancement of the Natural Environment should be re-framed as 'Maintaining and Enhancing the Natural Environment'. It would be helpful to understand how the Green Infrastructure Assessment (as required in PPW10) will inform the implementation of this policy and also the relationship of this policy to Strategic Policy 8: Infrastructure.

Response / Recommendation

Agree. The title of the policy to be amended as follows: 'Maintaining and Enhancing the Natural Environment'.
The Revised LDP will be supported and underpinned by a Green Infrastructure Assessment (GIA). This will include those policy areas referenced by the respondent and will be published ahead of the publication of the Deposit LDP. The GIA seeks to inform the policy provisions of the Plan as a whole and not only those policy areas referenced by the respondent.

Representation(s)		*Nature*
826	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Comment**

Summary:

Acknowledge HRA has been undertaken.
Concerned with the wording in the policy.

Response / Recommendation

Reference is made to the Council's response to representation reference 1699.

Representation(s)		*Nature*
1699	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Object**

Summary:

We are concerned about the following wording within the policy:
"Proposals must reflect the role an ecologically connected environment has in protecting .....

Whilst recognising the importance of ecological connections, this is one element of the many that contributes to defining the landscape and sense of place. Other important elements include geology, landform, landcover, field boundaries, buildings, historic features, to name a few. Landscape is not a sub-set of ecological connections and the strategic policy needs to reflect a broader understanding of the natural environment and landscape if account is to be taken of landscape character and sense of place.

Response / Recommendation

Agreed. This Strategic Policy should seek to set a strategic framework for the promotion of Sustainable Management of Natural Resources. Add the following wording to the policy at the last line of the Policy- ...to a sense of Well-being "and the principles of the Sustainable Management Of Natural Resources". Reference is made to the Council's response to representation reference 826.

Representation(s)		*Nature*
1080	**Cai Parry [822]**	**Object**

Summary:

BDW Homes considers that the wording of Policy SP 13 is too onerous, on the basis that paragraph 6.4.3 of Planning Policy Wales (Edition 10) states that "Development plan strategies, policies and developments must consider the need to....secure enhancement of and improvements to ecosystem resilience by improving diversity, condition, extent and connectivity of ecological networks". It is noted that Planning Policy Wales does not require all developments to secure enhancements to biodiversity, only to consider it. This comprises recognition by the Welsh Governments that enhancements to biodiversity interests may not always be feasible or appropriate.

Change To Plan Sought:

The wording of the first paragraph of Strategic Policy SP 13 should therefore be amended as follows:

"Proposals for development will be expected to protect and, where appropriate, enhance the County's natural environment".

Response / Recommendation

Noted. The comments by the respondent in respect of Strategic Policy SP 13 are duly noted. Any necessary amendments to wording will be considered as part of the preparation of the Deposit LDP, to ensure that it accords with Planning Policy Wales.

Representation(s)		*Nature*
2389	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

SP 11- Place-making, Sustainability and High Quality Design, SP13 - Protection and Enhancement of the Natural Environment and SP14 - Protection and Enhancement of the Built and Historic Environment. We fully support the principles laid out in these Strategic Policies and see place making and protection of the natural and built environment as a major driver in creating distinctiveness throughout the county. Such policies will improve the quality of life for residents and increase the quality of offer to visitors, which ultimately will have a positive impact upon the economy of Carmarthenshire.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1705	**Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**	**Support**

Summary:

Both Plans seek to ensure that their Plan areas natural and historic environment and landscape will be protected from inappropriate development and, where possible, enhanced.

It would be beneficial if the Plan explicitly made reference to needing to take account of not compromising the qualities of important landscapes including the Pembrokeshire Coast and Brecon National Parks. (see paragraph 6.36 of Planning Policy Wales 10).

Response / Recommendation

Comments Noted

Representation(s) | *Nature*

1696 **Natural Resources Wales (Miss Sharon Luke) [3253]** **Support**

Summary:

We welcome this policy and acknowledge that a Habitats Regulation Assessment (HRA) has been undertaken to assess the impacts of the Plan on European protected sites (including those in candidate stage of designation).

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

1708 **Natural Resources Wales (Miss Sharon Luke) [3253]** **Support**

Summary:

Caeau Mynydd Mawr SPG - NRW agree that the SPG is still required as part of the revised LDP.

Response / Recommendation

Comments noted/Support welcomed. The Council looks forward to continuing its constructive dialogue with the respondent along with other stakeholders as the Plan making process proceeds towards the Deposit LDP. The Council will publish a robust suite of evidence to support the SPG. Reference is also made to the Habitats Regulations Assessment.

Strategic Policy - SP14

Representation(s) | *Nature*

1792 **Whitland Town Council (Vicky Mitchell) [91]** **Comment**

Summary:

I would like to request that SPG is also included within the LDP. This should state that any longstanding empty property site or Chapel could become mixed use after X number of years. This would encourage flexibility and trigger economic activity. This should also apply to Town Centre shops, disused rural buildings and particularly land within the UDP/LDP that has remained undeveloped or tied up in pension schemes for decades limiting the possibility of potential active developers being included. Eg land at Spring gardens has been included and undeveloped for half a century. Derelict or unused parts of the former creamery site for a quarter of a century. Other sites unused for more than a decade.
NB. X not to mean half a century. 25 years or less is extremely reasonable dependent on type of dereliction or non use.

Response / Recommendation

Noted. Issues such as those proposed by the respondent relate to the deliverability of sites and will be considered during the drawing up of policies as part of the Deposit LDP. SPG will be produced on specific issues, however it is too early to say whether they will cover the issues proposed by the respondent.

Representation(s) | *Nature*

2390 **Carmarthenshire County Council (Mr Stuart Walters) [2345]** **Support**

Summary:

SP 11- Place-making, Sustainability and High Quality Design, SP13 - Protection and Enhancement of the Natural Environment and SP14 - Protection and Enhancement of the Built and Historic Environment. We fully support the principles laid out in these Strategic Policies and see place making and protection of the natural and built environment as a major driver in creating distinctiveness throughout the county. Such policies will improve the quality of life for residents and increase the quality of offer to visitors, which ultimately will have a positive impact upon the economy of Carmarthenshire.

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

1706 **Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]** | **Support**

Summary:

Both Plans seek to ensure that their Plan areas natural and historic environment and landscape will be protected from inappropriate development and, where possible, enhanced.

Response / Recommendation

Support Welcomed

Paragraph 11.120

Representation(s) | *Nature*

699 **Lynda James [3039]** | **Support**

Summary:

Cornwallis is a listed building with much history attached.

Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

Strategic Policy - SP15

Representation(s) | *Nature*

1651 **Welsh Government (Mr Mark Newey) [13]** | **Comment**

Summary:

LPAs should take a leadership role in pro-actively planning for renewable and low carbon energy. LPAs should fully utilise evidence in their renewable energy assessments (REA) to develop locally specific policies, set renewable energy targets and direct development to the most appropriate locations. It is extremely disappointing that the Preferred Strategy document does not have a specific policy on renewable energy, nor is it clear how opportunities for decarbonisation and renewable energy has influenced the strategy. There is currently no evidence on this topic.

Response / Recommendation

Noted. The Council will seek to prepare and publish a Renewable Energy Assessment as part of its evidence base in support of the Deposit LDP. This will inform locally specific policies and will seek to set the renewable energy targets and locations referenced by the respondent within the representation. Whilst it is noted that there is no strategic policy in respect of renewable energy, such matters are adequately considered as part of Strategic Policy SP15 Climate Change. Further detailed renewable energy policies will be set out as part of the Deposit LDP.

Representation(s) | *Nature*

271 **RWE Innogy UK Ltd (Miss Eleri Davies) [471]** | **Comment**

Summary:

Support the reference in Strategic Policy 15 (SP15) 'Climate Change' criterion c. to the energy hierarchy, including "increasing the supply of renewable energy" but this is the only direct reference to this topic in the entire Preferred Strategy.

Response / Recommendation

Comments noted.

Representation(s)		*Nature*
273	**RWE Innogy UK Ltd (Miss Eleri Davies) [471]**	**Comment**

Summary:

Whilst appreciating that the Preferred Strategy is broad brush, it does contain fewer renewable energy references than is usual. Further rounds of consultation will clearly include the Council's detailed approach to renewable energy policies. It is positive that the LDP Review Report (February 2018) acknowledged the need for a Renewable Energy Assessment to underpin the renewable energy policies to be contained within the Revised Local Development Plan (LDP).

Further consideration needs to be given to renewable energy in the Deposit LDP which will include detailed and specific policies.

Response / Recommendation

Comments noted. A Renewable Energy Assessment will be undertaken to inform the policies of the Plan, and more detailed policies will also be included with specific reference to renewable energy.

Representation(s)		*Nature*
25	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

SP15 - Climate Change, policy noted.

Response / Recommendation

Comments Noted.

Representation(s)		*Nature*
1702	**Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**	**Support**

Summary:

Both plans have regard to the need to generate more electricity from renewable sources. Pembrokeshire Coast National Park Authority has a renewable energy strategy policy seeking the delivery of appropriate renewable energy developments.

Both Authorities implement joint guidance on assessing the cumulative impact of wind turbines
It would be useful to confirm if Carmarthenshire intends to bring forward the Cumulative Impact of Turbine Guidance in the replacement Local Development Plan.

Carmarthenshire includes renewable energy as part of Strategic Policy 15: Climate Change (part c), but has no specific renewable energy policy at present.

Response / Recommendation

Comments Noted

Representation(s)		*Nature*
1700	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We support the inclusion of this policy and supporting text. We acknowledge that your Authority has commissioned a strategic flood consequence assessment for Carmarthenshire which will be used to inform policies and allocations, ensuring the appropriate siting of development from areas at flood risk now and those that become vulnerable to flood risk in the future because of climate change. We support the stance that development which does not accord with the provisions of Technical Advice Note (TAN) 15 will be resisted.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
827	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We support the inclusion of this policy and supporting text. We acknowledge that your Authority has commissioned a strategic flood consequence assessment for Carmarthenshire which will be used to inform policies and allocations, ensuring the appropriate siting of development from areas at flood risk now and those that become vulnerable to flood risk in the future because of climate change. We support the stance that development which does not accord with the provisions of Technical Advice Note (TAN) 15 will be resisted.

Response / Recommendation

Support welcomed.

Paragraph 11.134

Representation(s)		*Nature*
272	**RWE Innogy UK Ltd (Miss Eleri Davies) [471]**	**Comment**

Summary:

The reference to Welsh Government policies/targets is welcomed, and Carmarthenshire County Council should make a commitment to developing policies to optimise renewable energy and low carbon energy generation as part of the process of preparing the Revised Local Development Plan.

Response / Recommendation

Comments noted.

Paragraph 11.135

Representation(s)		*Nature*
1701	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We also welcome the commitment to help secure and protect carbon sinks (including peat) noted in section 11.135.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
828	**Natural Resources Wales (Miss Sharon Luke) [3253]**	**Support**

Summary:

We welcome the commitment to help secure and protect carbon sinks (including peat) noted in section 11.135.

Response / Recommendation

Support welcomed

Strategic Policy - SP16

Representation(s)		*Nature*
1641	**Welsh Government (Mr Mark Newey) [13]**	**Comment**

Summary:

Settlement Framework and Distribution (Policy SP16: Sustainable Distribution - Settlement Framework) - We note the authority's new spatial framework set out in SP16 differs from the adopted plan and adopts a 'cluster' approach. There are 6 clusters of functionally linked areas and within each cluster there are four tiers of settlements (Tier 1: Principal Centres, Tier 2: Service Centres, Tier 3: Sustainable Villages, Tier 4: Rural Villages). All settlements are 'predominantly' functionally linked within the cluster, with lower tier settlements linked to upper tier settlements that have more services and facilities. The WG does not object to the principle of this approach, the key concern is the scale of growth directed to each tier relative to the role and function and sustainability of places.

The Role and Function Topic Paper, includes an analysis of the key services and facilities within Tiers 1-3. The reasoned justification of SP16 states that growth will be broadly distributed as follows:

- Principal Centres 50-55% (will have a settlement boundary)
- Service Centres 15-20% (will have a settlement boundary)
- Sustainable Villages 15-20% (will have a settlement boundary)
- Rural Villages 15-20% and (no settlement boundary)
- Non Defined Rural Settlements (1%) (no settlement boundary)

The Welsh Government is concerned that the proposed scale and distribution of housing growth, particularly within Tiers 3 and 4 raises implications of sustainability and potentially negatively impacts on the Welsh language. It is unclear why the more sustainable Service Centres have been allocated the same proportion of growth as Tiers 3 and 4? In addition, it is also unclear why Rural Villages (Tier 4) that have no settlement boundaries, services or facilities would have the same growth levels/capacity as Tier 2 settlements? This point is re-enforced by the Role and Function Topic Paper which highlights that Tier 3 settlements - Sustainable Villages have in broad terms limited services and facilitates. Tier 4 settlements are not even assessed. While the WG acknowledges the rural characteristics of Carmarthenshire, the scale and distribution of growth does not appear commensurate with the principles of sustainable development, nor the Councils own evidence within the SA or the Role and Function Paper. To summarise the Welsh Government has concerns about the scale of growth proposed to Tiers 3 and 4 of the settlement hierarchy conflicts with Planning Policy Wales.

To demonstrate delivery and sustainable distribution of growth across the settlement hierarchy the Deposit plan must; Identify spatial distribution and components of housing land supply as allocations, commitments and windfall sites (small and large) for each settlement tier in which they will be delivered (See LDP Manual, Ed 3). The policy framework must clearly articulate the type and scale of development that would be appropriate at each tier of the hierarchy. Policy SP12 Rural Development needs strengthening in this respect.

Response / Recommendation

Noted. The scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP - including the proportions allocated to the respective tiers within the hierarchy. Matters in relation to the Welsh language will be considered as part of the LDP's evidence base and within the Sustainability Appraisal. See representation 1647.

Representation(s)		*Nature*
1638	**Welsh Government (Mr Mark Newey) [13]**	**Comment**

Summary:

The authority must fully justify/evidence that the growth levels are directed to the most sustainable places, related to the scale and location of housing need, not impacting negatively on the Welsh language and is realistic and deliverable.

Response / Recommendation

Noted. See representation 1647.

Representation(s) | *Nature*

1587 **The Williams Family . [3585]** | **Comment**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

Despite tripling the number of Service Centres, the amount of growth which is to be directed to them is, at most, to be doubled. From a purely mathematical perspective it is suggested that this percentage is too low.

The second is to stress the suitability of St Clears to accommodate further growth as a Service Centre. As discussed previously, the settlement is one of just six Service Centres which were included within the tier in the ALDP, has delivered the largest number and highest percentage of units out of all of the ALDP Service Centres demonstrating its ability to accommodate growth, has a broad range of services, and is strategically located at the junction of the A40 and the A477.

Response / Recommendation

Comments Noted - Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. Consideration will be given to those sites which have failed to deliver in the adopted LDP. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.

Representation(s) | *Nature*

647 **WYG PLANNING & ENVIRONMENT (Louise Darch) [598]** | **Comment**

Summary:

The respondent makes the following comments on the Preferred Strategy:

Strategic Policy SP16 indicates that the provision of growth and development will be directed to sustainable locations. Ffos Las is a sustainable location for continued investment. It lies contiguous with the settlement of Carway. There should be a presumption in favour of sustainable development at Ffos Las. It should lie within the defined settlement, where there is a presumption in favour sustainable development, provided the development accords with other local plan policies. It is logical therefore that the settlement framework reflects this.

Response / Recommendation

Noted. The potential allocation of Ffos Las will be considered as part of the preparation of the Deposit LDP, and in accordance with the site assessment methodology.

Representation(s) | *Nature*

645 **Simrock Holdings Ltd [3217]** | **Comment**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

The removal of Llangennech from the Llanelli Growth Area is consistent with the approach taken through the DPS of removing surrounding settlements from the Principal Centres and giving them their own place in the settlement hierarchy. If CCC is to progress with this approach and Llangennech is to be a Service Centre, SHL would stress Llangennech's highly sustainable location for growth given its relationship with Llanelli, proximity to the local transport network, and strategic position between Carmarthenshire and Swansea.

Response / Recommendation

Comments Noted. Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.

Representation(s)		*Nature*
1714	**Mr Steven Roberts [3020]**	**Object**

Summary:

We object to draft Policy SP16 'Sustainable Distribution - Settlement Framework'. We maintain there is no cogent or compelling planning reason to consider Burry Port and Pembrey as one settlement. The apparent lack of detailed investigation into the relation between the two settlements undermines the coherence of draft Policy SP2. If this matter is not addressed, then there is a risk that subsequent iterations of the Plan will propose housing allocations at Pembrey, in locations which will necessitate the use of private vehicles and fail to contribute to sustainable development.

Response / Recommendation

Disagree. The spatial proximity of Burry Port and Pembrey within this costal location indicates a logical grouping of these settlements moving forward within the Llanelli cluster. It is important to note that in allocating sites for development in the Revised LDP, the forthcoming site assessment methodology will stress that the avoidance of inappropriate coalescence.

Representation(s)		*Nature*
1082	**Cai Parry [822]**	**Object**

Summary:

The wording of the Settlement Framework should be amended to reflect Bryn's status as part of the settlement boundary of Llanelli, which is defined as a 'Principal Centre' within the top tier of the Settlement Framework.

Change To Plan Sought:

The Tier 1 settlement within Cluster 2 should be defined as 'Llanelli / Bryn'.

Response / Recommendation

Comment noted. Bryn similarly to other areas of Llanelli, such as Furnace, Llwynhendy etc, forms part of Cluster 2 Llanelli, and development will be apportioned to such locations accordingly. Being implicit that Bryn forms part of Llanelli, it is therefore not considered necessary to include Bryn in the SP 16: Sustainable Distribution - Settlement Framework flowchart.

Representation(s)		*Nature*
1740	**Mr S Lloyd [3741]**	**Object**

Agent: JCR Planning Ltd (Richard Banks) [787]

Summary:

Heol Ddu's categorisation as a Tier 4 settlement, (with no development limits) would suggest that it is in an isolated and unsustainable location, which is simply not the case. This classification is more perplexing when compared with other settlements that have been categorised as Tier 3 settlements which have a comparable or lower sustainable status than Heol Ddu when considering accessibility to community facilities and local services.

Heol Ddu can readily be considered as being a functioning part of the Ammanford/Cross Hands Tier 1 Principal Centre (Cluster 3), given its close physical proximity to Ammanford and adequate linking highway network.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s) — *Nature*

1742 **Mr M Thomas [3749]** — **Object**

Agent: JCR Planning Ltd (Richard Banks) [787]

Summary:

Having considered the various Tiers of the Settlement Framework, Pontantwn has been incorrectly categorised and should not be classed as a Tier 4 settlement. The settlement is located on a key transport corridor and forms one of a number of villages that serve the wider rural community between Carmarthen and Pontyates - a significantly sized area

Its classification as a Tier 4 settlement will result in it being unable to make a diverse contribution to the housing need of the local community, by virtue of the fact that the Preferred Strategy will not include development limits for settlements within this Tier

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s) — *Nature*

1746 **Mr M Thomas [3749]** — **Object**

Agent: JCR Planning Ltd (Richard Banks) [787]

Summary:

It is considered that Cross Inn has been incorrectly categorised and should not be classed as a Tier 4 settlement. The settlement is located on a key transport corridor and forms one of a number of villages that serve the wider rural community between St. Clears and Laugharne.

Cross Inn is served by public transport, its classification as a Tier 4 settlement will result in it being unable to make a diverse contribution to the housing need of the local community, by virtue of the fact that the PS will not include development limits for settlements within this Tier.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
1774	**Savills (Mr Nick Heard) [3216]**	**Object**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

In the Adopted LDP a four tier settlement hierarchy is in place consisting of three 'Growth Areas', six 'Service Centres', 11 'Local Service Centres', as well as a large number of 'Sustainable Communities'. St Clears, which includes Pwll Trap, is designated as a 'Service Centre', a tier which is expected to deliver 10% of housing allocations, and 9% of the total housing requirement.

The approach that is proposed in Strategic Policy SP16 in the RLDP differs substantially, consisting of three 'Principal Centres', 18 'Service Centres', and a larger amount of both 'Sustainable Villages' and 'Rural Villages'. St Clears continues to be a 'Service Centre' a tier which is to accommodate between 10% and 20% of housing need.

Despite tripling the number of Service Centres, the amount of growth which is to be directed to them is, at most, to be doubled. From a purely mathematical perspective it is suggested that this percentage is too low.

In terms of the distribution of growth, The Williams Family suggest that fundamentally the Revised LDP needs to tackle issues relating to delivery and therefore a Spatial Option needs to be taken which recognises the rates of delivery of sites within settlements.

Response / Recommendation

Comment Noted - Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. Consideration will be given to those sites which have failed to deliver in the adopted LDP. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP

Representation(s)		*Nature*
1775	**Savills (Mr Nick Heard) [3216]**	**Object**

Agent: Savills (Mr Nick Heard) [3216]

Summary:

Suitability of St Clears to accommodate further growth as a Service Centre. As discussed previously, the settlement is one of just six Service Centres which were included within the tier in the Adopted LDP, has delivered the largest number and highest percentage of units out of all of the Adopted LDP Service Centres demonstrating its ability to accommodate growth, has a broad range of services, and is strategically located at the junction of the A40 and the A477.

In terms of the distribution of growth, The Williams Family suggest that fundamentally the Revised LDP needs to tackle issues relating to delivery and therefore a Spatial Option needs to be taken which recognises the rates of delivery of sites within settlements.

Response / Recommendation

Comments Noted - Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. Consideration will be given to those sites which have failed to deliver in the adopted LDP. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.

Representation(s)		*Nature*
270	**JCR Planning Ltd (Mr Jason Evans) [2988]**	**Object**

Agent: JCR Planning Ltd (Mr Jason Evans) [2988]

Summary:

We object on behalf of our Clients to the categorisation of Felindre (Llangadog) as a Tier 4 settlement.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
216	**JCR Planning Ltd (Mr Jason Evans) [2988]**	**Object**

Agent: JCR Planning Ltd (Mr Jason Evans) [2988]

Summary:

We object to the Settlement Framework in terms of the settlement of Llansadwrn.

Response / Recommendation

Noted. The Revised LDP will be prepared in accordance with the provisions of PPW Ed. 10 and the councils Site Selection methodology. The reference to the candidate sites by the respondent is not a matter for consideration within the Draft preferred Strategy. Rather this will be considered as part of the preparation of the Deposit Plan.

Representation(s)		*Nature*
218	**JCR Planning Ltd (Mr Jason Evans) [2988]**	**Object**

Agent: JCR Planning Ltd (Mr Jason Evans) [2988]

Summary:

We object on behalf of our Clients to the classification of Milo as a Tier 4 settlement.

Response / Recommendation

Noted. The Revised LDP will be prepared in accordance with the provisions of PPW Ed. 10 and the councils Site Selection methodology. The reference to the candidate sites by the respondent is not a matter for consideration within the Draft preferred Strategy. Rather this will be considered as part of the preparation of the Deposit Plan.

Representation(s)		*Nature*
269	**JCR Planning Ltd (Mr Jason Evans) [2988]**	**Object**

Agent: JCR Planning Ltd (Mr Jason Evans) [2988]

Summary:

We object on behalf of our Clients to the classification of Felingwm Isaf as a Tier 4 settlement.

Response / Recommendation

Noted. The Revised LDP will be prepared in accordance with the provisions of PPW Ed. 10 and the councils Site Selection methodology. The reference to the candidate sites by the respondent is not a matter for consideration within the Draft preferred Strategy. Rather this will be considered as part of the preparation of the Deposit Plan.

Representation(s)		*Nature*
217	**JCR Planning Ltd (Mr Jason Evans) [2988]**	**Object**

Agent: JCR Planning Ltd (Mr Jason Evans) [2988]

Summary:

We object on behalf of our Client to the categorisation of Whitemill as a Tier 4 settlement.

Response / Recommendation

Noted. The Revised LDP will be prepared in accordance with the provisions of PPW Ed. 10 and the councils Site Selection methodology. The reference to the candidate sites by the respondent is not a matter for consideration within the Draft preferred Strategy. Rather this will be considered as part of the preparation of the Deposit Plan.

Representation(s)		*Nature*
550	**JCR Planning Ltd (Mr Jason Evans) [2988]**	**Object**

Agent: JCR Planning Ltd (Mr Jason Evans) [2988]

Summary:

We object on behalf of our Clients to the classification of Pontantwn as a Tier 4 settlement for the following reasons:
- it is located on a key transport corridor and forms one of a number of villages that serve the wider rural community between Carmarthen and Pontyates;
- it is served by a regular form of public transport,
- its classification as a Tier 4 settlement will result in it being unable to make a diverse contribution to the housing need of the local community, as it will not have development limits.
- comparable settlements in the County that have been categorised as Tier 3 settlements (such as Capel Dewi, Pentrecwrt, Rhydcymerau and Cwmdu) and yet have a comparable or lower sustainable status.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
286	**JCR Planning Ltd (Mr Jason Evans) [2988]**	**Object**

Agent: JCR Planning Ltd (Mr Jason Evans) [2988]

Summary:

We object on behalf of our Clients to the classification of Manordeilo as a Tier 4 settlement:
- it is at a sustainable location, located on the Strategic Highway Network, providing it with easy access to nearby settlements with their wide range of community facilities and local services.
- it is served by a regular form of public transport,
- its classification as a Tier 4 settlement will result in it being unable to make a diverse contribution to the housing need of the local community, as it will not have development limits.
- comparable settlements in the County that have been categorised as Tier 3 settlements (such as Capel Dewi, Pentrecwrt, Rhydcymerau and Cwmdu) and yet have a comparable or lower sustainable status than Pontantwn when considering its level of accessibility to the range of community facilities and local services nearby.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
1560	**JCR Planning Ltd (Richard Banks) [787]**	**Object**

Summary:

Object to the proposed settlement framework and request that it be amended to categorise Milo as a Tier 3 settlement

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
1557	**JCR Planning Ltd (Richard Banks) [787]**	**Object**

Summary:

Object to the proposed settlement framework and request that it be amended to categorise Mynyddcerrig as a Tier 3 settlement.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
1558	**JCR Planning Ltd (Richard Banks) [787]**	**Object**

Summary:

Object to the proposed settlement framework and request that it be amended to categorise Capel Seion as a Tier 3 settlement.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
1562	**JCR Planning Ltd (Richard Banks) [787]**	**Object**

Summary:

Object to the proposed settlement framework and request that it be amended to categorise Waunystrad Meurig as a Tier 3 settlement.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
1554	**JCR Planning Ltd (Richard Banks) [787]**	**Object**

Summary:

Object to the proposed settlement framework and request that it be amended to categorise Heol Ddu as a Tier 3 settlement.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
566	**JCR Planning Ltd (Mr Jason Evans) [2988]**	**Object**

Agent: JCR Planning Ltd (Mr Jason Evans) [2988]

Summary:

We have been instructed by our Clients to object to the classification of Penybanc as a Tier 4 settlement, it should be classified as a Tier 3 settlement for the following reasons:
- it is intrinsically linked to the larger nearby town of
Llandeilo (Tier 2);
- it is well served by public transport, and well positioned to the County's Strategic Highway Network;
- Llandeilo faces a range of physical constraints with respect to its future growth, Penybanc plays a similar role in terms of facilitating the growth of the
Town as Rhosmaen and Ffairfach.

Penybanc is sustainable from an
accessibility and transportation perspective.

Previous development plans have provided limited (if any)
opportunities for growth within Penybanc, as a result, the area has had its growth somewhat stifled, resulting in the use of community facilities and local
services declining, and in some cases closing. This trend must be halted and its proportionate growth facilitated.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
1564	**JCR Planning Ltd (Richard Banks) [787]**	**Object**

Summary:

Object to the proposed settlement framework and request that it be amended to categorise Four Roads as a Tier 3 settlement. We trust that this objection will be given full consideration by the Authority.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
259	**JCR Planning Ltd (Mr Jason Evans) [2988]**	**Object**

Agent: JCR Planning Ltd (Mr Jason Evans) [2988]

Summary:

We object on behalf of our Clients to the categorisation of Pentregwenlais Road as being part of the settlement of Pentregwenlais and not Llandybie. This area should form part of Llandybie for the following reasons:
- it forms part of the ward of Llandybie;
- it is a continuation of, and is attached to Llandybie;
- it lies on one of the key access routes serving the County;
- it is within walking distance of all of the key local services and community facilities.

Concern is raised that if the area remains within Pentregwenlais, it will form part of a Tier 4 and not Tier 1 settlement and will not benefit from defined development limits.

Response / Recommendation

Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.
This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

Representation(s)		*Nature*
26	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

We support the principles that underline the SP16 - Sustainable Distribution - Settlement Framework and in particular like that "the principal centres will be the main focus of growth, with its precise spread across the County being responsive and not constrained by a rigid proportional distribution."

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
2042	**Persimmon Homes West Wales (Mrs Kate Harrison) [3410]**	**Support**

Summary:

SP16 'Sustainable Distribution - Settlement Framework' directs the provision of growth and development to sustainable locations. This takes a 4 tiered approach in terms of the settlement framework. These include the principal centres, the service centres, sustainable villages and rural villages. The principal centres remain as Carmarthen, Llanelli and Ammanford/Cross Hands, which includes Gorslas, where the majority of development will be directed. Fforest/Hendy is defined as a Service Centre in Cluster 2 where 15-20% of development will be directed. We support the provision of Housing Allocations in Principal Centres and Service Centres

Response / Recommendation

support welcomed.

Representation(s)		*Nature*
545	**RSAI [3167]**	**Support**

Agent: Lichfields (Mr Arwel Evans) [3166]

Summary:

Support the categorisation of Llangennech as a Tier 2 Service Centre within Cluster 2. We consider that this is appropriate due to the wide variety of facilities and services within the settlement.

Consider that our client's site is sustainably located with regards to the facilities and services of Llangennech and therefore ideally placed to come forward as a housing allocation.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
2024	**Swallow Investments Limited [3995]**	**Support**

Summary:

Strategic Policy SP16 sets out the County's Settlement Framework, based upon a four Tier Settlement Hierarchy and with the County divided into six Settlement Clusters. My client supports Strategic Policy SP16, in particular the designation of Ammanford /Crosshands as a Tier 1 Principal Centre at the top of the Settlement Hierarchy in the County's Settlement Cluster 3. In this respect, Ammanford /Crosshands is an highly sustainable location to which new housing and employment development should be directed; and it is entirely appropriate for the settlement to be positioned at the top of the County's Settlement Hierarchy.

Response / Recommendation

Support welcomed.

Paragraph 11.137

Representation(s)		*Nature*
546	**RSAI [3167]**	**Support**

Agent: Lichfields (Mr Arwel Evans) [3166]

Summary:

We support paragraph 11.137 which states that the Plan will seek to distribute growth and development across the County having regard to the spatial strategy and spatial framework and national policy. We support the fact that the Plan will have regard to the role and function of settlements.

We consider that the spatial framework identified provides a sound basis for delivering sustainable development in areas which also present employment opportunities (such as Llangennech). This would ensure that housing and employment uses co-exist meaning that jobs can be easily reached by sustainable forms of transport such as walking and cycling.

Response / Recommendation

Support welcomed.

Paragraph 11.138

Representation(s)		*Nature*
1758	**City & County of Swansea (Mr Tom Evans) [3761]**	**Comment**

Summary:

Section 5: Consideration of other strategies -The reference in the detailed section of the report to the cross boundary role and function of some settlements is welcomed. However, we suggest that the evidence base could usefully be strengthened by consideration of how the spatial strategies and settlement hierarchies of neighbouring plan areas will affect the role and function of settlements.
Para 6.57 of the Topic paper relating to the role of Hendy/Forest (Cluster 2) makes a welcome reference to the Swansea LDP Strategic Site allocation at SD A: Land at Pontarddulais and the need to consider the cross border implications on housing numbers as part of the revised LDP. The Topic Paper could be usefully strengthened by way of reference to the cross boundary role of settlements, particularly within the wider region. For example, consideration of commuting and shopping trip patterns.

Response / Recommendation

Comments noted / welcomed. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. Reference is made to the Role and Function Topic Paper which will evolve as the plan making process proceeds towards deposit.

Paragraph 11.140

Representation(s)		*Nature*
2025	**Swallow Investments Limited [3995]**	**Support**

Summary:

The respondent supports paragraphs 11.140 and 11.141 of the LDP, in that they confirm that the Principal Centres will be the main focus of growth over the LDP period, accommodating between 50-55% of the County's new housing growth

Response / Recommendation

Support Welcomed

Paragraph 11.141

Representation(s)

1634 **Welsh Government (Mr Mark Newey) [13]**

Nature

Comment

Summary:

The WG does not have significant concerns with the ethos and objectives of what the Preferred Strategy is seeking to achieve, nor the approach to Clusters within the settlement hierarchy. However, the Welsh Government is concerned that the proposed distribution of housing growth, particularly within settlement Tiers 3 and 4, raises sustainability issues based on the role and function of places. Acknowledging the rural characteristics of Carmarthenshire, the scale and distribution of growth at Tier 3 & 4 settlements does not align with the principles of sustainable development, PPW or the Council's own evidence (Sustainability Appraisal and the Role and Function of Settlements Paper) and has the potential to have an adverse impact on the Welsh language.

Response / Recommendation

Noted. The scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP - including the proportions allocated to the respective tiers within the hierarchy.

Representation(s)

1083 **Cai Parry [822]**

Nature

Object

Summary:

The indicative apportionment directs too much growth to the less sustainable settlements. PPW states that development should reduce reliance upon the private car.

Change To Plan Sought:

The indicative apportionment should be amended such that it directs a greater proportion of development to the top tiers of the Settlement Framework. A suggested apportionment is set out below:

* Principal Centre - 60%;
* Service Centre - 20%;
* Sustainable Villages - 15%;
* Rural Villages - 5%;
* Non-Defined Rural Settlements - <1%.

Response / Recommendation

Comments Noted. The Council considers that the indicative apportionment of residential growth by tier is based on a sound and reasonable assessment, by identifying a number of factors which influence it. However, the indicative apportionment affords an allowance in to be made; the level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.

Representation(s)

547 **RSAI [3167]**

Nature

Object

Agent: Lichfields (Mr Arwel Evans) [3166]

Summary:

A robust evidence base is required before the apportionment of growth in each tier is confirmed.

Change To Plan Sought:

The apportionment of dwellings in the hierarchy should not be prejudged before carrying out a thorough assessment of the sustainability, suitability and deliverability of the candidate sites

Response / Recommendation

Comments Noted. The Council as part of the LDP process are reviewing all existing housing allocations sites to identify those that are not contributing to the LDP strategy, and a wide ranging assessment is being undertaken to make sure that the most appropriate sites are allocated in the revised Plan. This will be reflected within the apportionment of sites within each cluster and tier.

Representation(s) | *Nature*

2104 **Union Tavern Estate [3913]** | **Support**

Agent: Barton Willmore (Joe Ayoubkhani) [646]

Summary:

We support the indicative apportionment of residential growth by tiers - outlined in Paragraph 11.141 as being:
* Principal Centre 50 - 55%;
* Service Centre 15 - 20%;
* Sustainable Villages 15 - 20%;
* Rural Villages 15- 20%; and
* Non-Defined Rural Settlements < 1%.
Gorlas is identified within the Settlement Framework as part of the Tier 1 Principal Centre Cluster of Ammanford/Crosshands. Whilst no explicit amendments are required within the Preferred Strategy, it should be noted that Gorslas has a range of facilities and services and there are proposals for a new Welsh-medium school to be located within the village.

The settlement moreover has a close functional relationship with Cross Hands, which includes a further range of facilities and employment opportunities. The Strategic Spatial Options and Settlement Hierarchy Topic Paper to the LDP (Revised June 2013) identified that Gorslas formed part of the Ammanford/Cross Hands settlement grouping which scored the highest points score (of 49 points) when considering access to facilities and services.

Response / Recommendation

Support Welcomed

Paragraph 11.145

Representation(s) | *Nature*

1057 **JCR Planning Ltd (Mr Jason Evans) [2988]** | **Object**

Agent: JCR Planning Ltd (Mr Jason Evans) [2988]

Summary:

We submit a holding objection to Policy 16 until further detail on the criteria to be used in relation to growth in Rural Villages is published.

Change To Plan Sought:

To be confirmed.

Response / Recommendation

Comment noted. The Council will seek to address the content and criteria of the Policy within the Deposit LDP.

Representation(s) | *Nature*

548 **RSAI [3167]** | **Support**

Agent: Lichfields (Mr Arwel Evans) [3166]

Summary:

We agree that the Service Settlements are appropriate areas in principle to accommodate housing allocations (paragraph 11.145).

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

2026 **Swallow Investments Limited [3995]** | **Support**

Summary:

The respondent supports paragraph 11.145 of the LDP, in that it confirms Housing Allocations (defined in paragraph 11.35 of the LDP as sites capable of accommodating 5 dwellings and above) will be directed to the County's Principal Centres.

Response / Recommendation

Support Welcomed

Strategic Policy - SP17

Representation(s) | *Nature*

1751 **City & County of Swansea (Mr Tom Evans) [3761]** | **Comment**

Summary:

We welcome the opportunity to work in partnership during the Deposit preparation and particularly in relation to the need to consider the impact of Carmarthenshire's growth and spatial strategy upon the cross-boundary and wider regional highways network, which we recommend should be undertaken in consultation with Swansea traffic engineers utilising the Swansea Strategic Transport Model1. (See EB024a Strategic Transport Assessment 2015 (PDF, 7MB) and associated appendices)

Response / Recommendation

Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. . The Council fully recognises that this is a key trans-boundary issue and as such it will be given due consideration.

Representation(s) | *Nature*

1596 **mr william Phillips [3566]** | **Comment**

Summary:

It is difficult to disagree with the Strategic Policy (SP17). It is the implementation of the Policy that is lamentable. In the Bryn & Bynea areas of Llanelli the transport infrastructure is very deficient, with over 200 homes, from the previous LDP,. yet to be completed. Traffic congestion is bad and getting worse, on the M4, through Llangennech to Bryn, with traffic to and from Loughor bridge - Llanelli providing additional congestion to Station Road, Bynea and to Bryn and Llangennech.
Forward Planning should not be duped by the fanciful reports from the Agents of prospective Developers.

Response / Recommendation

Support welcomed for SP17. In relation to the comments with regards to highway capacity, the deposit LDP will need to be supported by robust evidence - including on the area's infrastructural capacity.

Representation(s) | *Nature*

27 **Carmarthenshire County Council (Mr Stuart Walters) [2345]** | **Support**

Summary:

SP17 - Transport & Accessibility - We support the principles contained with this policy, and welcome the recognition that the county is different in terms of transport requirements in particular that the rural areas are likely to be dependent on the car and this needs to be recognised during the plan period. We also support the promotion of the county as a centre for cycling for Wales and its importance as a future economic driver.

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

1084 **Cai Parry [822]** | **Support**

Summary:

Planning Policy Wales (Edition 10, p. 18) seeks to ensure that the planning system contributes to the long-term economic well-being of Wales, by making use of existing infrastructure and facilities. Moreover, paragraph 3.38 states that "an important consideration will be minimising the need to travel, reducing the reliance on the private car and increasing walking, cycling and use of public transport". Accordingly, we consider that Strategic Policy SP 17 complies with Planning Policy Wales and therefore the wording is strongly supported by BDW Homes.

Response / Recommendation

Support Welcomed.

Strategic Policy - SP18

Representation(s) | *Nature*

1650 **Welsh Government (Mr Mark Newey) [13]** | **Comment**

Summary:

The Deposit Plan should reference the landbank requirements set out in the Regional Technical Statement (RTS) and state how the LDP will satisfy these. We do not agree with the statement in paragraph 11.155 that "the County's landbank figures, for both hard rock and sand and gravel, are notably in excess of the minimum requirements set out in MTAN 1, and consequently there is no requirement to allocated new sites for mineral development". The RTS (endorsed 2014) states there is an under provision of 2.94mt of sand and gravel reserves within the region of Carmarthenshire, Ceredigion and Pembrokeshire (including the National Park). These authorities should work collaboratively to address the shortfall and identify specific sites.

Response / Recommendation

Noted. The Deposit LDP will set out the landbank requirements as set out in the Regional Technical Statement (RTS). The comments by the respondent in respect of para 11.155 are duly noted and will be amended as part of the Deposit LDP to reflect the requirements of the RTS. It should be noted that the Council has undertaken a 'Call for Sand and Gravel Sites' in response to this matter.

Representation(s) | *Nature*

1656 **Simon Chaffe [855]** | **Comment**

Summary:

Strategic Policy SP18: Mineral Resources

a) We propose that a reference be added to duration of the requirement for minimum landbanks for crushed rock and sand and gravel to be retained throughout the whole of the plan period, that is, 10 and 7 years respectively. To be explicit, at the end of the Plan Period there needs to be a minimum landbank of crushed rock of 10 years and for sand and gravel of 7 years.

Response / Recommendation

Noted. The Deposit LDP will set out the landbank requirements as set out in PPW and MTAN 1. The comments by the respondent in respect of Strategic policy SP 18 criterion a) are duly noted. Any necessary amendments to policy wording will be carried out as part of the Deposit LDP to reflect the requirements of national planning policy.

Representation(s)		*Nature*
1659	**Simon Chaffe [855]**	**Comment**

Summary:

d) Buffer Zones should not be applied prescriptively by arbitrary distances but judged on a 'case by case' basis.

Response / Recommendation

Noted. The comments by the respondent in respect of Strategic Policy SP 18 criterion d) are duly noted. The Deposit LDP will set out appropriate buffer zones around extant mineral sites in accordance with the requirements set out within Planning Policy Wales (PPW) Ed.10 and the MTANs.

Representation(s)		*Nature*
1658	**Simon Chaffe [855]**	**Comment**

Summary:

c) Please clarify how, and at what stage in the plan making process, Safeguarding Areas would be defined. These Areas need to apply not only to the mineral resource but also the wider areas that may be affected.

Response / Recommendation

In response to the respondent's query regarding safeguarding areas, such areas will be defined as part of the preparation of the Deposit LDP, and will utilise the British Geological Survey's (BGS) Aggregates Safeguarding Map for South West Wales (which identify more specific areas than those contained within the BGS Mineral Resource Maps). The safeguarding areas will be defined on the LDP Proposals Map and the Written Statement will contain the written policy.

Representation(s)		*Nature*
2314	**The Coal Authority (Melanie Lindsley) [4000]**	**Comment**

Summary:

As you will be aware the Carmarthenshire area has significant coal mining legacy. The Coal Authority provides the LPA with downloadable data in respect of Development Risk and Surface Coal Resource plans. We would expect any sites being considered for allocation within the plan to be assessed against this information. This is to ensure that any issue or potential constraints, identified in respect of the quantum of development which can be accommodated on a site is identified at as early a stage as possible.

Response / Recommendation

Comment noted.

Representation(s)		*Nature*
1781	**Mineral Products Association Wales (Mr Nick Horsley) [3778]**	**Object**

Summary:

In order to provide consistency with PPW and MTAN1 and for greater clarity we suggest modifying the wording of a) by changing "hard rock" to "crushed rock". Further it would be prudent to clarify the landbank requirements by adding the following wording to point a) A minimum ten-year landbank of crushed rock and minimum seven-year landbank for sand and gravel should therefore be maintained during the entire plan period.

Change To Plan Sought:

The amended text would read:- "Ensuring supply by maintaining an adequate landbank of permitted aggregate reserves (hard crushed rock and sand and gravel) throughout the Plan period. A minimum ten-year landbank of crushed rock and minimum seven-year landbank for sand and gravel should therefore be maintained during the entire plan period".

Response / Recommendation

Noted. The Deposit LDP will set out the landbank requirements as set out in PPW, MTAN 1. The comments by the respondent in respect of Strategic policy SP 18 criterion a) are duly noted. Any necessary amendments to policy wording will be carried out as part of the Deposit LDP to reflect the requirements of national planning policy.

Representation(s)		*Nature*
1780	**Mineral Products Association Wales (Mr Nick Horsley) [3778]**	**Object**

Summary:

Reference is made to mineral resources; however, the policy appears only to address aggregates. The SWRAWP annual monitoring report refers to non-aggregate mineral resources in Carmarthenshire. These should be reflected in the policy.

Change To Plan Sought:

Amend accordingly.

Response / Recommendation

Noted. The comments by the respondent in respect of Strategic Policy SP 18 are duly noted. Any necessary amendments to wording will be considered as part of the preparation of the Deposit LDP, to ensure that it accords with PPW and the MTANs.

Representation(s)		*Nature*
1782	**Mineral Products Association Wales (Mr Nick Horsley) [3778]**	**Object**

Summary:

It should be made clear that sterilisation of a mineral resource may be as a result of the proximity of development not just by development directly upon a resource. The policy is not clear as to how the safeguarding areas will be identified within the LDP, it is assumed by the use of mineral safeguarding maps. We would be happy to discuss the resources to be safeguarded with the Council.

Change To Plan Sought:

Amend the text to read "Safeguarding areas underlain by minerals of economic importance where they could be worked in future to ensure that such resources are not unnecessarily sterilized by other forms of development either directly or within close proximity to the safeguarded resource. Minerals safeguarding maps will be included within the LDP".

Response / Recommendation

Noted. The comments by the respondent in respect of mineral safeguarding (within Strategic Policy SP 18) are duly noted. Detailed policy matters concerning mineral safeguarding (including the respondent's suggested wording) will be addressed during preparation of the Deposit LDP, to ensure that it accords with the requirements set out within PPW and the MTANs.

Representation(s)		*Nature*
1784	**Mineral Products Association Wales (Mr Nick Horsley) [3778]**	**Object**

Summary:

It would be helpful to clarify how the buffer zones will be applied. Buffer zones provide areas of protection around permitted and proposed mineral workings where new development which would be sensitive to adverse impact, including residential areas, hospitals and schools, should be resisted.

Change To Plan Sought:

Amend the text to read "The use of Buffer Zones to reduce the conflict between mineral development and sensitive development. These Buffer Zones will provide areas of protection around permitted and proposed mineral workings where new development which would be sensitive to adverse impact, including residential areas, hospitals and schools, should be resisted."

Response / Recommendation

Noted. The comments by the respondent in respect of mineral buffer zones (within Strategic Policy SP 18) are duly noted. Detailed policy matters concerning the use of buffer zones (including the respondent's suggested wording) will be addressed during preparation of the Deposit LDP, to ensure that it accords with the requirements set out within PPW and the MTANs.

Representation(s)		*Nature*
28	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

SP18 - Mineral Resources - policy noted.

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1710	**Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**	**Support**

Summary:

Support the compatibility of approach between the Plans.
The terrestrial sand and gravel landbank and apportionment of provision to meet future needs is considered on a regional basis.

The regional landbank for sand and gravel is rather limited compared with that available for hard rock. Sand and gravel production in the region are of limited capacity.

New terrestrial production sites within the region but outside the Park are needed.

Carmarthenshire's landbank figures for hard rock and sand and gravel are in excess of the minimum requirements set out in MTAN1, therefore there is no requirement to allocate new mineral sites.

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

1657 **Simon Chaffe [855]** | **Support**

Summary:

(b) SUPPORT
'Encouraging the efficient and appropriate use of high quality minerals and maximising the potential for the re-use and recycling of suitable minerals as an alternative to primary won aggregates;'

Response / Recommendation

Support welcomed.

Representation(s) | *Nature*

1020 **The Coal Authority (Mr Christopher Telford) [2376]** | **Support**

Summary:

The Coal Authority supports the inclusion of this policy.

Response / Recommendation

Support welcome.

Paragraph 11.153

Representation(s) | *Nature*

1660 **Simon Chaffe [855]** | **Comment**

Summary:

Amendment to the paragraph to read
..the County protects mineral resources and provides mineral reserves...'

There should be opportunities for extensions to existing operational quarries with limited permitted mineral reserves where landbanks are in excess of the minimum periods. There can be a reluctance on the part of MPA to grant PP that would have the effect of extending them significantly. However, granting such PP may safeguard mineral resources from sterilisation, secure their prudent use and facilitate the management and protection of existing amenity and the environment. We believe that these circumstances should be explicitly recognised in the Preferred Strategy.

Response / Recommendation

Noted. The comments by the respondent in respect of Paragraph 11.153 are duly noted. The wording of policies and supporting text will be addressed during production of the Deposit LDP, to ensure that they are in accordance with national planning policy.

Representation(s) | *Nature*

1786 **Mineral Products Association Wales (Mr Nick Horsley) [3778]** | **Object**

Summary:

We would suggest use of the word "reserves" rather than "resources" as reserves are resources with planning permission which can readily be worked.

Change To Plan Sought:

Amend the text to read "The LDP should ensure that the County provides mineral resources reserves to meet society's needs...."

Response / Recommendation

Noted. The comments by the respondent in respect of Strategic Policy SP 18 are duly noted. Any necessary amendments to wording will be considered as part of the preparation of the Deposit LDP, to ensure that it accords with PPW and the MTANs.

Paragraph 11.155

Representation(s)		*Nature*
1787	**Mineral Products Association Wales (Mr Nick Horsley) [3778]**	**Object**

Summary:

As mentioned above, reference to "hard rock" should be amended to "crushed rock" for consistency. As also referred to above the RTS is a document of influence to the plan. The RTS is currently under formal review by Welsh Government with the 2nd review anticipated for completion by Q1, 2020. This review will run in parallel to the revised Preferred Strategy for the LDP and is therefore a material consideration. It is also notable that Carmarthenshire has the third highest housing projection in adopted LDPs. Whilst housing numbers may well be amended under the revised LDP, there is a recognition that historic sales of aggregates may not be the appropriate methodology to predict future aggregate requirements, in light of growth aspirations. Low production tonnages coupled with healthy reserves create long landbanks. The SWRAWP AMR states that "care must be exercised in relying on the landbank figures for ..... Carmarthenshire as these are based on very small annual sales from relatively small sites." Sales alone may not represent a true reflection of aggregate usage within an area. Further, the current consultation is coupled with a call for candidate Sand and Gravel Sites. The final sentence should therefore be amended.

Change To Plan Sought:

The text should be amended to read "The South Wales RTS 2014 sets out the contribution that each constituent local authority should make towards meeting the regional demand for aggregates (both hard crushed rock and sand and gravel). He LDP's second Annual Monitoring Report (AMR 2016/17) establishes that the County's landbank figures, for both hard crushed rock and sand and gravel, is notably in excess of the minimum requirements set out in MTAN1: Aggregates, and consequently there is no requirement the need to allocate new sites for minerals development will be considered in line with the requirements of the developing RTS and the current call for sites."

Response / Recommendation

Noted. The comments by the respondent in respect of Strategic Policy SP 18 are duly noted. Any necessary amendments to wording will be considered as part of the preparation of the Deposit LDP. Such amendments will ensure that it accords with PPW, the MTANs and acknowledges the authority contributions towards meeting the regional demand for aggregates set out within the RTS.

Representation(s)		*Nature*
1661	**Simon Chaffe [855]**	**Object**

Summary:

RTS 2014 Appx B pp27 (Carmarthenshire) states,
'To address the resulting sand & gravel shortfall, new allocations totalling at least 2.94 million tonnes will need to be identified within the LDPs of one or more of the four authorities over which the apportionment is shared.'

This RTS is currently being reviewed by Welsh Government with completion expected early next year.

The reference in the final sentence to there being no requirement to allocate new sites for mineral development is at odds with the above and the Sand & Gravel Call for Sites. This whole paragraph should therefore be redrafted.

Response / Recommendation

Noted. The comments by the respondent in respect of paragraph 11.155 are duly noted. The Deposit LDP will set out the landbank requirements in accordance with the Regional Technical Statement (RTS), and any necessary amendments to wording will be made as part of the Deposit LDP.

Strategic Policy - SP19

Representation(s)		*Nature*
1662	**Simon Chaffe [855]**	**Comment**

Summary:

a) We propose that this part be re-drafted as follows:
'The allocation of additional adequate appropriate land to provide, in association with existing waste management facilities*, for an integrated network of waste management facilities.'

* These to be defined in an appendix as in Appendix 6 of the LDP (adopted 2014) and, for the avoidance of doubt, to include New Lodge, Cwmgwili.

Response / Recommendation

Noted. The comments by the respondent in respect of Strategic Policy SP 19 criterion a) are duly noted. The wording of this policy and its supporting text will be addressed during production of the Deposit LDP, to ensure that they are in accordance with national planning policy.

Representation(s)		*Nature*
29	**Carmarthenshire County Council (Mr Stuart Walters) [2345]**	**Support**

Summary:

Waste Management - policies noted.

Response / Recommendation

Comments noted.

Representation(s)		*Nature*
1711	**Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**	**Support**

Summary:

Both authorities' policies on waste management are broadly aligned. Carmarthenshire acknowledges TAN 21 and the need for collaboration between local planning authorities to progress towards an integrated and adequate network for waste management.

Response / Recommendation

Support Welcomed

Representation(s)		*Nature*
1663	**Simon Chaffe [855]**	**Support**

Summary:

b) SUPPORT
'Support proposals for waste management which involve the management of waste in accordance with the waste hierarchy;'

Response / Recommendation

Support welcomed.

Representation(s)		*Nature*
1664	**Simon Chaffe [855]**	**Support**

Summary:

(c) SUPPORT
'Acknowledging that certain types of waste facility may need to be located outside the development limits of settlements;'

Response / Recommendation

Support welcomed.

Appendix 3b

County Council Minutes (15 May 2019)

COUNTY COUNCIL MINUTES
WEDNESDAY, 15 MAY 2019

10. EXECUTIVE BOARD RECOMMENDATION - REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN 2018 - 2033 DRAFT PRE-DEPOSIT PREFERRED STRATEGY

Council was informed that the Executive Board, at its meeting held on the 7th May 2019, had considered a report on the Revised Carmarthenshire Local Development Plan 2018-2033 Draft Pre-Deposit Preferred Strategy, produced in response to the Council's decision on the 10th January, 2018 to commence preparation works on the revised plan. This represented an important milestone in the Council delivering on its statutory responsibilities to prepare an up-to-date plan for the County (excluding the area falling within the Brecon Beacons National Park Authority). It was noted that the report contained 344 representations received in response to the public consultation exercise undertaken between the 12th December, 2018 and the 8th February, 2018.

Views were expressed on the need to ensure that transport infrastructure and climate change concerns were addressed and underpinned new developments. It was also commented that the new LDP would hopefully permit small housing developments in rural areas and the conversion of old rural buildings into economic hubs.

RESOLVED that the following recommendations of the Executive Board be adopted: 'THAT

10.1 the representations received in respect of the Draft Pre-Deposit Preferred Strategy be noted and the recommendations ratified;

10.2 the representations received in respect of the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Initial Report, Habitat Regulations Assessment (HRA) Screening Report and the LDP Review Report be noted and the recommendations ratified;

10.3 delegated authority be granted to officers to:-

- **amend the Preferred Strategy in light of the recommendations emerging from the SA/SEA, HRA process and emerging evidence as part of the preparation of the Deposit LDP;**
- **make non substantive typographical or factual amendments as necessary to improve the clarity and accuracy of the Delivery Agreement.'**

Appendix 4

Habitats Regulations Assessment (HRA) Screening Report responses

Appendix 4: Habitat Regulation Assessment Screening Report - Representations Received

Please Note: Text provided in red is text that has been added in response to the comments provided in this report.	
Organisation/Comment	**Response/Action**
Natural Resources Wales – Sharon Luke	
General Comments	
Reference is made to 2010 Regulations throughout the report this requires updating to The Conservation of Habitats and Species Regulations 2017.	Noted and amended throughout document.
Table 1 Habitats Regulation Assessment: Key Stages	
• Under Purpose for Appropriate Assessment we would include the precautionary principal and that the plan will not adversely affect the integrity of the sites.	Agreed. Wording amended to read: To ensure that the plan will not adversely affect the integrity of sites. Consideration of impacts on integrity of the site, either individually or in combination with other plans and projects, having regard to the site's structure, function and conservation objectives, whilst applying the precautionary principle. Where adverse impacts are identified or remain unknown, assess mitigation options to identify impacts on the integrity of the site. This stage should involve consultation. If mitigation options do not result in avoidance of adverse effects permission can only be granted if the remaining 2 stages are followed.
1.3.1. We acknowledge that the HRA for the site-specific allocations will be carried out as part of the drawing up of the Deposit LDP.	Comments noted.
1.4.1. We advise the reference to Regulation 85B (3) is incorrect. Regulation 77 covers consultation with the relevant nature conservation body.	Amended.
2.2.1. This should refer to regulation 63 (1).	Amended.
2.3. This should refer to The Conservation of Habitats and Species Regulations 2017.	Amended throughout document.
3.1.1. Potential offsite impacts are listed here but not mentioned earlier in the report.	Wording added to Table 1. Under Screening – Purpose, to describe how the screening stage must consider the potential for offsite impacts. Table now reads:

	Process for identifying impacts of a plan or project on a European site, either individually or in combination, and consideration of whether likely effects will be significant. This will include consideration of the potential for direct, indirect and cross-boundary effects.
3.1.3 The West Wales Marine Candidate Special Area of Conservation (cSAC) should be included.	Amended. Figure 1 has also been amended to include the West Wales Marine cSAC. Appendix 1 has also been updated to include information and the conservation objectives of the West Wales Marine cSAC.
3.2.3. We would amend this to read 'features of the N2K sites'. We would also advise the inclusion of 'The Plan must not undermine the conservation objectives of the sites'.	Amended. Paragraph now reads: 3.2.3 The scanning stage identifies features of the N2K sites that may be affected by the plan as far beyond as necessary for sites and identifying causal connections and links between the plan proposals and the qualifying features of the sites. The Plan must not undermine the conservation objectives of the sites.
3.2.8 Disturbance should be included.	This paragraph simply gives examples of the types of impacts that could be caused by development and is therefore not exhaustive. Table 2. Covers disturbance in more detail.
Table 2 Scanning and site selection lists for sites that could potentially be affected by the plan	
• The Afon Tywi is not included under SAC's under Section 2.	Amended to include Afon Tywi.
• Carmarthen Bay Dunes is entitled incorrectly under Section 3.	Amended.
• West Wales Marine Candidate Site needs to be added to Section 4.	Amended to include West Wales Marine cSAC.
• We would suggest the Afon Tywi and Carmel should be included in Section 6.	Disagree. Neither the Management Plan nor Standard Data form for Afon Tywi or Cernydd Carmel reference recreation to be considered as a pressure or threat on the features of the SAC and therefore it is not included for consideration under this section.
• We seek clarification as to how all sites have been screened out of Section 7 that could be affected by provision of new or extended	Agreed. This will be amended and considered further in the deposit HRA

transport or other infrastructure. These could be barriers to migratory fish, bats and otters.	report.
• We would add Elenydd-Mallaen to Section 7 sites that could be affected by increased deposition of air pollutants. This is as the diet and nesting habits of Merlin could be impacted by air pollution.	Disagree. The management plan of Elenydd-Mallaen does not reference any sensitivity of Merlin or their prey to air quality issues in the conservation objectives or management requirements and therefore they are not included for consideration under this section.
• Section 14 included Cwm Doethie which is not the sites full name, we would remove it from here as it does not include any mobile species. Elenydd Special Protection Area (SPA) should be added.	Noted and amended. Cwm Doethie has been removed and Elenydd-Mallaen SPA has been added.
• We would expect the same sites (again taking Cwm Doethie out) to be noted under Section 15 as in 14.	Noted and amended accordingly as above.
• Section 16 – We do not agree with the conclusion that no sites require further consideration. If there is potential to disturb species as noted in Section 14 of the table then potential exists to cause mortality. We would expect the same sites to be included in both sections.	Whilst we agree that if there is potential to disturb species noted in Section 14 then there is a risk of mortality, for the purposes of this HRA, it is considered that the effects of this category will be captured effectively via Section 14 of the table. Therefore, in order to avoid duplication, sites are screened out of this section. The following worded has been added to Section 16 as clarification: Potential for mortality as a result of disturbance, however to avoid duplication this is addressed under Section 14.
• Mobile features need to be considered outside the designated site boundaries.	Mobile features outside of designated site boundaries are considered in Section 5 – Plans that could affect mobile species.
3.2.9. Effects associated with development should include effects of contaminated land run off.	The effects of contaminated land run off will be considered under Section 2 – Plans that could affect the aquatic environment. The following wording has been added to Section 2 to provide clarification: Sites upstream or downstream of the plan area in the case of river or estuary sites. Effects considered include localised effects on surface/groundwater resources and quality, resulting from changes in run-off, sedimentation, erosion etc.

Table 4, 5 and 6	
West Wales Marine Candidate SAC needs to be included.	Agreed. West Wales Candidate SAC has now been included.
Table 6 Preliminary screening of European Sites identified as vulnerable to effects on the coast.	
• Consideration should be given to whether the title to this table should be mobile species as it includes Caeau Mynydd Mawr SAC.	Agreed and amended.
• All fish species have been screened out due to water quality although this is not clear; disturbance and barriers have not been included.	Noted, however any impacts as a result of disturbance is considered separately under Section 14.
• We question if Elenydd-Mallaen should be included for bird assemblage?	Agreed, amended to include Elenydd - Mallaen
• Clarification is required as to why Lesser Horseshoe Bats have been screened out when we have records and known roosts in Carmarthenshire.	Agreed, Lesser Horseshoe Bat will be screened in on a precautionary basis.
3.2.19 This paragraph may be better placed before the screening table (6) to understand why fish species have been screened out.	Agreed, screening table now placed at the end of this section.
3.2.20 Requires updating with the new conservation objectives for the SAC.	We acknowledge receipt of the updated objectives as part of NRW's representation to the HRA Screening report and have updated the conservation objectives in Appendix 1 and have been amended in the text Paragraph now reads: The conservation objectives for Caeau Mynydd Mawr SAC were updated by NRW in 2016, to reflect more current information and understanding of the site and its features. These updated conservation objectives state that to be viable in the long term, the Marsh Fritillary metapopulation requires *'at least 100ha of available habitat, with adequate connectivity linked to the core SAC units'*. The core SAC units have a requirement to provide a minimum of 17.5ha of Available habitat towards this target, and to provide at least 6ha of good habitat within Caeau Mynydd Mawr SAC.

3.2.25 We agree detailed screening will be required as the species are known to be on the county border with Pembrokeshire in areas such as Cenarth.	Noted. This will be addressed in more detail at the detailed screening stage.
3.2.29 The distance from Carmarthenshire's border is given as 16km in this point whereas it states 6.9km in section 3.1.4. The addition of Lesser Horseshoe bats is required as there are records for Carmarthenshire, a roost (possibly maternity) was also found in the Llansteffan area during the last few years.	This has now been corrected in section 3.1.4 as the site is actually 23km outside of Carmarthenshire. Lesser Horseshoe Bats have now been screened in on a precautionary basis.
3.2.32 There is text missing from the end of this paragraph.	The 'Therefore,' to which this refers has now been deleted.
3.2.31- 3.2.36 European otters. Consideration should be given to breeding sites within this section.	Reference is made to breeding sites in this paragraph: 3.2.31 European otters are designated features of a number of European sites considered for screening within this document, including River Tywi, River Teifi, Cleddau Rivers, Carmarthenshire Bay and Estuaries, Pembrokeshire Bat Sites and Bosherton Lakes, Pembrokeshire Marine, River Wye and River Usk SACs. Management plans for all of the aforementioned sites highlight that otters 'may be affected by developments that affect resting and **breeding sites** outside of SAC boundaries'. The text has been amended to provide further clarity: **3.2.36 In light of this, detailed screening will need to be undertaken to identify any site allocations which may impact on the use of suitable areas of land used for both breeding and resting outside the SAC boundary by otters.**
3.2.37 We do not agree that neither species utilise any of the waterways. Carmarthen Bay and Estuaries and the West Wales Marine Candidate SAC lie within the plan area.	This section has been renamed: ***Bottlenose Dolphin, Grey Seal and Harbour Porpoise*** so as to include the primary features of the Bristol Channel Approaches cSAC and the resulting paragraphs have been redrafted in light of NRW's comment.
3.2.38 Consideration for the Elenydd -Mallaen SPA is required under SPA	Consideration is now given to Elenydd-Mallaen Bird Assemblages under

Bird Assemblages and its mobile features notably Red kite, Merlin and Peregrine. The SPA is noted in Table 7.	this section.
Table 7 Preliminary screening of European Sites identified as vulnerable to recreational effects.	
• The River Tywi SAC is missing from this table. We suggest there are potential pressures from increased boating/kayaking etc.	Agreed. River Tywi is screened in based on the potential for increased disturbance to Otters
• We consider that Cernydd Camel SAC should also be included as potential for increased pressure from increased visitor numbers in the reserves.	Agreed. Although recreation is not listed as a threat on the Natura 2000 standard data form or the site's management plan, due to the proximity of Cernydd Carmel SAC to existing settlement limits and to the Crosshands growth area, it is screened in on a precautionary basis.
3.2.56 Refers to the Environment Agency, this should read NRW.	Amended.
3.2.59 Acronym for NRW is used in this section although NRW used before hand in the document.	Amended.
Table 9 Preliminary screening of European Sites identified as vulnerable to effects on water quality.	
• Carmarthen Bay Dunes SAC to be added due to slack habitat and petalwort features.	Amended to include Carmarthen Bay Dunes SAC. Table 2 has also been amended to reflect this.
3.2.68 Consideration needs to be given to mobile species such as bats and otters for sites outside Carmarthenshire's boundary.	Agreed. Pembrokeshire Bat Sites and Bosherston Lakes SAC screened in.
Table 11 Preliminary screening of European Sites identified as vulnerable to effects of disturbance, noise and light pollution effects.	
Cwm Doethie- Mynydd Mallaen SAC has no mobile species features listed so may be able to be screened out.	Amended. Cwm Doethie – Mynydd Mallaen SAC now screened out of this section.
Elenydd Mallaen SPA to be added and screened in.	Amended to include Elenydd Mallaen. Table 2 has also been amended to reflect this.
North Pembrokeshire Woodlands may require screening back in due to Barbastelle records on the County border and possible lighting and disturbance issues.	Agreed. Screened in on a precautionary basis.
Table 12 Summary of the preliminary screening based on overall growth projection of Preferred Strategy.	

• Aquatic environment – Hydrological links also need to be considered.	Agreed. Generic level screening text now amended to read: Effects only likely where development is in close proximity to a water course that flows into/out of a site. Hydrological links must also be considered.
• Mobile species – Requires addition of Lesser Horseshoe bats.	Amended.
• Mobile species – Requires addition of terrestrial SPA (Elenydd-Mallaen)	Amended
• Development: Air pollution – We do not agree with the generic screening level; intensive agriculture and other industrial sources have a potential to impact.	Agreed. Wording of generic screening level amended to address this. Text now reads: Development which leads to increased traffic on roads within 200m of identified sensitive sites. Consideration will also be given to any potential impacts from intensive agriculture and other industrial sources.
Table 14 Summary of preliminary screening of draft Strategic Policies.	
• SP8 Infrastructure – Clarification is required as to why this has been screened out, we consider it could have potential impacts to sites and features.	Agreed. Policy will be screened back in and will be considered further in light of specific policies and site allocations in order to determine likely significant effects. Screened in under Category I.
• SP12 Rural development – Should we consider agricultural development under this? If so, it cannot be screened out.	The Strategic Policy on Rural Development does not consider agricultural development. These matters are considered under existing national planning policy and legislation, and further detailed policies will be developed in the Deposit Plan.
• SP17 Transport and Accessibility - Clarification is required as to why this has been screened out, we consider it could have potential impacts to sites and features.	Agreed. Policy will be screened back in and will be considered further in light of specific policies and site allocations in order to determine likely significant effects. Screened in under Category I.
• SP18 Mineral resources -This should not be screened out due to Cernydd Carmel SAC.	Disagree. This policy is a safeguarding policy for mineral resources and does not facilitate the removal of mineral deposits. This policy essentially

	provides a second layer of safeguarding of the site from development and is therefore screened out as having likely significant impacts.
• 3.4.2 Further Strategic Policies from Table 14, such as mineral resources, should added.	This section will be updated accordingly.
Appendix 1: Conservation objectives of sites identified as within 15km buffer zone of Carmarthenshire. • The updated conservation objectives for the sites can are in the appendices to this letter.	Conservation objectives have been amended to reflect most up to date information provided by NRW in their representation.
Appendix 2 Nitrogen Deposition Data for SAC's/SPA's within Carmarthenshire and 15km buffer • The Afon Tywi should be included.	Noted. Appendix will be amended to include Afon Tywi.
Appendix 3 Plans and Programmes with potential in-combination effects. • West Wales Tourism Strategy 2008 – West Wales Marine candidate SAC to be included. • Welsh Government Strategy for Tourism 2013-2020 - West Wales Marine candidate SAC and the SPA's to be included due to disturbance. • A walking and Cycling Action Plan for Wales (2009-2013) – Disturbance and erosion should be included as potential issues. • The Swansea Bay City Region Economic Regeneration Strategy 2013-2030 - Disturbance and erosion should be included as potential issues. • Carmarthenshire Designation Management Plan 2015 – 2020 – We would advise that there is potential for increased soil erosion from increased tourism and recreation activities. • Flood Risk Management Plan for Western Wales River Basin District – The River Tywi and River Teifi are not included. • Swansea Local Development Plan (2010-2025) – Burry Inlet RAMSAR site.	Noted. This Appendix will be updated for the Deposit Plan HRA to include the documents suggested.
Appendix 5 Preliminary screening of draft Strategic Policies. • SP18 - Mineral Resources – We consider Cernydd Carmel should be screened back in.	Disagree. As explained in response to comments made on SP18.
Pembrokeshire Coast National Park - Martina Dunne	
General Comments	

The Conservation of Habitats and Species Regulations 2017 Para 2.3 page 7. The Conservation of Habitats and Species Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments.	Noted and amended throughout document.
People Over Wind In April 2018 the Court of Justice of the European Union handed down their judgment in the case of People Over Wind. The court ruled that it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce harmful effects on a European site. It is suggested that the HRA Screening Report should make explicit mention of the judgment and describe how the HRA is incorporating the ruling. The Habitats Regulations Assessment Handbook (DTA Publications Limited) listed on page 7 has been updated to reflect the judgment.	Noted. Reference to this judgement will be included in the deposit plan HRA.
Sites and species of European importance It is suggested that the Preferred Strategy should include specific policy wording in regard to sites and species of European importance, as implied in the "specific policy restriction" identified as being required for several of the screened in elements. This policy wording might be included within policy SP13, or as an additional policy on sites and species of European importance. Screened-in elements of the Preferred Strategy may then be amended to cross-refer to this policy wording, e.g. 'subject to there being no unacceptable adverse effects on Carmarthenshire's environment (see SP13), including sites and species of European importance (see SP13 (and / or new policy reference))". This would complement the approach taken in Pembrokeshire Coast National Park Local Development Plan 2 and enhance the compatibility of the plans.	Noted. Consideration will be given to the wording of a specific policy for inclusion in the Deposit plan.
Pembrokeshire Coast National Park Local Development Plan Page 36 and Appendix 3 – there is no mention of the Pembrokeshire Coast National Park Local Development Plan (adopted or LDP2).	Noted, this section will be updated to include reference to the Pembrokeshire Coast National Park LDP.

Typos “Bosherton” should be replaced by “Bosherston” wherever necessary. “Affects” should be replaced by “effects” where appropriate.	Noted and amended.

Appendix 5

Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA)

Scoping Report and Initial Report responses

Appendix 5: SA/SEA Scoping Report – Representations Received

Organisation/Comment	Response/Action
Calon Cymru Network – Patricia Dodd Racher	
General Comments	
A great deal to approve of in this scoping study, especially the determination to accord with the Well-Being of Future Generations (Wales) Act 2015.	Noted
In addition, explicit reference to the Environment (Wales) Act 2016 would be helpful, so that the LDP can be assessed against the minimum emissions reductions specified in the Act.	Accepted. Explicit reference to be added.
Natural Resources Wales – Sharon Luke	
General Comments	
Having reviewed your Draft Scoping Report dated July 2018 we are satisfied with your scope for the SA report. As indicated in the scoping report, you have noted that the SA is an iterative and on-going process. We agree and would add that the SA/SEA should be a live document. This is particularly important when you consider that environmental baseline data is evolving, and other plans and programmes are emerging as a result of new legislation. The SA/SEA should therefore be kept under review throughout the LDP preparation.	Noted – SA/SEA will be reviewed and updated in line with developing baseline data and emerging policy, plans and programmes.
The scope and methodologies proposed for the SA seem reasonable. The scope has identified the likely environmental characteristics effected by the LDP and recognises the existing environmental problems within the LDP area.	Noted
The SA objectives noted in Chapter 6 (SA/SEA framework) and Table 3 of Chapter 5 should provide a robust assessment of environmental impacts from the LDP strategic options.	Noted
We advise that the SA indicators and targets (table 4) seem usable although would recommend the following points are considered. SA Objective 2 Biodiversity SA/SEA Scoping Report - Responses	Accepted. Objective reworded to included reference to connectivity and

• Objective to promote resilience of ecosystems to encompass avoiding the damage or fragmentation of designated sites, habitats and protected species and to encourage connectivity.	resilience: ***2-1 To promote resilience of ecosystems by avoiding the damage or fragmentation of designated sites, habitats and protected species and to encourage connectivity.***
SA Objective 3 Air Quality • Consider the use of improve alongside reduce in objectives 3-1 and 3-2. • Include cumulative impacts.	Accepted. Objectives reworded to read: ***3-1 To maintain and improve the levels of the UK National Air Quality pollutants*** ***3-2 To improve levels of ground level ozone***
SA Objective 5 Water • We advise that Objective 5-5 should also include reducing the impact of flood risk. • The decision-making influences could include – Will the LDP reduce/increase the risk of bathing waters reaching Blue Flag status?	Accepted. Objective reworded to read: ***5-5 To make space for water, and minimise and reduce flood risk***
SA Objective 7 Soil • The LDP should not increase contamination we would advise this is removed.	Accepted. Objective reworded to read: ***7-1 To promote the regeneration of contaminated land.***
SA Objective 9 Landscape • Cumulative impacts should be included. • Geological heritage should be included. • Areas within Carmarthenshire are in view of the Gower Area of Outstanding Natural Beauty.	Accepted. Wording of Objective issues and opportunities changed to include reference to cumulative effects, geological heritage and potential trans-boundary impacts with Gower Area of Outstanding Natural Beauty.
Appendix A: Review of relevant plans, policies and programmes	
We would advise that the following are also included.	Accepted. Will add to Appendix A.

• Urban Waste Water Treatment Directive 91/271/EEC. • The Groundwater Directive 2006/118/EC. • The Bathing Waters Directive 2006/7/EC. • The Water Resources (Control of Pollution) (Silage, Slurry and Agriculture Fuel Oil) (Wales) ['SSAFO'] Regulations 2010. • Memorandum of understanding for protection of Carmarthen Bay and Estuaries European Marine Site. • Under PPW Technical Advice Note (TAN) 15 we advise you include Chief Planning Officers (CPOs) letter 23/8/16 CL-03-16 Climate change allowances for planning purposes. • Under PPW Technical Advice Note 5 we advise you include CPOs letter 1 March 2018 European Protected Species Licensing – notice of revised procedure.	
Appendix B: Baseline Information	
The baseline information to be collected appears to be thorough. Please note that NRW have duties under the Environment Act (Wales) 2016 and the Well-being of Future Generations (Wales) Act 2015 which will result in the preparation of further evidence. This evidence should be used in the SA/SEA, if timeframes allow.	Noted. Further baseline information as a result of NRW's duties will be included as and when available.
Chapter 2 The River Cleddau Special Area of Conservation should be included under European sites.	The River Cleddau was included in the table of European Sites under paragraph 2.4.
Chapter 3 Air Quality consideration should be given to cumulative impacts/effects.	Accepted. Baseline information will be updated to consider cumulative impacts.
Chapter 5 In section 5.5 consideration to the proliferation of intensive poultry and pig should be included alongside dairy.	Accepted. Baseline information will be updated to consider poultry and pig farming.

Section 5.6 refers to a map identifying the bathing waters which is not included.	Accepted. Map to be included.
Flood risk – Welsh Government are currently reviewing TAN 15 which should be completed with your timescales. For Section 5.13 Welsh Government have also stated that climate change is to be considered which is not currently mapped	Noted. Baseline will be updated with any new publication of TAN 15.
Other matters to consider	
Drainage infrastructure Memorandum of Understanding requirements for protection of the Carmarthen Bay and Estuaries European Marine Site.	Accepted. Section on drainage infrastructure will be included as part of the baseline information.
Prevention of the proliferation of private foul drainage systems by ensuring appropriate infrastructure in areas identified for growth for the protection of water (and soil) quality.	
Opportunities sustainable drainage systems can bring to ecosystems.	
Renewable Energy The Brechfa Forest Strategic Search Area (SSA) G and Pontardawe SSA E.	Accepted. Section on renewable energy will be included as part of the baseline information.
Incorporating a Sustainable management of natural resources (SMNR) approach. SMNR is defined in the Environment Act as "using natural resources in a way and at a rate that maintains and enhances the resilience of ecosystems and the benefits they provide. In doing so, meeting the needs of present generations of people without compromising the ability of future generations to meet their needs, and contributing to the achievement of the well-being goals in the Well-being of Future Generations Act.	Noted. Will consider ways to incorporate this into the Deposit SA.

Appendix 9 – Consultation Responses from Initial SA

Organisation/Comment	Response/Action
Natural Resources Wales – Sharon Luke	
General Comments	
We consider that Carmarthenshire's landscape objective SA 9 links to a greater number of the strategic objectives that defined in Figure 3: Testing of Revised LDP Strategic Objectives against the Sustainability Objectives framework.	Noted. The landscape objective has been reassessed against the strategic objectives and has been linked to all relevant objectives.
Figure 4: Testing of Strategic Growth Options against the sustainability Objectives framework (Page 21). We consider there could be a direct link between growth options and SA9 Landscape. We anticipate that there could be effects e.g. an increased need for greenfield land and pressure on landscapes in a similar way to effects on SA2. There may be potential to mitigate these effects.	Agreed. The figure and supporting text has been amended to reflect impacts of Growth Options on SA2 – Biodiversity.
Section 4.2.1. We note the final bullet point acknowledges the potential to impact negatively on landscapes and cultural heritage.	The paragraph states that all growth has the potential to impact on landscape depending on the selection of sites and implementation of development (e.g. in terms of place making and design, materials used etc.). At the strategic level of detail provided by the preferred strategy is it difficult to say whether there will be negative impacts or not. However, at the deposit stage, there will be more detail on the allocated sites and their landscape context on which to make an assessment.
Figure 7 Testing of Revised LDP Strategic Policies against the Sustainability Objectives framework. We consider some additional strategic policies could have a negative effect on landscape e.g. SP3 and SP6, in a similar way as for biodiversity.	Agreed and amended to more closely reflect the potential impacts on SA2 – Biodiversity.
Figure 8 (page 102) Summary of Sustainability Appraisal of Preferred Strategy. We are not comfortable with the position that the preferred strategy has no negative effect on landscape.	Figure 8 is a summary of all previous sustainability appraisals carried out in the document. It does not conclude that there are no negative effects on

	Landscape, and highlights some potential issues for conflict including SP8, SP12, SP18 and SP19, as well as areas of uncertainty or areas where further information or detail may be required. This figure has now been amended to reflect changes made in other sections of the document as a result of NRW's comments.
Table 8 (page 106) Draft Sustainability Monitoring Framework refers only to Special Landscape Areas in relation to landscape, whereas Appendix 2 Data sources (page 117) refers to the number of developments refused in design grounds and the number approved on previously developed land. We ask for clarification as to the monitoring method used for landscape.	Noted, the additional monitoring data sources have been added to Table 8 to provide a more robust method of monitoring landscape.
Pembrokeshire Coast National Park - Martina Dunne	
Comments on Appraisal of the LDP Strategic Options and Alternatives:	
Spatial Options, appraisal against SA Objective 5. Mitigation for this is effectively now a legislative requirement. SuDS are required for new development under the Flood and Water Management Act (2010). As well as providing mitigation for flash flooding SuDS collect, filter and slowly release water back into the environment.	Agreed, with SuDS now in place, this mitigation is now a legislative requirement and this will be considered as such in the deposit plan.
Comments on Appraisal of LDP Strategic Policies:	
SP6 Employment and the Economy, assessments against SA4. Caveat with "but an increase in industry related traffic as per the commentary on air quality under SA3"	Agreed. Will add in reference to industry related traffic.
General Comments	
On the whole a very balanced assessment, PCNPA support all of the changes to policy suggested by the SA.	Noted.
Missing update/re-issued review of plans and programmes and baseline information. The PPP currently available on the website is missing the	Noted. Will amend deposit plan to include missing LDPs for Pembrokeshire Coast NP and Pembrokeshire CC.

adopted Local Development Plans for Pembrokeshire Coast National Park and Pembrokeshire County Council.	
Suzy Erskine	
General Comments	
2.2.4 The 15 SA Objectives that make up the framework include: SA2 Biodiversity SA3 Air Quality SA4 Climactic Factors SA5 Water SA7 Soil SA9 Landscape SA12 Health and Well-being SA13 Education and Skills SA14 Economy SA15 Social Fabric Regarding the above: Biodiversity is not just about green tourism. If we are to be truly sustainable we could start growing a wider diversity of crops in Wales. Currently only a tiny percentage of farm-land is used for market gardens or fruit trees. We could be growing our own food here and increasing the biodiversity as a result as well as improving the resilience of our local economy and improving people's health. Please let's plant more trees for wildlife, holding water in the soil and enjoying cleaner air. Sheep have been allowed to keep the hillsides bare for so long most people believe that's how they should look. Not so! With trees on the hillsides, our villages won't be flooding, because the trees take up the water and hold on to the soil.	Noted. These are all valid comments which will be considered in the SA of the deposit plan.

Appendix 6

County Council Minutes

(13th January 2021)

Revised Carmarthenshire LDP Representations
Received and Focused Changes (to the 1st Deposit)

COUNTY COUNCIL MINUTES
WEDNESDAY, 13 JANUARY 2021

Agenda for County Council on Wednesday, 13th January, 2021, 10.00 am (gov.wales)

7.4 REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN 2018 – 2033 REPRESENTATIONS RECEIVED AND FOCUSED CHANGES

Minutes:
[NOTE: Councillors J.A. Davies, K. Lloyd, B.D.J. Phillips, G.B. Thomas and J. Tremlett had earlier declared an interest in this item. None were required to leave the meeting as the debate did not focus on any matters involved in the interests declared by them].

The Deputy Leader informed Council that the Executive Board, at its meeting held on the 21st December, 2020 (minute 12 refers) had considered a report detailing representations received on the Deposit Revised Carmarthenshire Local Development Plan 2018-2033 in response to the Council's decision on the 10th January 2018 to formally commence the preparation of a Revised (Replacement) LDP. That resolution included an eight week public consultation undertaken between the 29th January 2020 and, following an extension of over two weeks, closed on the 27th March 2020. That was subsequently supplemented by a further 3 week consultation closing on the 2nd October 2020 to reflect the impact of the closure of public buildings during the final few weeks of the consultation due to the Covid-19 pandemic.

The Deputy Leader advised that the report set out the responses received to the consultation and sought to set out a series of Focused Changes proposed in response to recommendations received along with those which may have emerged as a result of changes in legislation, guidance, evidence or in the interest of clarity and meaning. They also provided an opportunity to incorporate and respond to issues arising from Covid-19, as reported to Council in the Covid-19 Assessment in association with the Revised Delivery Agreement on the 22nd October, 2020.

RESOLVED that the following recommendation of the Executive Board be accepted:-

7.4.1 to endorse the officer recommendations on the consultation responses received to the Deposit Revised LDP, Sustainability Appraisal, Habitat Regulations Assessment and Supplementary Planning Guidance;

7.4.2 to agree to the presentation of the schedule of Focused Changes to Executive Board for approval for a minimum 6-week public consultation;

7.4.3 to approve the submission of the Deposit LDP and its supporting documents, evidence and background documents as required to the Welsh Ministers for Examination;

7.4.4 to grant officers delegated authority to respond to recommendations and requests arising from the Inspector as part of the Examination and hearing sessions;

7.4.5 to resolve to adopt the SPG in relation to Caeau Mynydd Mawr SAC and the Burry Inlet (subject to the outcome of the Examination) concurrent with the adoption of the Revised LDP;

7.4.6 to grant officers delegated authority to make non-substantive typographical, cartographical and/or factual amendments to improve the clarity and accuracy of the Revised Local Development Plan and its supporting documents".

Appendix 7

County Council Minutes

(9th March 2022)

Revised Carmarthenshire LDP – Next Steps and Revised Delivery Agreement

COUNTY COUNCIL MINUTES
WEDNESDAY, 09 MARCH 2022

7.2 REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN NEXT STEPS AND REVISED DELIVERY AGREEMENT

Minutes:
The Council was informed that the Cabinet, at its meeting held on the 14th February, 2022 (Minute 9 refers) had considered an update report on the progress of the Revised Local development Plan (LDP) and, notably, the impact of a series of factors, issues and guidance on the progress and/or future Plan content. In detailing those areas, the report proposed a series of next steps and sought endorsement of the recommendations to prepare a further Revised Deposit LDP to address and mitigate the implications arising from the identified issues and to ensure it was procedurally compliant and 'sound' thus enabling its adoption.

RESOLVED that the following recommendations of the Cabinet be adopted:-

"9.1 To provide delegated authority to officers to amend the Revised Delivery Agreement timetable and agree its content with the Welsh Government;
9.2 To consider the content of the report and endorse the need to prepare a consolidated second Deposit Revised LDP and associated documents;
9.3 To grant the Director of Environment, in conjunction with the Cabinet Member for Planning, delegated authority to establish the Afon Tywi Nutrient Management Board (NMB), develop its terms of reference and prepare a Nutrient Management Plan;
9.4 In conjunction with other key public bodies, to join the membership board for the Afon Teifi, Afon Cleddau and River Wye NMB's"

Appendix 8

County Council Minutes

(7th December 2022)

Revised Carmarthenshire LDP – Draft Second Deposit

COUNTY COUNCIL MINUTES
WEDNESDAY, 7 DECEMBER 2022

6.1 REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN 2018 - 2033 DRAFT SECOND DEPOSIT

Minutes:

[NOTE: Cllr. M. James had earlier declared an interest in this item and remained in the meeting during the deliberation of the report and voting thereof].

Further to Minute 7 of the Cabinet meeting held 14th November 2022, the Council considered a report setting out the Draft Second Deposit Revised Local Development Plan (LDP) which identified the Council's land use Vision, Strategic Objectives and Strategic Growth requirements for the County through to 2033. The LDP included a detailed and comprehensive set of policies and provisions, including site specific allocations for housing and employment use, as well as environmental and other spatial considerations. It was recognised that a series of factors had impacted upon the progress and content of the Plan including, but not limited to, phosphate levels in protected rivers and the Covid-19 pandemic.

Approval was sought for the publication of the LDP and supporting documents as part of a formal public consultation for a minimum statutory period of 6 weeks commencing in January 2023. Thereafter, it would be subject to public examination by a Welsh Government appointed Planning Inspector with a view to its formal adoption in 2024.

In response to a concern raised in respect of the length of the LDP it was clarified that the report format was prescribed by Welsh Government, and therefore it was necessary for the Council to comply with that format in preparing the documentation.

Reference was made to the recent Census results in respect of population growth and the decline in the number of Welsh Language speakers and clarity was sought on how these would be addressed within the LDP. It was highlighted that the LDP, together with its supporting information, were emerging documents which would develop through to the point of publication. This reflected the availability of some pieces of evidence and timelines associated with the LDP's preparation to ensure that the most current information was included at the point of publication. An assurance was provided that the LDP, as a holistic document, was integrated with a range of other key Plans and Strategies within the Authority.

The Forward Planning Manager provided an overview of the engagement methodology and consultation process adopted whereby the LDP was presented

by way of written representations which would be supplemented with digital illustrations and maps to encourage interaction. In response to a query, the Forward Planning Manager reported that the consultation process would provide an appropriate mechanism to address concerns or inconsistencies in respect of the site allocations and how they were portrayed within the LDP.

Tribute was paid to the late Councillor Mair Stephens during her term of office as Chair of the Cross Party Panel. The Cabinet Member for Rural Affairs and Planning Policy, in response to comments made, clarified that local residents were prioritised for affordable housing and should be encouraged by Members to register for affordable and/or social housing, as appropriate.

The Forward Planning Manner clarified to Members that the LDP sought to re-energise town centres in terms of their vitality and viability, with the retail function being supported by other complementary services to increase footfall and vibrancy.

RESOLVED that the following recommendations of the Cabinet be adopted:

6.1 To approve the content of the Draft Second Deposit Revised Local Development Plan 2018 – 2033 (and supporting documents) for formal public consultation.

6.2 To approve the rolling forward of the Draft Supplementary Planning Guidance in relation to the Burry Inlet and the Caeau Mynydd Mawr Special Area of Conservation for adoption concurrent with the Revised LDP.

6.3 To note the Draft Briefing Note on the emerging Economic and Housing Growth Report and agree the recommended revised Growth Option.

6.4 To grant officers delegated authority to make any typographical or factual amendments as necessary in order to enhance clarity of meaning.