Revised 2018-2033 Local Development Plan

Integrated Sustainability Appraisal (ISA) Addendum

Cyngor Sir Gâr 2nd Deposit Plan **Carmarthenshire** County Council February 2024

Mae'r ddogfen yma hefyd ar gael yn Gymraeg

This document is also available in Welsh

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Abbreviations

- (r)LDP (revised) Local Development Plan (also referred to as the Plan)
 - ALC Agricultural Land Classification
 - BMV Best and Most Versatile (Agricultural Land)
 - **ISA** Integrated Sustainability Appraisal
 - **DNS** Development of National Significance
 - LSA Local Search Area
 - SA Sustainability Appraisal
 - **SEA** Strategic Environmental Assessment (also referring to the associated Directive 2001/42/EC, as ratified in Wales by *The Environmental Assessment of Plans and Programmes Regulations 2004*)

1. Introduction

- 1.1 Carmarthenshire County Council is preparing a revised Local Development Plan (rLDP). The rLDP is a land-use plan which outlines the location and quantity of development within Carmarthenshire for a 15-year period between 2018 and 2033, and will replace the existing adopted LDP. Over the course of the preparation of the rLDP, which has undergone several iterations, the accompanying Integrated Sustainability Appraisal (ISA) has been carried out in an iterative and integrated manner as part of the plan making process since 2018.
- 1.2 The scope of the present ISA is to ensure that all proposals contained within the 2nd Deposit rLDP¹ have been duly considered in terms of their potential social, economic, and environmental impacts. This *ISA Addendum* expands upon the findings and recommendations made by the *ISA Report*² (February 2023), *SA Report*³ (January 2020), the *SA-SEA Initial Report* (December 2018) of the Preferred Strategy, and an earlier, informal *SA-SEA Scoping Report*⁴ (July 2018), which are required under the *Planning and Compulsory Purchase Act 2004*⁵, *The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005*⁶ and *The Environmental Assessment of Plans and Programmes Regulations 2004*⁷. Other statutory requirements, duties, and considerations which are incorporated into this holistic assessment are set out in Section 1.4 of the *ISA Report*.
- 1.3 Where appropriate, the present document contains excerpts of, and cross references to, the above-mentioned assessments. Effort has been made to avoid the repetition of supplementary text which is not fundamental to the rationale and conclusions here made. This is to give an accessible and transparent record of the assessment of the rLDP throughout its preparation. Nevertheless, the present document should not be considered in isolation of earlier ISA effort.

Consultation Response

- 1.4 During the consultation of the rLDP and associated documentations, seven consultees including Welsh Government, Pembrokeshire Coast National Park Authority, and members of the public submitted a total of eight ISA relevant representations. These have been subsequently considered within Appendix A which, alongside other officer-led amendments, are proposed as focus changes to the *ISA Report*.
- 1.5 For clarity, there have been no material changes to the rLDP itself since this time.

¹ <u>Carmarthenshire County Council / Cyngor Sir Gâr - Second Deposit LDP (oc2.uk)</u>

² 2nd Deposit rLDP ISA Report.

³ <u>1st Deposit rLDP SA Report</u>

⁴ <u>sa-scoping-report-final.pdf (gov.wales)</u>

⁵ Planning and Compulsory Purchase Act 2004 (legislation.gov.uk)

⁶ The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (legislation.gov.uk)

⁷ The Environmental Assessment of Plans and Programmes Regulations 2004 (legislation.gov.uk)

2. Next Steps

- 2.1 The present *ISA Addendum* will be subject to public consultation. Copies of all ISA documentation are available from the Strategic Policy and Placemaking Section of Carmarthenshire County Council, or they can be viewed on <u>online</u>. The rLDP and associated documents can also be inspected at Customer Service Centres and public libraries during advertised opening hours.
- 2.2 Your views can be made online via the <u>Consultation Page</u>. Alternatively, response forms are available upon request.

If you wish to send your views in writing, please write to:

Strategic Policy and Placemaking Place and Infrastructure 3 Spilman Street Carmarthen Carmarthenshire SA31 1LE

Or email: forward.planning@carmarthenshire.gov.uk

Please include 'ISA' within the subject line.

- 2.3 Representations must be received by the relevant date and time stated upon the Consultation Page. Comments submitted after this date may not be considered.
- 2.4 To ensure that the requirements of the Regulations are met, it will be necessary to consider all further changes to the rLDP following the formal consultation and examination process (including Matters Arising Changes recommended within the Inspector's Final Report). Therefore, additional ISA documentation will be published at this time.

Appendix A. Schedule of Focus Changes to the ISA Report

A schedule of proposed Focus Changes made to the *ISA Report* since its publication in February 2023 is presented below (updated text in red). These have either been made in response to the consultations received or are *errata*. Consultation responses (i.e., ISAREP#) can be found within the Consultation Report (as published for submission).

Ref	Subject	Description	Reason	Implication
1	2.9.4	 In light of the Ref 2, inset footnote following this paragraph: "Due to the timing in preparing this present ISA report, demography and migration data from the Census 2021 was not included in the baseline at the time of consultation. These updates and any other releases aim be reflected later.#" Footnote = #. Data from the Census 2021 has been subsequently considered, please refer to the ISA Addendum Report for a schedule of the associated alterations. 	To reflect changing evidence base.	None.
2	 2.9.4 In light of the Ref 2, inset footnote following this paragraph: "Due to the timing in preparing this present ISA report, demography and migration data from the Census 2021 was not included in the baseline at the time of consultation. These updates and any other releases aim be reflected later.#" Footnote = #. Data from the Census 2021 has been subsequently considered, please refer to the ISA Addendum Report for a schedule of the associated alterations. Appendix B In light of the timing of the release of Census 2021 data and the original consultation of the ISA Report (commenced February 2023), the following paragraphs are inserted accordingly: Chapter 10. Population. Between the last two censuses (held in 2011 and 2021), the population of Carmarthenshire increased by 2.2%, from around 183,800 in 2011 to around 187,900 in 2021. This means Carmarthenshire's population increased by a greater percentage than the overall population of Wales (Figure #). In 2021, Carmarthenshire was home to around 0.6 people per football pitch-sized piece of land. This area was the fifth-least densely populated out 		response to changing evidence base. NB: Source previously stated within Table 11	This must be integrated into the appraisal in light of shifting baseline (see accompanyin g Ref 20).

Ref	Subject	Description	Reason	Implication
		Chapter 11. The Welsh Language.		
		According to the Census 2021, the percentage of Welsh speakers in Carmarthenshire fell from 43.9% in 2011 to 39.9% (Figure #). This was the largest decline in the percentage of Welsh speakers of any local authority area in the country. In 2021, there were around 5,200 fewer Welsh-speaking Carmarthenshire residents (over the age of three years) compared with 2011. The number of people who did not speak Welsh increased by 10,300. Across Wales, the percentage of Welsh speakers fell from 19.0% to 17.8%. These new figures mean that the county now has the second highest number of Welsh speakers of all local authorities in Wales. Carmarthenshire remains the fourth highest in terms of the percentage of the population that are able to speak Welsh. Percentage of people aged three years and over by ability to speak Welsh, Carmarthenshire		
		■ 2011 ■ 2021 0%		
		Cannot speak Welsh 56.1% 60.1% 43.9%		
		Can speak Welsh 39.9%		
		Source: Office for National Statistics – 2011 Census and Census 2021 Figure #. Age-standardised proportion of usual residents by self-reported health, Carmarthenshire.		
		Chapter 12. Health and Well-being.		
		According to the Census 2021, 47.2% of Carmarthenshire residents described their health as "very good", increasing from 45.7% in 2011. Those describing their health as "good" rose from 30.4% to 31.5%. The proportion of Carmarthenshire residents describing their health as "very bad" decreased from 2.1% to 1.7%, while those describing their health as "bad" fell from 6.0% to 5.2% (Figure #).		

Ref	Subject	Description		Reason	Implication
		Age-standardised proportion of	f usual residents by self-reported health,		
		Carmarthenshire			
		• 2011 • 2021	0%		
		Very good health	45.7% 47.2%		
		Good health	30.4% 31.5%		
		Fair health	15.8%		
		Bad health	6.0% 5.2%		
		Very bad health	2.1% 1.7%		
			ics – 2011 Census and Census 2021 oportion of usual residents by self-reported health, Carmarthenshire.		
		Chapter 14. Economy			
		employed (excluding full-time	1, 51.4% of Carmarthenshire residents aged 16 years and over said they were students), down from 52.2% in 2011. In 2021, just over 1 in 50 people (2.1%) ompared with 3.3% in 2011. The percentage of retired Carmarthenshire residents % (Figure #).		

Ref	Subject	Description	Reason	Implication
		Percentage of usual residents aged 16 years and over by economic activity status, Carmarthenshire		
		● 2011 ● 2021 0%		
		Economically active (excluding full- time students): In employment52.2%51.4%		
		Economically active (excluding full- time students): Unemployed 2.1%		
		Economically active and a full-time 1.8% student: In employment 1.3%		
		Economically active and a full-time0.4%student: Unemployed0.4%		
		Economically inactive: Retired 26.7%		
		Economically inactive: Student 4.0%		
		Economically inactive: Looking after 3.4% home or family 4.0%		
		Economically inactive: Long-term sick 6.3% or disabled 6.2%		
		Economically inactive: Other 2.0%		
		Source: Office for National Statistics – 2011 Census and Census 2021		
		Figure #. Percentage of usual residents aged 16 years and over by economic activity status, Carmarthenshire.		
3	Appendix B (page 41)	Reference to the previous Indicative Agricultural Land Classification should be amended throughout accordingly, reflecting BMV Guidance Note (Version 2.1 – published May 2021) and Predictive Agricultural Land Classification Map (Wales). Also, amend the following:	Baseline update, as informed by consultee (see ISAREP1).	
		According to the Agricultural Land Classification (ALC) data available to Version 2 of the Predictive Agricultural Land Classification (ALC) Map, there is no limited Grade 1 and Grade 2 present within Carmarthenshire. A patchwork of Grade 3b land is situated towards the south and southeast of the county following the Tywi river valley, stretching from Llandovery in the east, through Llangadog, Llandeilo and Carmarthen. Most land in Carmarthenshire is classified as Grade 4 and non-agricultural, with a small proportion of Grade 5 situated towards the northeast of the County, as indicated in the summary table provided below.	, ·	
		ALC GradeArea (Ha)Non-Agricultural35093.15619.165		

2 nd	Deposit I	rLDP	2018-	2033
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Ref	Subject	Description	Reason	Implication
		2 520.476 4 59270.802 5 21170.404 3a 17169.167 3b 75638.112 Urban 5549.273		
4	Appendix E Growth Options	1st Deposit PG 10 Year (2019 Addendum Report) LDP Preferred Growth Option. Appraisal is '+/-'yet the shading is that of minor negative effect rather than the yellow, change appropriately.	Alterations made in response to consultee (see ISAREP10).	None.
5	Appendix F ISA Strategic Policies	SP 2: Retail and Town Centres ISA1 has a positive assessment but no commentary. Explanatory text to be provided:The policy recognises the characteristics of provision in a traditional hierarchy ranging from localised provision through to larger population centres. Proposals for retail and other town centre use development is likely to create employment and leisure opportunities which will contribute positively to a sustainable economy and social inclusion.	Material clarity added in response to consultee (see ISAREP8).	None.
6	Appendix F ISA Strategic Policies	SP 10: Gypsy and Traveller Provision ISA8 needed reassessing in light of review, following consultation response. Changing from neutral ('0') to positive effect ('+') accordingly. Explanatory text to be provided: This policy seeks to conserve the way of life, traditions, and culture through the allocation of land designated for the Gypsy and Traveller community.	Alterations made in response to consultee (see ISAREP8). This was an oversight of the assessor, while not covered in the 'Decision Making Influences' for ISA8 within the ISA Framework, SP10 would provide a clear positive benefit (particularly towards 8-1).	No impact upon corresponding conclusions.
7	Appendix F Strategic Policies	 SP14: Maintaining and Enhancing of the Natural Environment ISA9. Amend explanatory comment to the following: "This policy directly refers to the protection and enhancement of natural environment aspects and features (i.e., geology, landform, soils, land cover and hydrology) which help make up Carmarthenshire's landscape." 	Alterations made in response to consultee (see ISAREP9).	None.

Ref	Subject	Description	Reason	Implication
8	Appendix F Amend the appraisal and associated explanatory commentary of SP16. Strategic Policies ISA2 - "Encouraging sustainable transport will in turn may have positive effects on air quality, which currently impacts on certain designated sites in the County. Nevertheless, it is difficult to quantify the likelihood of this benefit actualising (particularly when considering other sources of NOx are typically larger contributors, e.g., rural land use). Additionally, the protection and enhancement of GBI and ecological networks as carbon sinks will have secondary benefits on biodiversity." ISA7 Scoring amended from '0' to 'l'. ISA7 - The alignment of this policy with ISA7 is dependent on the choice of sites and manner in which they are developed. ISA8 Scoring amended from '0' to 'l'. ISA8 - The alignment of this policy with ISA8 is dependent on the choice of sites and manner in which they are developed. ISA9 Scoring amended from '0' to 'l'. ISA9 - Whilst this policy does not contain proposals for development, it is a driver of potential change through supporting climate-related developments (e.g., EV charges, flooding mitigation etc). The alignment of this policy with ISA9 is dependent on the choice of Sites and manner in which they are developed. ISA12 - Scoring amended from '+' to '?'. ISA12 - Minimising the need to travel alongside the enhancement of GBI/ecological networks may have secondary health and wellbeing benefits.		Alterations made in response to consultee (see ISAREP8) and officer review.	None.
9	Appendix G Specific Policies BHE2 (Page 53)	The assessment should include commentary related to the removal of SLA as a non-statutory designation, in alignment with the ISA Framework (i.e., the specific guidance originally agreed for ISA9). Commentary should provide an evidence-based evaluation of the utility of SLA designation, highlighting the drawbacks of boundary-based compartmentalisation which the designation of SLAs currently promote. Crucially, the assessment should consider if/how proposals contained with the rLDP provide an enhanced platform for mitigating contemporary development pressures. Commentary of BHE2: Landscape Character should be amended accordingly: "BEH2 has positive effects across the ISA Objectives, with strong positive effects predicted on ISA9 Landscape. The contemporary relevance and utility of present SLA designation is a contentious issue within the planning system. Research demonstrates that SLA designation as a tool for promoting landscape protection and due consideration is likely outdated, and that landscape character should instead be of primary concern.	Alterations made in response to consultee (see ISAREP7). Officers agree that the absence of explanatory commentary is an oversight of both the previously published SA and the most	None.

Ref	Subject	Description	Reason	Implication
		Therefore, the proposals set out within the rLDP (under BHE2) are aimed to embed a more holistic whole- county approach to landscape character protection, and is considered to be more consistent and relevance to the current planning context (i.e., effectively endorsing an entirely landscape protection approach verses a subjective, spatially limited designation). As proposed within the supporting policy text (paragraph 11.460), a supplementary SPG (supported by the finding of a county-wide Landscape Character Assessment using a robust methodology) is proposed to identify and describe distinctive areas of landscape character. When considered holistically with the intentional wording of BHE2, well-designed developments may have the potentially to contribute positively to the landscape and visual character, and preserve and enhance or restore existing landscape character features."	recent appraisal within the ISA.	
10	Appendix G Specific Policies CCH1/2	Amend the appraisal and associated explanatory commentary of CCH1/2. ISA9 Scoring amended from '+/-' to 'I' for both policies. CCH1/2 – "Renewable energy is essential in ensuring a low carbon energy source and combatting climate change; therefore this policy has strong positive effects on ISA4 Climatic Factors. Proposals for renewable and low carbon energy development have the potential to have negative impacts on biodiversity, particularly when located in proximity to protected sites. These impacts can be someway mitigated by policy SP14: Maintaining and Enhancing the Natural Environment, however it is suggested that some wording is added into the policy itself to strengthen this mitigation. Any potential for negative impacts on ISA9 Landscape can be mitigated by policies SP11 Platemaking and Sustainable Places and BHE2: Landscape Character. These kind of developments are have potential to foster the development of skills associated with delivering innovative, climate responsive design. It is important to note that policies CCH1/2 do not propose tangible renewable energy developments, and they instead define the parameters in which associated applications are to be assessed. The Local Search Areas for solar projects were determined using a comprehensive range of constraints (details found within the Renewable Energy Assessment) and have been reviewed within the HRA in regard to their impact upon protected species. If planning applications were to be received on this sites, further impact assessment would be undertaken at a project level in line with the mitigative considering set out within the plan. Additionally, Carmarthenshire does contain one Pre-Assessed Areas for Wind Energy as set out in Future Wales (referenced within the ISA). Whilst it is not for the rLDP to adopt this, any proposal for large-scale wind energy may be classified as a Development of National Significance (DNS) and, as such, these type of planning development in an acceptable way (subject to conforming to criteria se	Alterations made in response to consultee (see ISAREP8).	No impact upon the subsequent conclusions.
11	Appendix G Specific Policies	Expand upon explanatory commentary for the assessment CCH3.	Material clarity added in response to	None.

2 nd Dep	osit rLDP 2018–2	033		
Ref	Subject	Description	Reason	Implication
	CCH3 (Page 57)	"Provision of Electric Charging Points in new developments will ensure that there is a growing network of charging point across the county to encourage electric car use. This is turn will have benefits for ISA3 Air Quality and ISA4 Climatic Factors, by reducing transport related emissions. Improvements to air quality are also beneficial to ISA12 Health and Well-being, ISA2 Biodiversity and ISA8 Cultural Heritage. Impacts on the wider landscape are considered unlikely given the fact that EV charging placement is most likely to be situated by service centres and residential urban areas. Nevertheless, it should be recognised that a dispersed network of electric charging locations could place a negative impact upon the landscape, particularly within rural and open locations (and if regard to preserving sense of place, distinctiveness, and setting isn't respected). Regardless, this policy is not tailed for supporting this type of development, but instead sets requirements for EV chargers to be integrated into residential and non-residential (where a carpark is provided) development. ISA9 is, therefore, scored as neutral (see appraisal of SP16 for the consideration of this described impact)."	consultee (see ISAREP8).	
12	Appendix G Specific Policies CCH3 (Page 57)	Amend the appraisal and associated explanatory commentary of CCH3. ISA9 Scoring amended from '0' to 'I'. ISA9 – Whilst this policy does not contain proposals for development, it is a driver of potential change through supporting climate-related developments (e.g., EV charges, flooding mitigation etc). The alignment of this policy with ISA9 is dependent on the choice of sites and manner in which they are developed.	Alterations made in response to officer review.	None.
13	Table 17	In light of amendments here proposed, the summary score given in Table 17/20 should be updated accordingly.	See individual Ref.	None.
14	Table 23	The insertion of the assessment outcome of the following sites, as taken from site assessment proformas. $\frac{1}{2}$ $\frac{1}{$	Rectifying error. The summaries from these sites were absent from the final table contained within the ISA Report.	No impact upon the subsequent conclusions raised in regard to rLDP allocations.
15	Table 23	Incorrect Notation Correct Site Reference SuV15/h2 SeC15/h2 SuV34/h1 SuV35/h1	Error.	None.

Ref	Subject	Description					Reason	Implication
16	Table 23	Update ISA7 scoring Topic Paper).	in line with updated baseline (as further re	viewed on an indiv	vidual site	e basis within Soil	Updated site allocation assessment in line	Additional material clarity added.
		Site Reference	Name		ISA7 Old	Score Revised	with ISAREP1 and updated baseline	No impact
		SeC7/h4	Gyferbyn â Pharc Morlais / Opposite F	Parc Morlais	-	I CVISCU	data.	associated
		SeC20/h2	Tir cyfagos i Ysgol Lacharn / Land adj School		-			conclusions. At the
		SuV8/h1	Tir I'r dde o Dol y Dderwen / Land to the Dderwen	south of Dol y	-			planning application
		SeC20/h1	Pludds Meadow		-			stage, project- level
		SeC18/h6	Tir i gefn Heol yr Orsaf / Land to the re Road		-			mitigation
		SuV63/h1	Tir yn Woodend / Land at Woo		-			should be considered.
		SuV61/h1	Tir yn Fferm Nieuport / Land at Nieu	port Farm	-			considered.
		resources from develo to a few instances of hectarage of all site proposal area is situat by the BMV Soil Topic not concentrated with	ting the regeneration of contaminated lan opment occurring on greenfield sites (and t -peatlands)-will be widespread. This is do proposals being on Grade 3a, and 1.54% ed on Grade 3b (46.4%), followed by Urban Paper. Additionally, the distribution settlen in a given area (appropriately situated) a ields throughout the County.	nose rates highly t emonstrated, in pa o on Grade 2. Ne n (15.66%) and Gr nent framework en	through th art, by 11 evertheles ade 5 (13 isures neg	e ALC in addition .20% of the tota s, the majority of .31%), as foretold gative impacts are	ISAREP1).	
18	Table 24 ISA7 (part 2)	Insertion of new paragraph: Furthermore, there is only one mixed use allocation concerned with peatlands - Nant y Caws Regeneration and Mixed-Use Site (PrC1/MU3). Using the <u>Peatlands of Wales Map</u> , the site was found to cover a total peatland area of 2.429 ha (2.78% of site area in peripheral areas). At the planning application stage, project- level mitigation should be considered in order to conserve these resources (protection is explicitly made within NE3, paragraph 11.421). Additionally, Local Search Area (LSA) North East of Farmers (A) and Mynydd Pencarreg (B) is 12.8% and 1.2%, respectively. Due consideration should be given if applications for solar projects are received on such land.				Additional material clarity added. No impact upon associated conclusions.		
19	Table 26 (Chapter 8)	ISA13 14-2 – monitori ISA Objective 13-2 Increase levels literacy (in both		0 /	Data S Stats V https://s	ource	Alterations made in response to officer review.	None.

Ref	Subject	Description			Reason	Implication	
		Welsh and English) and numeracy	(no annual numeracy/English literacy indicator could be found at time of writing – update when available)	h-Language/Annual- Population-Survey- Welsh- Language/welsh-skills- by-la			
20	Table 5	Amend baseline summary for ISA11 Welsh Language: P Future Baseline: Improving Declining ir		Provision for this was previously made in paragraph 2.9.4, and in light of Ref 1.			
21	See description accordingly.	1.4.8 " use of the Welsh 1.4.8 "as inserted by se	- Annual Monitoring Report n Language…" action 11(3), PWA Planning (Wales) Act 20 of the Welsh Language within in the ISA. uidance, and is"		Alterations made in response to officer review.	None.	

2 nd Deposit rLDP 2018–2033				
Ref	Subject	Description	Reason	Implication
		 3.2.3 " towards capturing low-carbon and renewable technologies markets." 3.3.2 " pertinent to Carmarthenshire such as exclusion, including the need to…" 5.8.1 "The main limitations of the SA process at the LDP Preferred Strategy stage was relate to the fact that there is uncertainty over the" 6.2.10 "ISA11, please refer to the WLIA (Appendix H). 6.2.12 " Landscape and the Welsh Language." 6.2.13 "As is the case with any most development, some potential potentially negative impacts remained, particularly with regards to biodiversity, air quality, climatic factors, and the Welsh language. However, with suitable mitigation in place, these negative impacts can be avoided or reduced with suitable mitigation (as put forward by relevant mitigative policies). 6.9.1 "commonly noted, likely effects per purpose type of allocation presented above." 7.0.5 " highlighted within these this assessment (Appendix I), although…" 7.0.6 " upon the Welsh Language. It is critical that due regard is made to the Welsh Language during the implementation of the rLDP, particularly monitoring (as proposed in Chapter 8 and within future AMRs), the publication of a dedicated SPG current to the proposed adoption of the rLDP will help ensure this." Appendix B – Amend Planning Policy Wales to Edition 12. Appendix B – Remove notation of TAN 19 (Telecommunication) in light of recent revocation from Welsh Government. It is a requirement under the Regulations to produce a non-technical summary of the ISA Report. Therefore, a revised version has been produced and published alongside this document. This supersedes all other non-technical summaries previously published, and is available for inspection on our website. 		