

sirgar.llyw.cymru
carmarthenshire.gov.wales

Revised 2018-2033 Local Development Plan

Site Assessment Methodology



September 2022

Contents

1. Introduction	2
2. The Candidate Sites Process and Methodology	4
Flow chart	5
Invitation for Candidate Sites	6
Integrated Sustainability Appraisal (ISA)	6
3. Stage 1 – Initial Site Assessment	8
4. Stage 2 – Detailed Site Assessment.....	9
Stage 2a – Deliverability & Fundamental Constraints.....	10
Stage 2b – Further Detailed Analysis of Sites	13
5. Stage 3 – ISA & HRA	21
6. Other Land Use Proposals	22
Employment Proposals and Mixed Use.....	22
Retail	22
Community Facility.....	22
Minerals and Waste	22
Sites Protected from Development.....	23
Technical Officer Group	23
7. What Happens Next?	24
LDP Examination	24
Further Information	24

1. Introduction

1.1 This document is the third edition of the Site Assessment Methodology (SAM) which sets out the preferred methodology and assessment process for the consideration of land for development in the revised Local Development Plan 2018-2033 (rLDP). In doing so, it identifies the guiding principles for establishing potential new site allocations, consistent with national planning policy and sustainable development. The document will be used as part of the evidence base to support the Council's approach towards the inclusion or omission of sites for development in the rLDP.

1.2 This methodology has been developed to reflect National Planning Policy and legislative provisions. The identification of sites should be founded on a robust and credible assessment of the suitability and availability of land for particular uses or a mix of uses and the probability that it will be developed'. The deliverability of sites will be an important aspect of the methodology and will be essential in the identification of sites for inclusion within the rLDP.

1.3 There is also a requirement to undertake a Sustainability Appraisal (SA) as well as a Strategic Environmental Assessment (SEA) as part of the preparation of the rLDP. It is intended that the SA process will be combined with the requirements for an SEA into a single appraisal process, alongside requirements under the Well-being of Future Generations Act 2015 (WBFGA), Equality Act 2010, Environment (Wales) Act 2016, Technical Advice Note (TAN) 20, and considerations under Public Health (Wales) Act 2017. This process will be referred to as an *Integrated Sustainability Appraisal (ISA)*, and aims to provide a more transparent, holistic, and rounded assessment of the sustainability implications of the growth options, objectives, policies, proposals, and allocations contained in the rLDP. The Council will also need to create a LDP that will have no significant effect (alone and in-combination) on designated European Sites (Habitats Regulations Assessment - HRA) during its implementation. In this regard, those emerging proposals (including site selection) will need to be informed by an iterative review against such frameworks as the plan making process proceeds towards deposit.

1.4 The first edition of the SAM set out the framework and timelines for assessing sites through the LDP process, with particular emphasis on the invitation for candidate sites. The second edition was published in conjunction with the consultation on the first Deposit LDP in January 2020 which identified the sites that the Council were looking to take forward during the Revised LDP period. This third edition provides an updated view on the stages that have

been undertaken to date, whilst identifying the methodology for how sites will be assessed leading up to publication of the 2nd Deposit LDP in early 2023.

1.5 All these factors will, where appropriate, be addressed through consultation with specific consultation bodies during the evaluation of sites, whilst promoters of land will be required to provide an appropriate level of detail to allow a full consideration of their sites.

2. The Candidate Sites Process and Methodology

2.1. The Council is proposing a three-stage process as a methodology for the assessment of candidate sites.

- **Stage 1** is a high-level assessment to identify whether each Candidate Site is compatible against the location of future growth presented in the Preferred Strategy.
- **Stage 2a** seeks to identify sites which have fundamental constraints that cannot be overcome or mitigated for. These include sites that lie within or are likely to have a significant impact on sites designated for their importance to nature conservation, cultural heritage or in TAN 15 flood risk zones. Such sites will not be taken forward to the next phase. In addition, sites which are not considered able to accommodate five or more dwellings, will be considered further under the small site allowance set out within the Plan.
- **Stage 2b** is a detailed, site-specific assessment, and includes analysis of the sustainability of the site, its viability, and the likelihood that it will be developed during the plan period. At this stage, an SA/SEA will be carried out to assess each site as 'reasonable alternatives' against the ISA Framework. Those sites filtered out at Stage 2a are not considered 'reasonable' as they have fundamental constraints that would make them undeliverable and are, therefore, not subject to ISA.
- **Stage 3** will assess those sites that have proceeded through all previous phases and are to be included in the Council's 2nd Deposit LDP. At this stage, a HRA will be carried out on each site to ensure that the Deposit plan will have no significant effect (alone and in-combination) on European Designated Sites.

Site Assessment Methodology

September 2022

Stage 1

Initial Site Assessment

Is the candidate site compatible against the location of future growth presented in the Preferred Strategy?

December 2018

Yes

No

Site moves on to Stage 2a

Site is not considered appropriate and falls at Stage 1

Stage 2a Site Deliverability and Fundamental Constraints

Does the site accord with the questions set out within Stage 2a?

Yes

No

Site moves on to Stage 2b

Site is not considered appropriate and falls at Stage 2a

Stage 2b Detailed Analysis of Sites

Does the candidate site submission accord with the following Planning Principles?

- General Planning Principles
- Accessibility
- Environmental Considerations
- Infrastructure and Utilities
- Welsh Language
- Viability and Deliverability

Yes

No

Site moves on to Stage 3

Site is not considered appropriate and falls at Stage 2b

Stage 3 ISA Site will be Subject to an Integrated Sustainability Appraisal

Invitation for Candidate Sites

- 2.2 Between the 5th of February and the 29th of August 2018, the Council undertook a Call for Candidate Sites, which invited landowners, developers, members of the public and other stakeholders the opportunity to put forward sites for inclusion, or to protect from development as part of the revised LDP. The original site assessment methodology set out a list of questions to inform the consideration of the proposers' sites.
- 2.3 In total, 926 candidate site submissions were received for a range of uses, which included residential, employment, mixed use and recreational uses, as well as those for protection from development. As a result of these submissions, a consultation exercise was undertaken between the 12th of December 2018 and the 8th of February 2019, to allow interested parties to comment on the submitted sites.

Integrated Sustainability Appraisal (ISA)

- 2.4 The ISA is responsible for the evaluation and consideration of several 'reasonable options' against the ISA Framework. This includes the evaluation of sites which are considered as 'reasonable' alternatives, in that they are deliverable and have no fundamental constraints. All sites which pass Stage 2a of this assessment are considered reasonable options and will be subject to ISA assessment.
- 2.5 It was decided that the ISA would be integrated into the SAM, utilising the site-specific information gathered in Stages 1 and 2 to determine the sustainability of sites against the ISA Framework. The decision-making questions in the SAM provide a measurable and more informed assessment of sustainability than the ISA Objectives alone. The questions in Stages 1 and 2 were reviewed as to their compatibility with each of the ISA objectives. Where there was only partial or incomplete coverage of the ISA objectives, SAM questions were modified, or new questions added. Questions are cross referenced as to their compatibility with ISA Objectives throughout this document.
- 2.6 Answers to the decision-making questions within the SAM result in a sustainability 'score' against each of the ISA Objectives, and in line with the key shown in Table 1. Where mixed or negative effects are predicted, mitigation measures should be identified which could improve the performance of the option against the ISA Objectives.

Table 1 – ISA assessment criteria for assessment of candidate sites, as adapted from Welsh Government Development Plans Manual Edition 3 (2020).

Symbol	Predicted Effect and Suggested Action
++	Very positive effect – the proposed site significantly complies with ISA Objective.
+	Positive effect – the proposed site complies with ISA Objective. Consider whether positive effect can be further enhanced through relevant policies.
+/-	Positive and negative effects – the proposed site complies with some elements of the ISA Objective whilst hindering others. Consider mitigation for negative effects.
-	Negative effect - the proposed site conflicts with ISA Objective. Site may be inappropriate for development. Consider mitigation.
--	Very negative effect – the proposed site significantly conflicts with ISA Objective. Site may be inappropriate for development. Consider significant mitigation.
0	Neutral effect compared to the current situation. Consider whether policy intervention could produce positive effects.

2.7 In addition to the integration of the ISA with the site-specific questions contained in Stages 1 and 2, initial regard was made to assess whether the type of development will have an influence upon the ISA Objectives.

Link to ISA Objective:

ISA10 – Population (Housing); ISA10 – Population, ISA11 – Welsh Language, ISA12 – Health and Well-being, ISA13 – Educations and Skills, ISA15 – Social Fabric (Community Facilities); ISA14 – Economy (Employment & Retail); ISA6 – Material Assets (Mineral & Landfill) (Other Waste Recycling); ISA1 – Sustainable Development; ISA10 – Population; ISA14 – Economy; ISA15 – Social Fabric (Mixed-Used / Strategic Site); ISA10 – Population, ISA15 – Social Fabric (Gypsy and Traveller Site); ISA1 – Sustainable Development, ISA4 – Climatic Factors; ISA6 – Material Assets (Renewable Energy).

3. Stage 1 – Initial Site Assessment

3.1 Prior to the consultation of the candidate sites in December 2018, the Council undertook a high-level assessment of the sites to identify whether or not they were compatible against the strategic aims and objectives of the Revised LDP Preferred Strategy. The results of this Phase were published via the Candidate Site Register¹.

Q1. Is the site compatible against the location of future growth presented in the Preferred Strategy.

Link to ISA Objective: ISA1 – Sustainable Development

3.2 The results of this assessment were presented based on the following traffic light system:



Sites which were highlighted green on the initial assessment table will be taken forward for a further, more detailed assessment as part of the preparation of the Deposit LDP.



These sites were considered against the site assessment methodology as the Plan progresses through its preparatory process. The site may comply with the provisions of the Preferred Strategy, however they will not be considered as an allocated land use as they will be based on policy criteria which will be published as part of the Deposit LDP.



The site did not comply with the provisions of the Preferred Strategy as was divorced from the settlement and would result in development in the open countryside. The sites identified in red did not move forward for consideration as part of the 2nd Deposit rLDP.

3.3 The candidate sites identified as green within the initial assessment in December 2018 are now subject to subsequent phases in this methodology.

3.4 Sites identified as amber do not get taken forward within the site assessment process, however the land use which is considered as part of the submission will be subject to planning policies and their criteria set out within the Revised 2nd Deposit rLDP.

¹ <https://www.carmarthenshire.gov.wales/media/1217108/candidate-site-register-paper-002.pdf>

4. Stage 2 – Detailed Site Assessment

- 4.1 The second stage of the SAM is to further consider those sites which are deemed to be compatible with the provisions of the rLDP Preferred Strategy – namely those which were highlighted green as part of the initial assessment of candidate sites within the Phase 1 assessment.
- 4.2 This second stage will inform the content of the 2nd Deposit rLDP, resulting in the identification of sites allocated for a particular land use within the Plan, as well as those areas protected and safeguarded. This stage will also support the delineation of development limits around settlements.
- 4.3 The Council will publish an overview assessment of every site considered as part of the production of 2nd Deposit rLDP, in light of the detailed criteria set out within the SAM. These sites include candidate sites, existing housing allocations, and any other site the Council considers appropriate to be evaluated. Pro formas will be provided on allocated sites as part of the evidence base for the 2nd Deposit LDP consultation in early 2023, whilst the detailed assessment on non-allocated sites will be available on request.
- 4.4 As part of the 2nd Deposit LDP consultation process, there will be an opportunity for representations to be made on allocated and non-allocated sites. Representations during this stage will be presented for consideration at the Examination.
- 4.5 The second stage of the assessment is broken into two parts, Stage 2a and Stage 2b. These are described further in the following sections.

Stage 2a – Deliverability & Fundamental Constraints

- 4.6 Stage 2a assesses site based major constraints. Major constraints are considered to be those which are fundamental and cannot be mitigated or overcome. The following questions were considered in Phase 2a of the site assessment:

Q2. Can the site accommodate 5 or more dwellings?

- 4.7 Only sites capable of accommodating 5 or more houses will proceed to Phase 2b of the site assessment process. It is not considered prudent to identify a minimum site area when assessing the candidate site as it could omit a site which may realistically accommodate 5 or more dwellings. Instead, consideration will be given to the type of site proposed for development and the characteristics and the form of the site and its surrounding area.
- 4.8 Sites not capable of accommodating 5 or more houses will be appraised as part of the review of development limits during preparation of the Deposit Plan.

Q3. Is the site within, or directly related to an identified settlement in Tiers 1-3 of the LDP Preferred Strategy?

- 4.9 The Preferred Strategy and subsequent 2nd Deposit rLDP consider a settlement framework for Carmarthenshire split into 4 tiers– Principal Centres, Service Centres, Sustainable Villages and Rural Villages. The settlements which fall within each of the tiers are identified in Policy SP3 – Settlement Framework.
- 4.10 The principle of the settlement framework is to recognise that the top three tiers of the hierarchy will continue to have development limits and housing allocations as this adds clarity and certainty to the Plan. Candidate sites therefore which are located within Tiers 1-3 will accord with this question of the methodology if they are within, or directly related to the settlement. Directly related to a settlement is defined as, sites which are physically, functionally, and visually linked to the settlement.
- 4.11 In the case of Rural Villages (defined as Tier 4 settlements), they have historically had development limits, and in some instances, sites have been identified with land use allocations. However, the revised LDP considers that development limits should be removed from settlements which fall within Tier 4, and be replaced with a criteria-based

policy. Policy HOM3 of the Deposit LDP sets the parameters for what development may take place and the guidance on acceptable plots.

- 4.12 In terms of the site assessment methodology process, sites within Tier 4 will not be assessed further than Phase 2a.

Q4. Is the site located within a flood risk zone as identified in the TAN 15 Development Advice Maps (DAMs)?

Link to ISA Objective: ISA4 - Climatic Factors, ISA5 - Water

- 4.13 The first edition of the SAM made it clear that the Council would not consider any highly vulnerable development sites which fall within C1, and C2 flood risk zones as delineated by TAN 15 DAM flood maps. Reference is also drawn to the Flood Map for Planning (FMfP) which is due to be implemented alongside the revised TAN15 in June 2023. The FMfP at present constitute a material consideration in planning terms.

- 4.14 The Council has also undertaken a Stage 1 Strategic Flood Consequences Assessment (SFCA) to identify the potential impacts of climate change on flood risk for the lifetime of developments. Sites which are identified as being at risk of flooding through the SFCA are not taken forward, unless further evidence has, can, or will be provided to mitigate, or understand the factors associated with that flood risk.

Q5. Is the site located within or immediately adjacent to any sites for importance to nature conservation?

Link to ISA Objective: ISA2 - Biodiversity

- 4.15 Sites that are located within areas designated as any of the listed key determinants will not proceed any further in the assessment process. These include:
- Sites of Special Scientific Interest (SSSI)
 - Special Areas of Conservation (SAC)
 - Special Protection Areas (SPA)
 - National Nature Reserves (NNR)
 - Local Nature Reserves (LNR)
 - Common Land or registered village green

- 4.16 With regards to a site situated partially within any of the listed key determinants, a precautionary principle will be followed, with a site unlikely to proceed any further in the assessment process.

Q6. Is the site located within or immediately adjacent to any Scheduled Monuments

Link to ISA Objective: ISA8 – Cultural Heritage and Historic Environment

- 4.17 Sites which may impact on the setting or features of a Scheduled Monuments or Remains of National Importance will not be taken forward. Dyfed Archaeological Trust are consulted as part of the Technical Officer group and advise on issues which adversely impact on the Built and Historic Environment.

Stage 2b – Further Detailed Analysis of Sites

4.18 For sites which have been successfully filtered through Phases 1 and 2a, the next phase involves further detailed assessment of sites based on the information submitted within the Candidate Site forms, together with desk-based evidence collected by officers. In addition, site visits will take place to support their assessment within this phase.

Q7. Would development of the site be in contrary to general planning principles?

4.19 These general planning principles seek to establish the acceptability or appropriateness of a development and will consider if it would impact on core planning principles.

4.20 Consideration should be given to the following:

- Unacceptable ribbon development
- Unacceptable tandem development
- Unacceptable coalescence
- Unacceptable sporadic development
- Unacceptable extension to the settlement
- Loss of areas of public open space and formal recreational land.

Q8. Would development of the site result in a detrimental impact on the character and setting of the settlement or its features?

Link to ISA Objective: ISA8 – Cultural Heritage and Historic Environment, ISA9 - Landscape

4.21 Consideration will be given to candidate site submissions which affect landscapes, townscapes, and buildings of importance. The County's historic buildings, townscape and landscape should be treated as an asset and positively conserved. Sites which harm the character of the settlement and its features by virtue of scale, density and prominence will be considered unacceptable. Consideration is given to Local Nature Reserve (LNR), or Regionally Important Geological/Geomorphological Sites (RIGS) and the Green Infrastructure Network.

Q9. Will the proposal involve the re-use of suitable previously developed land/buildings?

Link to ISA Objective: ISA7 – Soil, ISA9 - Landscape

4.22 Previously developed land (also referred to as brownfield) should, wherever possible, be used in preference to greenfield sites. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome. It is recognised, however, that not all previously developed land is suitable for development. This may be, for example, because of its unsustainable location, the presence of protected species, or valuable habitats or industrial heritage, or because it is highly contaminated. For sites like these, it may be appropriate to secure remediation for nature conservation, amenity value, or to reduce risks to human health. There may be instances where it may not be possible to develop sensitive uses on previously developed land without placing unnecessary constraints on adjacent existing businesses and activities which require that particular location.

Q10. Is the site accessible from the existing public highway?

4.23 Sites will need access to the existing public highway. In locations where there is not a connection, consideration must be given to the viability of providing the infrastructure for development to take place.

Q11. Does the site have an available access point with adequate visibility?

4.24 Consideration will be given to the suitability of vehicular access to and from the site. This will focus on the potential impact upon the highways network, and the level of constraint in achieving an acceptable access as to whether a new or improved access will be necessary to enable the site to be developed. This part of the assessment will also be used to identify if additional information such as a Traffic Impact Assessment (to be provided by the Candidate Site proposer) will be required to fully appraise the site. The costs for the creation of an access point is also considered under the viability of the delivering the site.

Q12 Have any significant and evidenced highway issues been identified relating to the site?

4.25 Consideration is given to the impact of the scheme on local, or larger than local highway networks. Sites, by virtue of scale or potential density will be considered against this criteria, and any sites which adversely affect the highway network will not be taken forward.

4.26 For short listed sites to be considered as allocations or supported through a development limit change, highway officers will be consulted to provide detailed observations.

Q13. Does the site have suitable access to public transport and/or active travel route?

Link to ISA Objective: ISA3 – Air Quality, ISA4 – Climatic Factors, ISA6 – Material Assets, ISA12 – Health and Well-being, ISA13 – Educations and Skills, ISA15 – Social Fabric

4.27 National planning guidance highlights the importance for new development to have access to a range of services, facilities, and employment opportunities, which can also be accessed by existing communities. Consequently, the relative distances to existing facilities, public transport stops, and frequency of service will also be considered. Secondly the ease of pedestrian and cyclist access to key services such as primary schools, doctor’s surgeries and local shops will also be assessed.

Q14. Does the site have access to green space, leisure, and recreational facilities that are within a reasonable distance?

Link to ISA Objective: ISA12 – Health and Well-being, ISA15 – Social Fabric

4.28 Consideration is given to the location of proposed development in light of the standards set out within the Natural Greenspace, Play space and Public Open Space Provisions. Should sites not be located in close proximity (as set out in PSD8), then consideration will need to be given to the provision of new (or enhance existing) green or open space (dependent on the type of provision already available).

Q15. Is the site within close proximity to a) employment provision, b) retail provision and c) other services and facilities?

Link to ISA Objective: ISA6 – Material Assets, ISA10 – Population, ISA14 – Economy, ISA15 – Social Fabric

4.29 Consideration is given to the sustainability of a site in terms of their proximity to employment / retail services and facilities. Sites without linkages or suitable access, will not be looked favourably upon.

Q16. Is the site within a reasonable distance to education facilities?

Link to ISA Objective: ISA13 – Education and Skills

4.30 Consideration is given to the sustainability of a site in terms of their proximity to education provision/facilities. Sites without linkages or suitable access, particularly in connection with Question 13 of the SAM will not be looked favourably upon.

Q17. Is the site located within or adjacent to a mineral buffer zone?

Link to ISA Objective: ISA6 – Material Assets

4.31 Buffer zones are used to provide areas of protection around permitted mineral workings where new development which would be sensitive to adverse impacts including residential area will be resisted.

Q18. Is the site located within a Mineral Safeguarding Area?

4.32 Mineral Safeguarding Areas provide for the safeguarding of identified mineral resources, which have the potential to be of economic importance, from unnecessary sterilisation. The identified mineral resource is already largely sterilised when its falls within 200m of sensitive development.

Link to ISA Objective: ISA6 – Material Assets

Q19. Is the site within or immediately adjacent to an Air Quality Management Area (AQMA)?

Link to ISA Objective: ISA3 - Air Quality

4.33 The County currently has three designated Air Quality Management Areas, and any proposed site which has a detrimental impact on the AQMA will be considered in further detail.

4.34 For short listed sites to be considered as allocations, or supported through a development limit change, the Council's Environmental Health Practitioners will be consulted to provide detailed comments.

Q20. Does the site contain high carbon soil e.g., peatlands?

Link to ISA Objective: ISA7 - Soil

- 4.35 Peat bogs are of significant conservational interest and are frequently important for archaeological interest as well as providing a carbon sink and resources which should be protected and conserved for future generations.

Q21. Does the site contain high quality agricultural land (grade 1, 2, 3a)?

Link to ISA Objective: ISA7 - Soil

- 4.36 Agricultural land of grades 1, 2 and 3a as identified within the Agricultural Land Classification Maps is the best and most versatile. Land identified as grade 1, 2 and 3a will only be considered if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.

Q22. Is the site located within or immediately adjacent to any Regionally Important Geological and Geomorphological Sites?

Link to ISA Objective: ISA9 – Landscape

- 4.37 Regionally Important Geological and Geomorphological Sites (RIGS) (also known as Regionally Important Geodiversity Sites) are locally designated sites of local, regional, and national, importance for geodiversity. These sites may provide cultural, educational, historical and aesthetic resources, and are protected from development as a material consideration through the planning system by the Town and Country Planning Act 1990.

Q23. Are there any significant concerns set out in the SFCA – Stage 1 which could impact on the delivery of the site?

Link to ISA Objective: ISA4 Climatic Factors, ISA5 Water

- 4.38 The Council have conducted a Stage 1 Strategic Flood Consequences Assessment (SFCA) to inform and support site selection. The Stage 1 SFCA is a high-level, scoping study that will provide information about the level and nature of flood risk at the proposed candidate sites, along with existing LDP allocations as appropriate.

- 4.39 The flood risk for each site was categorised as either Red (High Risk), Amber (Medium High Risk), Yellow (Medium Risk) or Green (Low Risk). This was based on the area of flooding at each site. The primary source of flooding at each site was also identified. The potential impacts of climate change on flood risk for the developments over their lifetimes were assessed using broad scale assumptions.
- 4.40 Carmarthenshire County Council has also undertaken a Stage 1b SFCA which builds upon the findings of the Stage 1 SFCA, looking in detail at selected Candidate Sites and existing LDP allocated sites in Llanelli, Burry Port, and the surrounding areas. Four potential Gypsy and Traveller sites within this same region have also been considered.

Q24. Does the site have an available water connection?

- 4.41 Sites will be assessed against the availability of water connections. Those sites which are located a distance from a viable connection will invariably cost a significant amount to connect, and a requirement to upgrade to any system or connection links would need to conform with questions 28 and 29 of the SAM which relates to the viability and timescales of new development.

Q25. Is the site within or adjacent to a phosphate sensitive SAC catchment?

Link to ISA Objective: ISA2 – Biodiversity, ISA5 – Water, ISA7 – Soil

- 4.42 Consideration is given to the capacity of the Waste Water Treatments works, NRW's phosphate guidance and phosphate-sensitive SAC catchments, and how it links into DCWW's Capital Investment Programme.
- 4.43 Sites which are located a distance from a viable connection will invariably cost a significant amount to connect, and a requirement to upgrade to any system or connection links would need to conform with criteria 28 and 29 which relates to the viability and timescales of new development.
- 4.44 According to NRW, within SAC catchments failing to meet phosphorus targets it is possible that new development can be permitted if it can be demonstrated it will not lead to further deterioration of water quality in the failing SAC water bodies and will not

undermine the ability for the SAC to meet its conservation objectives. This may be achieved if the proposed development is:

- not a source of phosphorus, or;
- a source of phosphorus but there is no pathway for it to enter the SAC river environment, or;
- measures associated with a given development are put in place so that nutrient neutrality can be achieved, and that the development does not lead to a net increase in phosphorus entering the SAC river environment.

4.45 With regards to a site situated outside of a failing phosphate-sensitive SAC catchment, a precautionary principle must be followed for those sites serviced by public WWTWs without nutrient headroom (i.e., at capacity), in addition to those sites which do not have adequate provision for a compliant private sewage treatment system.

Q26. Does the site have connections to other infrastructure requirements?

4.46 Consideration should be given to the impact of other infrastructure requirements on development in terms of their costs. Whilst a site would not be dismissed on this alone, consideration is given to the viability of the development as a whole.

Q27. Does the location and/or scale of the site have the potential to have a detrimental impact on Welsh Language?

Link to ISA Objective: ISA11 – Welsh Language

4.47 The rLDP will have a policy which will look to support the Welsh Language through the requirement of Language Action Plans or Impact Assessments. At this stage, consideration is given to the scale of the proposed candidate site, and how it may detrimentally impact on the Welsh language.

4.48 Whilst a site would not be dismissed on this point alone, it will be considered cumulatively, and linked to many other criteria within the methodology.

Q28. Has the applicant provided sufficient evidence to show the development is deliverable and financially viable

4.49 Several factors can affect the viability and deliverability of a site. These can for example, include inappropriate adjoining uses, ransom strips, land contamination issues, a lack of infrastructure or the marketability of an area. Another important issue to consider is, is there a genuine identified need for the type of development at its proposed location?

4.50 The Council has undertaken a strategic viability assessment to consider planning obligation contributions and identify benchmark development costs for development within the County. This information will be considered for sites that progress through the site assessment process and will inform any proposed development appraisal.

4.51 In considering these factors, the Council will not take sites forward where it considers there to be fundamental issues with viability

Q29. Has the applicant provided sufficient evidence to identify when the site will be brought forward for development?

4.52 As part of the LDP evidence base, the Council is required to provide a housing trajectory to identify when sites are likely to be brought forward during the lifetime of the Plan.

4.53 Promoters of land should have stated in their submission, the intended timescale for development of the site. This includes pre-application discussions, the timescale of the planning application going through the process, and the time to be taken to commence the development. In considering these factors, the Council will not take sites forward where it considers there to be fundamental issues with the timescales of delivery.

5. Stage 3 – ISA & HRA

- 5.1 The ISA is responsible for assessing all ‘reasonable’ options for development sites to be included in the plan. With regards to the assessment of candidate sites, sites are only considered to be ‘reasonable’ options when they pass all of the criteria set out in Phase 2a (meaning they have no fundamental constraints) and where no significant deliverability issues are identified in Stage 2b. Such sites will then be subject to ISA at Stage 3. There will be instances where sites accord with the methodology but are not taken forward as there may be sufficient and more appropriate sites available within the settlement to meet its housing needs.
- 5.2 Sites that have full planning permission and are currently under construction / substantively complete at the time of formulating the ISA Report on the 2nd Deposit Revised LDP are not considered to require assessment. At this stage, the ISA can provide little value as the site is already being delivered within the plan period.
- 5.3 Other than the above, all sites that are allocated in the Plan, along with those reasonable alternatives, will be subject to an ISA, and will be included within the ISA report on the 2nd Deposit rLDP.
- 5.4 Stage 3 will also involve screening all potential allocations for any likely significant effects (alone and in-combination) on any European Sites. It is acknowledged that the Council is the Competent Authority in this instance and as such its responsibilities in terms of the Habitats Regulations are intrinsically built into the site assessment process.
- 5.5 In relation to the Deposit LDP stage, it will be matter for the Council to produce a Plan that will have no significant effect (alone and in-combination) on the European Sites. In this regard, the Council must ensure that its proposals (including sites) as set out within the Deposit LDP are subject to review against the HRA Report (should the initial pre deposit Screening fail to conclude that there is no potential effect).
- 5.6 The HRA assessment of sites will be documented within the Habitats Regulations Assessment of the 2nd Deposit Revised LDP.

6. Other Land Use Proposals

6.1 In the majority of cases the candidate site submission will be for housing proposals. The Council is proposing to adopt the following approach for other types of land uses being proposed as a candidate site.

Employment Proposals and Mixed Use

6.2 Proposals for new employment, or mixed-use sites containing employment (and non-residential), will be considered further in relation to the level of employment land required to achieve the LDP Strategy and will also be informed by Carmarthenshire's Annual Employment Reviews.

6.3 The proforma for employment sites and mixed-use proposals (non-residential) is different from the residential pro forma in that Question 14 asks is the site within a reasonable distance to areas of population and housing? In addition, question 15 and question 16 have been removed as they are not relevant to these types of developments.

Retail

6.4 The site selection process for retail sites will have regard to any relevant retail or other studies prepared by, or on behalf of the Council and the sequential assessment of sites in relation to retail centres as outlined in Planning Policy Wales.

Community Facility

6.5 Community Facility proposals including open/green spaces and equipped playgrounds will be assessed in relation to whether there is a need for the facility and/or the proposer can provide a strong indication of its deliverability e.g., the proposer owns the land, or a source of funding is identified.

Minerals and Waste

6.6 Candidate sites for minerals and waste will be assessed against the up-to-date Regional Waste and/ or Minerals plans together with any locally identified requirements. Candidate sites which are likely to prejudice mineral resources will be assessed having regards to national minerals policy.

Sites Protected from Development

6.7 The Candidate Site process will also be used to draw attention to sites which should be protected from development and importantly, why the land merits protection not previously identified in the adopted LDP. It is envisaged that these sites will be assessed as to whether they satisfy the relevant criteria to be designated as such, having regards to Planning Policy Wales.

6.8 Land should only be protected from development where it is necessary and appropriate to do so based on sound planning principles and not merely to prevent development from taking place.

6.9 The above uses list is non-exhaustive and the SAM cannot cater for every scenario. Any proposed uses not covered by the above will be assessed on their individual merits having regards to the most up to date local and national planning policy and if necessary, consultation with the relevant organisations.

Technical Officer Group

6.10 A Technical Officer Group (TOG) of consultees comprising of officers of the Authority and external partners (incl. Natural Resources Wales, Dŵr Cymru and the Dyfed Archaeological Trust) has been established to assist and contribute to the plan-making process. A primary function of this group as consultees relates to the screening or consideration of potential sites for inclusion within the LDP. The group and its members considering this function have had the opportunity to comment on and raise issues on a range of prospective sites, with the comments received an important part of the site consideration process.

7. What Happens Next?

- 7.1 The Council will publish an overview assessment of every site received as a Candidate Site, assessed against the detailed criteria set out within the SAM. Pro formas will be provided on allocated sites as part of the evidence base for the 2nd Deposit rLDP consultation in early 2023, whilst a site proformas for non-allocated sites will be available as part of the evidence base.
- 7.2 As part of the 2nd Deposit LDP consultation process, there will be an opportunity for representations to be made on allocated and non-allocated sites. Representations during this stage will be presented for consideration at the Examination as below.

LDP Examination

- 7.3 The 2nd Deposit rLDP, the Pre-Deposit Preferred Strategy documents, along with all the responses received will be submitted for examination and will be considered by an independent Planning Inspector.

Further Information

- 7.4 For further assistance on the Site Assessment Methodology process or the LDP process in general please see the Council website (see links to Planning > Planning Policy) or email forward.planning@carmarthenshire.gov.uk or contact the Forward Planning Section on 01267 228818.