
Appendix 14 – Responses received to the Focussed Changes consultation on the ISA/HRA (February 2024)

This document was prepared to collate the responses made to the Integrated Sustainability Appraisal (ISA) & Habitat Regulation Assessment (HRA) of 2nd Deposit revised Local Development Plan (rLDP), as published for consultation on 19/02/2024.

Summary: Integrated Sustainability Appraisal

A total of 20 representations were submitted during the consultation of the ISA, with responses from six consultees including Dyfodol I'r Iaith Sir Gaerfyrddin, Natural Resources Wales, The Coal Authority, and Mudiad Amddiffyn Porthyrhyd, alongside members of the public (Table 1). Out of the relevant representations made, common themes included the Welsh Language with related commentary on the shift in baseline data from census 2021 data. In addition to the ISA Addendum itself, further comment was received on the ISA Report (as amended by Appendix A of the ISA Addendum).

Summary: Habitat Regulation Assessment

A total of six representations were submitted during the consultation of the HRA Addendum, with responses from Natural Resource Wales, Dŵr Cymru, and members of the public (Table 2). Out of the relevant representations made, common themes included wastewater treatment works, phosphates, in addition to other matters which consists of minor suggestions/corrections.

Table 1. Summary of ISA consultation responses. Italicised text represents representation. Reference numbers are continued from the February 2023 consultation summary.

Ref	Consultee	Consultee Comment (as italicised)	Response
ISAREP13	Wyn Thomas Dyfodol I'r laith Sir Gaerfyrddin	<p><u>Extract taken from letter dated 26th March 2024 and subsequently translated as:</u></p> <p>Ref 2 within Appendix A of ISA Addendum</p> <p><i>Given that the Planning regime is foundational on land use, the comment about population density can lead to an argument for space to build more housing. It needs to be added that this should not be a reason to build many more houses in the county given that the whole county is one of "language sensitivity" and the language outcomes in the 2021 Census set out on page 5. It's housing stock that matters most not land use.</i></p> <p><i>There is no comment in the Implications box. The recognition of the 4% decline in the percentage of Welsh speakers since 2011, and the 5,200 increase since 2011 in the number with no Welsh language is striking and needs attention.</i></p> <p><i>In light of the strikingly worrying figures [remember a 10% reduction from 2001] 3- or 4-bedroom house building needs to be polished except that they meet a local requirement, until the expansion of Welsh language provision in the schools is completed and an effective adult immersion system is put in place and successfully tested.</i></p> <p><i>We note that the graphs refer to the ability to speak Welsh. What is necessary to maintain viable language is its use. The language results from the 2021 Census show that communities with access to consistent use of Welsh are rapidly declining.</i></p> <p><i>In fact the figures and graphs on pages 5 and 6, if not an admission of failure, underline the scale of the challenge to an authority that claims that Welsh is at the core of its work</i></p>	<p>Representation acknowledged.</p> <p>Ref 2 is updating the baseline data. As detailed in Chapter 4 of the ISA, the SEA Regulations require that the ISA contains commentary on the predicted effect on the environmental baseline, both with and without the implementation of the revised LDP. Appendix B is essentially a summary and collation on an information gathering exercise. The inclusion of this update (amongst others) ensures the baseline remain consistent with the best available evidence.</p> <p>Comment on the implication of the change was made for Ref 2 (see page 4, Appendix A, ISA Addendum). Unfortunately, the table being spread across multiple pages made this unclear. Further consideration may be given during examination.</p> <p>Signposting is made to <i>Welsh Language Evidence Update: April 2024</i> which considers the detailed results of the 2021 Census of Population published since December 2022.</p>
ISAREP14	As above	<p>Ref 6 within Appendix A of ISA Addendum</p> <p><i>Welsh is an indigenous language of Wales since Roman times which evolved from the Bretons. It requires a commitment similar, if not more robust than the attention about the gypsies, to the indigenous culture of the county which, as the document points out, faces many challenges and an uncertain future.</i></p>	Comments noted.
ISAREP15	As above	<p>Ref 20 within Appendix A of ISA Addendum</p> <p><i>The Census is the gauge strand the Welsh Government uses. Recognition that there is a 4.8% increase in the percentage with no Welsh language skills since 2011. The recognition that Carmarthenshire has seen the largest reduction of all Welsh authorities underlines the need to reduce the total housing planned to be built, to intensify the work of Welshing the education system and to establish an effective assimilation system for adults coming to live in the county. [Remember that the percentage "born outside Wales" rose from 24% to 26.4% in the same period.]</i></p> <p>[One Million Welsh Speakers] <i>What exactly is that progress?</i></p> <p>[... particularly within rural areas in Carmarthenshire which are known strongholds for the Welsh Language.] <i>Look at the Census results to see which areas have the highest percentages of Welsh speakers. Dr Dylan Phillips in his analysis of the results of the 2011 Language Census, noted the impact of immigration on a large number of rural communities in the county. That decline has continued. The Welshest areas of the county, despite the significant decline in the Amman valley, are the post-industrial wards in the south east of the county (top five)</i></p> <p>[Increases in the provision of Welsh medium schools...] <i>Comment: Note "seek" and "possibly"</i></p> <ol style="list-style-type: none"> <i>How many new Welsh schools and streams have been created in the last five years?</i> <i>How many children attend the Welsh medium schools and streams and how many are in the English medium schools and streams?</i> <i>What evidence does the County Council have that pupils from non-Welsh speaking families attending Welsh schools and streams use Welsh at home and among peers?</i> 	<p>Comments noted.</p> <p>Despite the loss of Welsh speakers according to the 2021 Census, Carmarthenshire County Council is doing its very best to contribute in a meaningful way to the Welsh Government's aim to increasing the number of Welsh speakers in Wales to a million by 2050.</p> <p>Regarding additional clarification on the implication of Ref 20, the change in the future baseline was amended in light of the publication of the 2021 Census results. The determination of future trends was made upon the best available evidence at the time of writing. Irrespective of the stated increases over recent years and the provisions made for promoting the Welsh Language (particularly through schools), the findings from the recent census were not seen to align with the original prediction stated with the ISA Report. It is important to note that the ISA in its entirety is a technical assessment which informs the production and</p>

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		<p>4. <i>What comprehensive immersion regime is at issue in the document, and what evidence is there to demonstrate the success of the immersion policy?</i></p> <p>Clarification needed on the following sentence.... [Following a review it was deemed that the enhanced baseline did not cause any further impact]</p> <p><i>Mitigation measures are too late. It is not aspirins after a seizure that are needed but to avoid the seizure. Table 5 , Ref.20 on page 14, where "Improvement" was changed to "Decline" shows that mitigation measures have not yet worked, and there is no evidence they will be more successful into the future.</i></p>	<p>evaluation of the rLDP, and should not be interpreted as formal Council-adopted prospect.</p> <p>While identifying trends are difficult and remain speculative, it is a requirement for the ISA to examine trends under a 'no plan' scenario. While trend analysis assists in highlighting existing and potential sustainability problems, it is important to note that the primary function of the ISA is to assess the impact associated with the rLDP. Despite the change in baseline made through Ref 20, a subsequent review of the plans impact upon the Welsh Language remains unchanged. This conclusion is consistent with the <i>Welsh Language Evidence Update: April 2024</i>.</p>
ISAREP16	As above	<p>Paragraph 7.0.6 of the ISA Report</p> <p>[It is essential that the Welsh language is given due attention in the implementation of the revised LDP, particularly in light of the related findings of the 2021 Census] <i>This is a promising statement but then...</i></p> <p>[in addition to regular monitoring (as proposed in Chapter 8 and within annual monitoring) the publication of a current specified SPG to the proposed adoption of the revised LDP will help to ensure this] <i>What is the regular monitoring system and what follow-ups can we expect? How will publishing a dedicated SPG help the Welsh language? What is the content of the SPG and is it subject to consultation?</i></p>	<p>Comments noted.</p> <p>The rLDP will be monitored through Annual Monitoring Reports (AMR) and the proposed monitoring framework contained within the ISA (see Chapter 8 of the ISA Report, as amend by Ref 19 and 21 of the ISA Addendum). Combined, these will provide the basis for monitoring the implementation and effectiveness of the rLDP and, ultimately, determines whether any revisions are necessary. When undertaken, these are submitted to Welsh Government and are made publicly available upon our website.</p> <p>All SPGs are subject to a public consultation exercise, which is an integral part of the process towards adoption as material considerations within the determination of planning applications. The SPG for <i>WL1: Welsh Language and New Developments</i> is proposed to be considered for adoption concurrent to the rLDP. Signposting is given to the explanatory text of <i>WL1: Welsh Language and New Developments</i> which outlines the intended content.</p>
ISAREP17	Louise Edwards Natural Resources Wales	<p><u>Extract taken from letter dated 28th March 2024:</u></p> <p><i>We have reviewed the Revised 2018-2033 Local Development Plan Integrated Sustainability Appraisal (ISA) Non-technical Summary, 2nd Deposit Plan February 2024 and the Revised 2018-2033 Local Development Plan Integrated Sustainability Appraisal (ISA) Addendum, 2nd Deposit Plan February 2024 and support the changes, we therefore have no further comments to make.</i></p>	Representation acknowledged.
ISAREP18	Melanie Lindsley The Coal Authority	<p><u>Extract taken from acknowledgement letter dated 28th March 2024:</u></p> <p><i>It is noted however that this current consultation relates to an Integrated Sustainability Appraisal and Habitats Regulations Assessment and I can confirm that the Planning team at the Coal Authority have no specific comments to make on these documents.</i></p>	Representation acknowledged.

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ISAREP19	Cynghorydd Meinir James	<p>Extract taken from snap response dated 2nd April 2024 and subsequently translated as:</p> <p>ISA Report (Paragraph 1.4.9)</p> <p><i>This note refers to the Assessment of the Impact on the Welsh language "for the supporting evidence and commentary in terms of the impact on the Welsh language" But from reading version December 2022 (I cannot see a more recent version on the website) the 2011 Census figures have been used to make the assessment (page 27). The assessment should be redrawn based on the 2021 Census figures as this could change the assessment very significantly. If a more recent version has already been made, I would be glad to receive a copy or be directed to it.</i></p>	<p>Representation acknowledged.</p> <p>Signposting is made to <i>Welsh Language Evidence Update: April 2024</i> which considers the detailed results of the 2021 Census of Population published since December 2022.</p>
ISAREP20	As above	<p>ISA Report (Table 2)</p> <p><i>The columns for the Welsh language line (corresponding issues of the AAS) should have relevant crosses in the same boxes as the line about culture/language under the aims of the Well-being of the Generations Act Future. Health and Well-being with Education and Skills are completely relevant to the Welsh language and that should be noted here.</i></p>	<p>Comments noted.</p> <p>Table 2 provides a comparison of the ISA objectives against the related SEA Issues, national wellbeing goals, and supplementary requirements including other dedicated impact assessments undertaken. A formatting error led to the omission of "... Impact Assessment" (i.e., the WLIA) on the Welsh Language. As outlined within the preceding text, the WLIA is an integrated and integral part of the ISA (alongside the other respective assessments noted within that table).</p> <p>The association between ISA objections and the other elements outlined is dictated by the ISA Framework (Appendix C) which was co-designed through public and stakeholder engagement. In an effort to streamline the assessment, sub objectives and decision-making influences were created for each ISA objective. The Welsh Language does not correlate with those for ISA12 nor ISA13. Nevertheless, it does not correlate with ISA9 either, as mistakenly signified within Table 2. Further consideration may be given during examination.</p>
ISAREP21	As above	<p>ISA Report (Table 5) as amended by Ref 20 of the ISA Addendum</p> <p><i>[ISA11 – Welsh Language] It is appropriate to give a realistic picture of the situation and note that 'immigration can and other factors negatively impacting the proportion of Welsh speakers by challenging the transition of language, especially in the rural areas of Carmarthenshire.' The Welsh-medium progress in education provision and the immersion system is not sufficient to "mitigate the likely impacts associated with its proposals". The Welsh language has to be a community language to survive and have growth in the Welsh speakers and relying on the education system alone is not sufficient to do this. Although the education system is going to increase the number of children and young people who can speak the language, unless there is an increase in the use of Welsh in the community and the current situation is maintained, we growth is seen in the number of speakers in Sir Gar.</i></p>	<p>Comments noted.</p> <p>Signposting is made to the findings of the WLIA and the subsequent <i>Welsh Language Evidence Update: April 2024</i>.</p>
ISAREP22	As above	<p>ISA Report (Appendix H)</p> <p><i>[Section 2.7 of the WLIA] gives constructive and realistic suggestions for how to mitigate' the negative impact of the LDP on the Welsh language.</i></p>	<p>Comments noted.</p>

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ISAREP23	As above	<p>ISA Report (Paragraph 6.2.10)</p> <p><i>There is an acknowledgment here that “these negative effects outweigh any benefits at the level of the projections of the growth options” – i.e. there is more damage (namely a reduction in the number of speakers) that will not be from growth in the number of Welsh speakers in the current LDP. It would be better to reduce the total number of houses that are intended to be built to reduce this damage. While supporting and acknowledging that a large number of affordable housing and housing for first buyers is needed in order to ensure economic growth and the Welsh language, 8,822 is clearly too high a figure as recognized in this point and in the [WLIA].</i></p>	<p>Comments noted.</p> <p>Paragraph 6.2.10 provides a summary of the appraisal of the revised growth options. As visualised in Table 16, those <i>higher</i>-level projections are shown to have negative effects upon ISA11. Higher in this instance refers to the <i>Employment-led</i> and <i>Rebased principal</i>, and, to a lesser extent, <i>Fifteen-year trend</i>. Positive and negative effects are identified with the remaining projections. Embedded policies within the plan have been proposed to mitigate these. Nevertheless, the WLIA concluded that the level of housing growth (8,822 homes, plus 10% flexibility) will not negatively impact the Welsh Language. Further consideration may be given during examination.</p>
ISAREP24	As above	<p>ISA Report (Page 61 and 64)</p> <p>[SP8 The Welsh Language and Welsh Culture and Policy WL1: The Welsh Language and New Developments]</p> <p><i>As the latest SP8 on the Welsh language and Culture of Wales has not been published to coincide with the current consultation we do not have the opportunity to check that this SP8 is going to be strong enough as measures to mitigate the effects on the Welsh language and to ensure its growth in Sir Gar. The latest SP8 which is in line with the 2nd LDP, should follow and include the proposals in Figure 3.1 Strategic and detailed Draft Policies on the Welsh language (page 56 of the [WLIA]). In addition, all Assessments and Language Action Plans should be prepared professionally and independently so that each assessment and plan proposed is accurate and unbiased from any developer.</i></p>	<p>Comments noted.</p> <p>The rLDP, alongside the ISA Report, was subject to public consultation. No changes have been made to the rLDP since its publication for consultation on 17th February 2023. Evidential changes (including Phosphates) required additional works to be undertaken for both the ISA and HRA, and, therefore, an additional public consultation was held to allow public comment on these documents.</p> <p>The rLDP (including policies SP8 and WL1) and ISA (including the WLIA) was produced as part of an iterative process. This included input from independent specialists IAITH & BURUM, as described within Paragraph 4, Part 3, of the WLIA. Further consideration may be given during examination.</p>
ISAREP25	As above	<p>ISA Report (Table 26) as amended by Ref 19 of the ISA Addendum</p> <p><i>[ISA Objective 13] It will be essential that the policies are carefully and regularly monitored to ensure that everything happens to ensure growth in Welsh as a community language in Carmarthenshire. From constant monitoring it will be possible to see in good time, if there are developments taking place within our County without the assessments and plans to mitigate the impact on the Welsh language having been carried out. Hopefully it would then be possible to adjust the requirements if it is seen that the appropriate policies and assessments do not fulfil the requirements to mitigate and ensure the growth of the Welsh language.</i></p>	<p>Comments noted.</p> <p>Agreed. The rLDP will be monitored through Annual Monitoring Reports (AMR) and the proposed monitoring framework contained within the ISA (see Chapter 8 of the ISA Report, as amend by Ref 19 and 21 of the ISA Addendum). Combined, these will provide the basis for monitoring the implementation and effectiveness of the rLDP and, ultimately, determines whether any revisions are necessary. When undertaken, these are submitted to Welsh Government and are made publicly available upon our website.</p>
ISAREP26	Elaine Edwards	<p><u>Extract taken from snap response dated 3rd April 2024 and subsequently translated as:</u></p> <p>ISA Addendum (Appendix A, Ref 2)</p>	<p>Representation acknowledged.</p> <p>Signposting is made to <i>Welsh Language Evidence Update: April 2024</i> which considers the detailed results</p>

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		<p><i>In particular, the document refers to the statistics of the 2021 census results rather than those of 2011 which is a purposeful update and ensures that the information is more current.</i></p> <p><i>...The statistics are alarming when it comes to the Welsh language. Referring to the County as "still the fourth highest in terms of the percentage of the population who can speak Welsh" suggests that there is no problem within the County in terms of the language. This is extremely misleading. It is clear that the situation of the language in the county has deteriorated significantly, and it will continue to worsen without concrete steps by the Council to protect the Welsh language and Welsh-speaking communities. This section clearly shows that the County Council is failing in terms of the Welsh language and there is no suggestion of how to avoid further deterioration.</i></p>	<p>of the 2021 Census of Population published since December 2022.</p> <p>The recognition of the 2021 Census results, particularly those in comparison to other Counties, by no means undermines the severity of the findings. Within the planning context, the rLDP recognises the whole county as an area of linguistic sensitivity and the policies within it seek to maximise opportunities for the Welsh language to thrive and allow appropriate small-scale development in rural communities. Nevertheless, Carmarthenshire County Council is determined to ensure that Welsh remains a living language in the communities of Carmarthenshire (signposting is given our website which includes the Welsh Language Promotion Strategy (2023-28). Further consideration may be given during examination.</p>
ISAREP27	As above	<p>ISA Addendum (Appendix A, Ref 19)</p> <p><i>"Annual increase (or at least no decrease)" as a Target. "No decrease" in terms of Target is not sufficient. Annual increase should be expected and encouraged.</i></p>	<p>As outlined in Chapter 8 of the ISA Report, 'Targets' in this regard help to identify the need for subsequent remedial action to be taken if that ISA objective is not met. It should not be interpreted as a policy objective itself. Both the protection and promotion of the Welsh Language is an integral part of rLDP – reference is given to strategic objective 11, vision for 'one Carmarthenshire', and associated protective policies. While the rLDP has a separate monitoring framework, if the target threshold for 13-2 was triggered (in accordance with the assessment criteria proposed in Table 25) this may lead to a review of the plan itself, particularly if a significant negative effect (in context to the scope of the rLDP) is not effectively remediated. This is to uphold the attainment of the associated ISA objective, which is to increase levels of literacy (in both Welsh and English) and numeracy.</p>
ISAREP28	As above	<p>ISA Addendum (Appendix A, Ref 20)</p> <p><i>It's very sad and a cause for concern that the future baseline for the Welsh language will be "Declining". I believe that the policies of the County Council have a huge role to play in protecting the Welsh language and communities – and the Local Development Plan and a number of the houses that are planned to be built by 2033 are key. Although data about Welsh language skills, according to the document, has varied (due to the results of the census and the results of the Annual Survey), I believe that the statement "making it difficult to decide on the likely trends of the future," is unsuitable. The census gives us the most solid results of the current situation and that clearly shows that the situation of the language within the County is deteriorating. It is extremely misleading to note that there has been "some progress" towards the Million within the County considering the alarming results of the 2011 and 2021 census. It must also be remembered that it is not only the rural areas of the County that are strongholds of the Welsh language. The post-industrial areas (Amman Valley and Gwendraeth Valley) are key for the future of the Welsh language, too.</i></p>	<p>Comments noted.</p> <p>Regarding additional clarification on the implication of Ref 20, the change in the future baseline was amended in light of the publication of the 2021 Census results. The determination of future trends was made upon the best available evidence at the time of writing. Irrespective of the stated increases over recent years and the provisions made for promoting the Welsh Language (particularly through schools), the findings from the recent census were not seen to align with the original prediction stated with the ISA Report. It is important to note that the ISA in its entirety is a technical assessment which informs the production and evaluation of the rLDP, and should not be interpreted</p>

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			as formal Council-adopted prospect. Despite the change in baseline made through Ref 20, a subsequent review of the plans impact upon the Welsh Language remains unchanged. This conclusion is consistent with the Welsh Language Evidence Update: April 2024. Further consideration may be given during examination.
ISAREP29	As above	<p>General commentary</p> <p><i>There are references to "efforts to promote / try to improve / mitigate probable effects" and "possibly reduce the harmful effect of immigration in the short term." There is therefore recognition of the harmful effect of immigration but there are no details about mitigation measures or an intention to reduce the number of houses in the LDP. What exactly will the mitigation measures be? What are the steps that can mitigate the long-term effects of the damage that has already occurred?</i></p> <p><i>It is necessary to consider how to protect the Welsh language and Welsh communities and their traditions.</i></p> <p><i>The Addendum recognizes that it is essential that the Welsh language receives due attention when implementing the revised LDP. How will constant monitoring help without constant action? Reference is made to a specific current SPG. It is not possible to comment on this as there is no copy available for consideration.</i></p> <p><i>As far as I can see the Addendum which is under consultation recognizes the significant decline in the data about the Welsh language but no solutions are offered. "trying / possibly / efforts" suggests uncertainty on the part of the Council. Firm, clear steps need to be taken to avoid further significant deterioration in the near future. The suggested changes (in red) in this document do not go far enough and the language is not strong and firm enough on the Welsh side. It will be necessary to implement extremely robust mitigation measures to address the problems and threats currently facing the language in the County.</i></p> <p><i>It is difficult for a lay person to find out which documents are relevant on your website. To make sure I had the correct ACI document I went to the Library and found the other related documents. They are voluminous, challenging documents for a lay person. In addition, there was no copy of the Impact Assessment on the Welsh language in the Library - it was only available online. Why? In terms of the bulk of that document it is difficult to read on the screen and it is costly and laborious for people to print such documents. Many of the documents were in Carmarthen Library but were also available in English. It is very important to make local democracy open to everyone.</i></p>	<p>Comments noted.</p> <p>The purpose of the ISA is to identify any likely significant economic, environmental, and social effects of the rLDP, then suggest relevant mitigation measures, ultimately to help decision making and the attainment of sustainable development. The selection of the preferred growth strategy was also informed by the ISA (as assessed in Appendix E) in addition to the WLIA (Appendix H, Paragraph 2.4.3). With respect to mitigation measures put forward for those negative effects identified on the Welsh Language, both SP8 and WL1 are to be considered as embedded mitigative policies (signposting is given to Appendix F and G).</p> <p>All SPGs are subject to a public consultation exercise, which is an integral part of the process towards adoption as material considerations within the determination of planning applications.</p> <p>The associated impact assessments of the rLDP are technical documents. We do publish of a non-technical ISA summary which provides an overview of the appraisal process and the assessment findings. While not related to this specific consultation, seven drop-in sessions were held across the County for the previous public consultation exercise on the rLDP. In addition to online, all documentation was made available, both in Welsh and English, at the Council's Customer Service Centres and all public libraries.</p>
ISAREP30	Mair Evans Mudiad Amddiffyn Porthyrhyd (MAP)	<p><u>Extract taken from email response dated 3rd April 2024 and subsequently translated as:</u></p> <p>ISA Report (Paragraph 5.3.1)</p> <p><i>It was really nice to get to [this paragraph] and read: "Later, the Sustainability Appraisal recommended that minor changes should be made to the wording, in order to refer directly to the importance of the Welsh language in Carmarthenshire."</i></p> <p><i>Please note that there are only 'minor' changes to the wording here. The exact same number of sites remain earmarked for the exact same number of dwellings – many of which are proposed developments of much more than 5 and 10 houses in small villages. Residents of several small villages in Carmarthenshire know how challenging the task of opposing a planning application is once a site has been allocated in the LDP for a large number of houses.</i></p>	<p>Representation acknowledged.</p> <p>Some matters of this representation are beyond the scope of the ISA, for which this consultation relates to.</p>

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ISAREP31	As above	<p>ISA Report (Paragraph 6.6.7)</p> <p><i>It was interesting to read [this paragraph]</i> <i>On first reading what is claimed sounds reasonable. An attempt is made to justify development in rural areas 'in order to preserve (and improve) essential facilities and services in those areas' such as schools, shops, public transport etc. Certainly, a number of new arrivals to a village could possibly help to keep a school open but by now many of the country's small village schools have already been closed e.g. Llanarthne, Mynyddcerrig, Idole Later on the draft admits that 'in the short term such development will not be fully served by public transport and regular active travel routes, and if facilities and services have already been lost in the areas it may be necessary to use private cars.' Aren't most villages now devoid of a regular bus service? Don't employees have to travel to work in their cars? Don't parents have to send their children to school by car?</i></p> <p><i>It goes on: 'The hope in providing controlled development is that facilities and services will be retained in the hope that they will return to rural areas so that they are increasingly sustainable in the medium and long term.' Is this not a witch's dream and another example of putting the cart before the horse? Unfortunately, that's not how things really happen. Consider some of the county's villages. Despite all the houses built in Foelcastell there is no shop, pub, school, doctor's surgery or any other service and there has certainly not been an increase in the number of buses traveling through the village.</i></p> <p><i>Interesting to read the last point in the paragraph in question: "Electric Vehicle charging can also go some way to mitigating any negative impacts, as new development will need to install electric charging units to encourage people to use electric cars in accordance with the Sustainable Transport Hierarchy for Planning (... Version 11). Another witch's dream if ever there was one. There is an application for over-development in the village of Porth-y-rhyd - an application to build 42 houses where there are currently eighty. According to the submitted site plan there will be parking space for 94 vehicles - but there will be no charging point at all. At least it can be argued that this proposed developer is honest enough to realize that there are very few people who can afford to buy an electric car at the moment considering that there is a significant difference between the price of an ordinary car and an electric car. MAP regrets to see such arguments being used again and again especially in the Statement to Support the Application drawn up by planning consultants. Arguments such as the above should not be used to distort and try to justify developing sites that are not sustainable and certainly such arguments should not be used to justify over-development in villages.</i></p>	<p>Comments noted.</p> <p>Some matters of this representation are beyond the scope of the ISA, for which this consultation relates to.</p>
ISAREP 32	As above	<p>General commentary:</p> <p><i>MAP appreciates the opportunity to be part of the consultation process this time again and it is trusted that fair consideration will be given to the following comments. MAP is currently campaigning against a proposed planning application to build 42 houses - an example of over-development that will certainly change the character of the village completely and put another nail in the coffin of the Welsh language. In addition to the worry about the Welsh language, it must be admitted that other factors cause concern as Porth-y-rhyd is a village on a flood plain where there are already problems regarding a failing sewage system and flood risk. There are also concerns about the loss of agricultural land, the increase in transport, the problems brought about by alienation and the fact that this proposed development will not be sustainable.</i></p> <p><i>This position was allocated in the adopted plan (LDP 2006-2018) and as a result any policy 'changes' regarding the Welsh Language will not be of any benefit in our struggle as it is now the eleventh hour! However, we felt compelled to respond in the hope that the experience of Porth-y-rhyd campaigners against intrusive over-development in a small village can somehow help some of the other villages that will face a similar fate when the LDP (2018 – 2033) comes to force.</i></p> <p><i>It was indeed a disappointment to see that there was no delay following the disappointing results of the 2021 Census (published on December 6th 2022) to allow a period of time for the Front-Planning Wing to consider the linguistic climate and the decline in the number of Welsh speakers in Carmarthenshire before presenting final draft of the LDP (2018 – 2033). Although MAP really appreciates the need to allow more time for officials to resolve the Environmental Crisis of phosphates in the rivers, we could not understand why it was not possible to delay when it is a Crisis on the Welsh Language with only 39% of Welsh speakers now in the county. It was indeed a surprise to read in the Foreword '2nd Deposit Version of Carmarthenshire's revised Local Development Plan' that that document was approved for public</i></p>	<p>Comments noted.</p> <p>Some matters of this representation are beyond the scope of the ISA, for which this consultation relates to.</p> <p>Signposting is made to the findings of the WLIA and the subsequent <i>Welsh Language Evidence Update: April 2024</i>.</p>

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		<p><i>consultation at the County Council meeting on 7th December 2022 - twenty-four hours after data was published' r Census. There was no escaping the consequences. Didn't news items draw attention to the decline especially in Carmarthenshire? MAP realizes how challenging a task it is to draw up an LDP but it CANNOT be denied that planning policy has such a direct impact on the language of the community as has been witnessed in villages all over the County over the years.</i></p> <p><i>We understand that 'specific policy changes' affecting the Welsh language have been made following a previous Assessment carried out by laith a Burum in December 2019 but once again only the 2011 Census data was available at that time. We therefore welcome the fact that laith and Burum have been commissioned once again in 2023 to draw up an Assessment and that 'the conclusions of the latest assessment, where relevant, will be adopted in the Integrated Sustainability Assessment'.</i></p> <p><i>According to the Census there was a 4% reduction in the number of Welsh speakers in the County between 2011 and 2021 - the biggest reduction as a percentage point among all local authorities in Wales. The data shows that Carmarthenshire is home to 72,838 Welsh speakers (a decrease of 5,200 since 2011). In addition, by comparing the two censuses there has been an increase of 4.8% in the number of people who say they have no Welsh skills. It is true that a change in terms of age / demographic structure can have a negative impact but the data is not surprising either considering all the immigration that took place during the pandemic with people flowing into the County. Now 1 in 4 residents of the county were born outside the County. Although Carmarthenshire is still the 4th highest in terms of the percentage of the population who can speak Welsh, it must be kept in mind that it is here in Carmarthenshire that the greatest decline in the percentage of Welsh speakers has been seen in any local authority area in Wales. This document attempts to claim that the increase in the number of Welsh schools together with efforts to promote immersion in the language (especially in the rural areas which are strongholds of the Welsh language) can reduce the harmful effect of immigration in the short term. Obviously this depends entirely on the willingness of parents to send their children to Welsh-medium schools and their interest as adults in devoting themselves to learning the language. There is a greater chance for parents of children under 9 years of age to opt for Welsh education for their children, with parents of children aged 9 – 11 years worrying that it is too late before the next step of moving to secondary school. More than likely, the newcomers who are over 11 also attend English-medium schools.</i></p> <p><i>Reference has already been made to how a change in demographics can affect and certainly the fact that the County's birth rate has fallen and more young people are leaving has shown its impact. When discussing Population (Page 28) it is noted that 'the LDP's current affordable housing policy continues to support affordable housing stock, and local policy targets for 2022-2027 include the creation of over 1,000 affordable homes to promote the retention of young people.' Is it not a lack of work and a lack of jobs in various fields that lead to this emigration NOT a lack of housing?</i></p> <p>OVERDEVELOPMENT and the WELSH LANGUAGE <i>Although MAP accepts that a number of various reasons have led to the decline in the number of Welsh speakers, it cannot be denied that allowing over-development in small villages has had a detrimental effect on the language of the community and the character of those villages. When wandering around the County you can't help but notice the villages which have completely changed in terms of size and character, and the saddest thing is that the Welsh language is hardly heard being spoken. These are not just a handful of villages but there is an arm's length list of 'villages that lost the battle.' It would be interesting if a survey was carried out now of the number of Welsh speakers in those villages.</i></p> <p><i>MAP fully agrees that there is a need to build in villages in order to keep villages alive as well as meeting the local need for affordable homes and quality homes to be rented by families. BUT there is a big difference between allowing a cluster of houses on the one hand which would be organic, natural development, and allowing intrusive over-development on the other hand.</i></p> <p><i>We also appreciate that it is the policy of the Front-planning Wing to ensure that each village receives its quota. MAP has no objection to that recommendation either BUT the Front-Planning Wing must accept at times that there are no suitable sites for development in some villages. Take Porth-y-rhyd as an example: this is a village on the floor of a valley, within a floodplain and the main Brianne - Felindre pipeline passes through it. Because of that and the fact that developments are not permitted within a certain distance of the pipeline in order to ensure a safety buffer, it is a very challenging task to find suitable sites. It is more than likely that there are also a number of other villages within the county with a shortage of suitable sites and which cannot receive the expected quota of houses.</i></p>	

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		<p><i>Ideally, MAP would like to see a village protection policy similar to what is seen in England where small clusters of houses are allowed rather than over-developments. It must be remembered that the Welsh Government considers more than 10 houses to be a major development.</i></p> <p><i>Why allow the over-development of small villages and so many 'brown' areas available within the county? Wouldn't it be better to develop these rather than targeting villages?</i></p> <p><i>And what about all the empty buildings - houses and offices etc in towns?</i></p> <p><i>According to research by the Good Move company (August 2021) there were 2,964 empty houses in Carmarthenshire. This is the highest number among the counties of Wales.</i></p> <p><i>The County Council's estimate indicates nearly 2,000 empty houses in the county.</i></p> <p><i>MAP contacted the County Council to inquire about the latest data and this is the information received.</i></p> <p><i>On April 1st 2023 there were 1,984 empty houses in Carmarthenshire - and an increase in the number was seen to 2,207 by the end of the last quarter of the year.</i></p> <p><i>We accept that there are a number of reasons for this such as the slowdown in the housing market due to higher loan rates, problems due to a probationary period, the fact that the County Council is taking advantage of a tenant-free period to make improvements to the property etc. but there over 2,000 empty houses is too high a figure.</i></p> <p><i>The data also shows the period of time that those houses were empty:</i></p> <ul style="list-style-type: none"> <i>• 20% vacant for 6 – 12 months</i> <i>• 31% empty between one and two years</i> <i>• 23% vacant for 2 – 5 years</i> <i>• 26% empty for over 5 years.</i> <p><i>As Porth-y-rhyd is a village in Llanddarog Ward we asked about the number of empty houses in that Ward. At the beginning of 2024 there were 32 empty houses in Llanddarog Ward. MAP is aware that houses for sale are not considered in the process of estimating the need for housing, and we can understand the reason for that. However, it must be remembered that the houses for sale are an important part of the county's housing stock available to buyers. It is now clear that the root of the problem is the misconception that was made at the beginning of the process of accepting the projections and that in the face of a multitude of arguments and evidence that proved to the contrary. That's where the problem starts.</i></p> <p><i>8822?</i></p> <p><i>MAP representatives were present at those early meetings in 2011 when the number of houses that would be needed over the period of the current LDP was discussed. At that time, the recommendations were completely absurd – over 20,000, then 16,500 gradually falling to 15,500. Similarly, MAP challenged the completely unacceptable target of 8,822 set out in the draft of this LDP. Although MAP agrees that it is necessary to provide affordable houses and houses to rent to meet the need locally it was argued that there is no solid evidence that this number of houses is needed. Didn't all the evidence based on the research of experts and other organizations clearly show that this figure was much higher than the need and MAP argued once more that it was a gross OVER ESTIMATE which could lead to OVER DEVELOPMENT. Intrusive over-developments like this would certainly have a negative impact on villages - an impact that would be felt for years to come.</i></p> <p><i>Recommendations of the County Council</i></p> <p><i>In order to strengthen Policy SP8 Welsh Language and Welsh Culture a proposal was passed by the County Council in July 2019 which called for the whole County to be set aside as one of linguistic sensitivity in the revised LDP, with the intention of seeing the Welsh language as a Planning Consideration relevant in managing planning. In addition to that, it was agreed that the Welsh language should be a relevant planning consideration in all developments of 5 houses or more in rural areas and 10 or more in urban areas and that in every community, regardless of the percentage of Welsh speakers. Although the above recommendation is to be welcomed - a number of concerns remain, and many questions arise. Haven't we been in this situation before when a Language Impact Assessment was 'desirable'? MAP is afraid of seeing the same problems arise once again and we implore the County Council to make sure that the policy is firm and clear. Who exactly will assess and compile the reports? Is it a standard / accredited company? Or will we see a number of companies growing overnight as has been seen in</i></p>	

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		<p><i>recent years in the case of translation companies? Will the County Council employ an impartial company or will the developers pay for a 'favourable' assessment? How much attention is actually intended to be given to these assessments? Are there no examples that can be cited from the period when a language assessment existed - but for those clear warnings about negative impacts on the community's language to be ignored and for permission to be given? It is very difficult for the Planning Department to refuse an application especially if the site has already been allocated in the plan and earmarked for a large number of houses. Is it some sort of show of 'good will' that is intended to calm the waters?</i></p> <p><i>Some would argue that this would be a way for the Councillors to avoid coming to a decision themselves (leaving others to decide on their behalf) rather than setting out to ensure the formulation of a sound planning policy that would protect the language of communities into the future . The only way to do that is to accept and admit that a serious mistake was made in relation to the projections at the first stage of the process of drawing up the LDP. Was the message not clearly voiced by many at that time that that mistake is the core of the problem? (Welsh Government, Dyfodol i ir laith, Cymdeithas yr laith etc. Even a few county councillors had seen the 'red light' and questioned the decision.</i></p> <p><i>If the County Council does not have the courage to admit that a mistake has been made at the start of the process, then there is no doubt that the problem will intensify as the 8,822 allow over-development to take place in villages that should be protected. In addition to the above questions regarding the proposed assessments there are several other questions that need a clear answer:</i></p> <ul style="list-style-type: none"> <i>• What is the definition of 'local need' now?</i> <i>• What is the definition of 'affordable'?</i> <i>• How much does it cost to build an affordable home now?</i> <p><i>With a significant increase in the costs of building materials, the profit the developer makes when building affordable houses on a site is very small. Is that why there are now so many requests to increase the number of houses on sites or requests to build only genteel houses and put a sum of money into the general pot? Why isn't consideration given to the statistics of Welsh speakers in a village rather than slavishly sticking to Ward's statistics only? We know that the Appraisal of Sustainability has considered the Welsh language but as Census statistics are used it is not a true indicator of the language situation in a village. Common sense says that the percentages of Welsh speakers within different Ward villages vary greatly so why should a village with a low percentage of Welsh speakers deprive another village of being protected from over development? Doesn't the Welsh Government recommend that residents carry out a Welsh Speaker Survey in the village?</i></p> <p><i>That's what MAP did on behalf of the residents of Porth-y-rhyd and found that the percentage of Welsh speakers in this village was 68.5% - so much higher than the percentage of Welsh speakers in Llanddarog Ward. When a policy guide was drawn up that Ward Percentage would control a decision, that was years ago during the process of drafting the 2006-2018 LDP. At that time, who knew how much the decline would be in terms of Welsh speakers in Carmarthenshire?</i></p> <p><i>It was also not considered that that LDP would still be in force in 2024 and possibly for a few years to come before the LDP in question is adopted. It is likely that by the time the LDP (2018 – 2033) is adopted the results of another Census 2031 will be upon us and who knows what the further reduction will be by then.</i></p> <p><i>In the case of the proposed development of Porth-y-rhyd (which is a site allocated under the old plan) MAP requested that the County Council consider the village's language percentage (68.5%) rather than the Ward's percentage (54.5%) by the that would give a glimmer of hope to protect the community's language. As you know, a village with a percentage higher than 60% has special linguistic significance. We were informed that 'it would not be appropriate to deviate from the policy guidelines'. This was a bit of a disappointment especially when you consider the number of times MAP witnessed over the last twenty years to 'flexibility' and 'deviation from guidelines' in terms of changing things to suit developers e.g. density, number of dwellings and type of housing etc.</i></p> <p><i>Isn't it much more important to be 'flexible' in order to protect a community's language? That is why we ask that the current policy guide of using the percentage of Welsh speakers in the Ward be changed to give fair consideration to the percentage of Welsh speakers in an individual village. By doing that the Welshness of so many Carmarthenshire villages could be protected! It is nearly four years since the County Council called for 'the Welsh language to be a relevant planning consideration in all developments of 5 houses or more in rural areas and 10 or more in urban areas'.</i></p>	

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		<p><i>In the meantime, while waiting for this recommendation to come into force we witnessed more and more over-development within the county. It is a period of scramble ('stampede') with all the developers eager to rush the applications through the process before the period of the adopted LDP ends. There is absolutely no obligation for developers or the officers of the Front-Planning Wing to consider the negative impact and adverse effect this over-development will have on the language of the communities. Isn't that reason enough to be careful to ensure that the next policy will be completely sound in terms of protecting the Welsh language? The details of the process are clearly explained in this document together with the steps taken when considering application sites.</i></p> <p>[see ISAREP32]</p> <p><i>Worse than that, we know very well how the number of houses can increase so much again by the time the developer finally submits the application - as was seen in the case of the proposed site in the village of Porth-y-rhyd. In 2014 when the site was allocated for 27 units the Planning Front Wing recommended that around 6 houses be built at a time on the site in order to mitigate the impact. Imagine the villagers' shock when an application for 42 dwellings was submitted. Unfortunately, there is nothing to protect the close-knit character of the village or the community language as the planning policy guidelines of the old, adopted plan are in force. Very ironically this very site was de-allocated and is not included in the revised LDP. Wonderful world!</i></p> <p><i>Porth-y-rhyd will probably join all the other villages that were overdeveloped and lost the battle. I saw over the 'wealth' sign, The language is for sale in Porth-y-rhyd. It is so important to listen to the anecdotal evidence of the residents of the villages in question. After all they are the ones who live there and know the village best – in terms of the community language, the key important drainage fields, the problems that already exist in terms of infrastructure and the worrisome sewage system. Front-planning officers need to listen to the evidence and give fair consideration to letters, statements, photographs etc. There are so many small jigsaw pieces that need to be put together to get the complete picture before reaching a decision.</i></p> <p><i>The same is true of the language assessment as well. We must ensure that all pieces of the jigsaw are available and look at the complete picture - the big picture - before allowing developments in small villages where the linguistic impact will be so much worse. On June 1st, 2023, the Welsh Communities Commission published first findings in their preliminary report - Position Paper. The Chairman of the Commission is Dr Simon Brooks and he explained the situation simply as follows: "When you build an estate of houses on the outskirts of Cardiff you are unlikely to have the same kind of linguistic impact as you would if you built an estate of houses in Crymch...". Jeremy Miles agreed 'that the challenges facing Welsh-speaking communities have intensified over the past few years.'</i></p> <p><i>Dylan Bryn Jones (Chief Executive of Dyfodol i'r Iaith) said: "The results of the Census are a final warning about the complete disappearance of the Welsh communities... If there was a species of rare animal or plant in danger of disappearing, a series of protective measures would already be in place in those specific habitats!". It is interesting to note here that two ecological surveys - one about dormice - were carried out on the proposed site in Porth-y-rhyd but there was not a single word about protecting the Welsh language in the application package at all. Shouldn't the numbers of houses that are planned to be built in the small villages be calculated now and the impact of continuing with those plans be assessed? It will be too late once planning applications are in place. That's exactly what MAP did recently - set out to look at the sites already allocated for the LDP (2018 – 2033) noting the number of houses that were recommended to be built on each site. Due to the usual trend of inflating the numbers during the process (56% on the Porth-y-rhyd site) MAP set out to find the true possible numbers.</i></p> <p><i>One example is Nantgaredig. Some would argue that more than enough construction has already taken place in this village especially bearing in mind that there is no shop, Post Office, job opportunities, or regular public transport there. There are also no cycling and walking paths leading in and out of the village. It is true that there is a Rugby Club, a primary school and a Surgery but the school is packed, and the Surgery has now reached its quota due to all the numbers that registered there when there was talk of closing the Crosshands surgery.</i></p> <p>[see ISARE32]</p> <p><i>Recently a few developers announced their intention to mitigate the adverse effect on the Welsh language by "advertising locally only a third (say) of the houses on a site and that for a period of eight weeks." Although MAP welcomes the goodwill and concern of these companies, we feel that only crumbs are offered. Once again you have to consider the full picture and see that this would really make little difference to the negative consequences of over-development in a small village.</i></p>	

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		<i>Likewise, the County Council claims that priority will be given to local residents renting houses but once again we all know that factors exist that are beyond the control of even the County Council. MAP regrets that the County Council did not respond positively to Jonathan Edwards MP's request for a Moratorium to give enough opportunity to reconsider the planning policy. The assessment carried out by the laith and Burum company in December 2023 is welcomed but it cannot be denied that what is essential now is to reconsider the projections and the number of houses that are allegedly needed to meet the need locally. If that is not done the flow of doors will be wide open! This is possibly the last chance to ensure a clear and firm policy to protect the Welsh language in Carmarthenshire. It must be ensured that there will be no risk of ambiguity, of misinterpretation or of providing a 'loop – hole' for future developers to claim more houses by over-developing small villages as has happened - and is still happening.</i>	

Table 2. Summary of HRA consultation responses. Italicised text represents response. Reference numbers are continued from the February 2023 consultation summary.

Ref	Consultee	Consultee Comment (as italicised)	Response
HRAREP19	Louise Edwards Natural Resources Wales [3252]	<u>Extract taken from letter dated 28th March 2024:</u> HRA 2 nd Addendum (Appendix C) <i>There are some very minor amendments to be made in order to make the document factually correct, once these changes have been made, we will support the second addendum report. The document still refers to a headroom approach at the WwTW. This should be changed to say that a capacity assessment will be carried out on the WwTW.</i>	Representation acknowledged. These minor suggested amendments are not considered to impact the rationale or overall conclusion of the HRA suite. Further consideration may be given during examination.
HRAREP 20	As above	HRA 2 nd Addendum (Appendix C) <i>Section 5.3.2 NRW Support for Avoidance Mitigation Measures states – “Additionally, NRW have recently shared their ‘live’ mitigation menu produced with the WG and the Nutrient Management Boards (NMBs)”. It is Welsh Government’s mitigation menu and not NRW’s. We did produce it, but we do not own it.</i>	Comments noted.
HRAREP 21	As above	HRA 2 nd Addendum <i>The document refers to permit headroom, please change this to “capacity”.</i>	Comments noted.
HRAREP22	Ruth Bagshaw	<u>Snap response dated 22nd February 2024:</u> General commentary: <i>The documents clearly favour beautiful, rural images of Carmarthenshire. It is important that this rural beauty and the culture, and biodiversity it represents is retained and enhanced. However, the levels of socioeconomic deprivation and health inequalities faced by the community must be addressed. Carmarthenshire is no less beautiful or precious than nearby national parks, and yet it has so much less statutory protection and therefore it is imperative that any plans should be developed AS IF the more unspoiled areas ARE a national park, or similar. We should resist urbanisation and establish plans that are focussed on enhancing rurality, and this should mean small scale, local, sustainable, decarbonising options that support small enterprises focussed on rural, agricultural, cultural, small scale manufacturing etc enterprises. This is what makes Carmarthenshire unique and in need of protection- dark skies, pylon free, slow pace. Right now these things may seem retrograde. But the future almost inevitably will be more local. Restoring travel links, such as trains between Carmarthen and Aberystwyth may seem prohibitively expensive, but long term are likely to be invaluable on many levels beyond the economic- in terms of health, education, employment and cultural enhancement</i>	Representation acknowledged. Conducting a HRA for an LDP is a statutory requirement, and serves to ensure the protection of the National Site Networks (formerly known as European sites). More broader pressures associated with land use are addressed within other works – notably the ISA. Any significant effects (whether positive or negative) concerning the environmental, economic, and/or social sustainability are comprehensively identified through the ISA, and subsequent mitigated through recommendations made to the rLDP team in an integrated and iterative manner. A framework of objectives provided a consistent basis for describing, analysing, and comparing the sustainability effects of the rLDP – these included landscape, biodiversity, health, education, and active travel.

Ref	Consultee	Consultee Comment (as italicised)	Response
HRAREP23	Sarah Eyles	<p><u>Snap response dated 5th March 2024:</u></p> <p>General commentary:</p> <p><i>I wish to put a formal complaint. It is almost impossible for a layperson to understand, assimilate and comment on these plans. They are too complex and there are too many. You should create a breakdown of the main areas of these plans that you want us to comment on. In addition, you should create Zoom presentations that people can attend, ask questions and comment. It is as if you do not really want to engage the public on these plans.</i></p>	<p>Representation acknowledged.</p> <p>The associated impact assessments of the rLDP are technical documents. While separate from the HRA, we do publish of a non-technical ISA summary which provides an overview of the appraisal process and the assessment findings. While not related to this specific consultation, seven drop-in sessions were held across the County for the previous public consultation exercise on the rLDP.</p>
HRAREP24	S Hooper	<p><u>Snap response dated 28th March 2024:</u></p> <p>General commentary:</p> <p><i>Whilst I am pleased to see that a Habitats Regulation Assessment has been carried out for the rLDP as required by law, I am concerned that the impact of the rLDP on the wider countryside, biodiversity and habitats outside of the designated sites is not deemed worthy of assessment. Carmarthenshire is a county that is extremely rich in biodiversity and natural habitats. However, this all needs to be protected and enhanced. We have previously submitted written and photographic evidence on species and habitats that will be adversely affected by development around the village of Trelech; the farmer concerned is currently being investigated by DEFRA regarding habitat destruction and has had to make restitution in the past. However, removing mature trees that stand in the way of "progress" cannot be mitigated by planting saplings and do nothing for the Government/ Assembly commitments to net zero and carbon capture. Carmarthenshire is a county rich in woodland, species-rich grasslands, heaths and moorlands as well as rivers and aquatic habitats – these should be celebrated, protected and restored rather than destroyed or decimated. Carmarthenshire County Council sells this area to the public, tourists and investors with pictures of our stunning natural environment – development on the scale and in the locations proposed will detract from this.</i></p>	<p>Representation acknowledged.</p> <p>Some matters of this representation are beyond the scope of the HRA, for which this consultation relates to. Nevertheless, the wider impact of the rLDP on the environment has been addressed, particularly as the broader environment was featured as a fundamental component with the ISA. By assessing the entirety of the rLDP, the potential significant effects (both positive and negative) are comprehensively identified through the ISA, and subsequent mitigated through recommendations made to the rLDP team in an integrated and iterative manner. Mitigative policies have been embedded within the rLDP, for instance, it is proposed that development that would result in unacceptable adverse environmental effects or that does not result in enhancement of biodiversity will not be permitted.</p>
HRAREP25	Simon Barry (on behalf of Barratt David Wilson (BDW) Homes South Wales)	<p><u>Extract taken from letter dated 2nd April 2024:</u></p> <p><i>Following a review of the HRA 2nd Addendum 2024, BDW raise concerns regarding the following:</i></p> <ul style="list-style-type: none"> <i>The assessment of the Site Allocations and the Phosphate Mitigation</i> <i>Impacts of the lack of Headroom in the Permits for Waste Water Treatment Works</i> <p>Site Allocations and Phosphate Mitigation</p> <p><i>As you will be aware from BDW's previous representations to the Carmarthenshire Second Deposit Revised Local Development Plan Consultation, significant concern was raised in regard to the number of sites directly impacted by phosphates and the concerns around appropriate deliverability. BDW recommend that the Council should reconsider their spatial distribution of housing allocations to include additional allocations outside of the Phosphate Sensitive Catchment Areas. In this regard, BDW again highlight that their proposed allocation at land off Heol-y-Mynydd, Bryn is deliverable and developer lead, with BDW on board and ready to take the site forward. Accordingly, Bryn/Llanelli can accommodate future growth requirements, and the land off Heol-y-Mynydd, Bryn should be included as an allocation.</i></p> <p><i>In terms of the HRA 2nd Addendum, BDW are aware that the updated assessment by Arcadis in Appendix C of the HRA reviewed sites as part of the finalised list of Site Allocations for RLDP as provided by the Authority in October 2023.</i></p> <p><i>It is noted that the Stage 1 RLDP – 'Site Allocation Screening Results' concluded that a number of the sites, previously highlighted in our initial Phosphates Table submitted as part of the Deposit Plan consultation, were Scoped In for further assessment. However, the conclusions and assessment suggest that those Scoped In sites have been reviewed and are to be retained as allocations, subject to the proposed mitigation methods.</i></p> <p><i>Firstly, BDW raise issue with the need for sites to be Scoped In relating to the Phosphate Sensitive Catchment Areas, when there are alternative sites which are developer lead and would remove all the uncertainty and would have a positive impact upon the Councils Housing Trajectory. Currently BDW are aware that over 400 proposed allocated dwellings are within the Phosphate Sensitive Catchment Areas and would be subject to required mitigation. This accounts for a large proportion of the total allocated sites and creates uncertainty in delivery.</i></p>	<p>Representation acknowledged.</p> <p>Some matters of this representation are beyond the scope of the HRA (i.e., support for the inclusion of Land off Heol-y-Mynydd as an allocation) for which this consultation relates to.</p> <p>Carmarthenshire County Council is working proactively to minimise disruption and provide a solution to this unprecedented issue. The publication of revised targets aimed at reducing the concentration of phosphorus in SACs back in January 2021, had a significant impact upon the original delivery agreement of the rLDP. Subsequently, informed by a dedicated assessment on phosphates to inform the HRA, alongside other strategic considerations, planning officers reviewed each individual allocation with a view retain those which will provide the most benefits including in terms of meeting housing needs identified within the local area (in accordance with the preferred strategy).</p> <p>Built on the basis of the IAP, the ensuing Action Plan sets out technical calculations that underpin the quantum of mitigation required and contains detail pertaining to feasibility studies that have substantially progressed the maturity of the identified solutions.</p>

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		<p><i>BDW repeat that additional more suitable sites should be sought which are located outside of the Phosphate Sensitive Areas. Land off Heol-y-Mynydd, Bryn is a suitable location for development, being located adjacent to the settlement of Bryn/Llanelli and located outside a Phosphate Sensitive Area.</i></p> <p><i>Secondly, BDW consider that the proposed mitigation, highlighted within the HRA and the Nutrient Mitigation Options Technical Review (2023) does not fundamentally deal with the situation direct, rather seeks to push the impact further along the allocation/application process. From BDW's understanding the following mitigation is proposed to address the serious phosphate issues:</i></p> <ul style="list-style-type: none"> <i>• Constructed Wetlands</i> <i>• Upgrading Waste Water Treatment Works fund</i> <i>• Developer Impact Assessments</i> <i>• Private sewerage drainage fields</i> <i>• Private sewerage upgrades</i> <i>• SuDS</i> <i>• Buffer strips</i> <i>• Agricultural land use change</i> <i>• River channel re-naturalisation</i> <i>• Terrestrial sediment Traps</i> <i>• Drainage Ditch Blocking</i> <p><i>Whilst BDW appreciate that there is no one panacea to the phosphates issue, the above approaches still raise several concerns. From the review of the HRA and Appendices it is noted that a number of sites are to be mitigated via constructed wetlands, and whilst high-level assessments of feasibility have been carried out, there is no clear timeframe nor detail on this matter and would have significant implications on delivery. Furthermore, the proposal to upgrade Waste Water Treatment Works is currently flawed, as detailed further in the next section, and whilst there is a recommendation at the project level for developers to fund a Developer Impact Assessment to identify required reinforcement works when there is no/limited capacity, this would again have delivery impacts and is subject to a number of other factors including funding and Dŵr Cymru Welsh Water AMP cycles.</i></p> <p><i>Secondary measures to prevent additional loading on foul sewer networks include the incorporation of Sustainable Drainage Systems (SuDS) and other nature-based surface water drainage solutions into scheme designs as well as addition water quality protection measures which may be secured through a Construction Environmental Management Plan. These do not directly address the phosphates issue and are mitigation that is pushed to the application stage, and do not provide the required guarantee of delivery as necessitated by the Development Plan Manual (2020). BDW consider that whilst mitigation is provided, there are still significant ambiguity and concerns regarding the effectiveness and deliverability and again recommend that Land off Heol-y-Mynydd, Bryn is a suitable location for development, being located outside a Phosphate Sensitive Area.</i></p> <p>Waste Water Treatment Works (WwTW) – Headroom/Capacity</p> <p><i>Paragraphs 2.1.7 – 2.1.9 of the HRA indicates that following recent consultation with Dŵr Cymru Welsh Water some WwTW catchments may not have the capacity to accommodate the amount of growth proposed in the RLDP.</i></p> <p><i>BDW consider this to be an issue regarding deliverability and note the HRA confirms the identification of WwTWs in which certain RLDP Allocations may result in the exceedance of the permitted capacity, meaning that a new or modified permit would likely be required to provide for the increase in demand.</i></p> <p><i>In effect, the potential operational headroom (or lack thereof) associated with each environmental permit is not known, and the HRA suggests following a precautionary approach which works on the assumption that exceedance of the permitted capacity could result in adverse effects upon hydrologically connected National Site Network Sites.</i></p> <p><i>BDW note that the full list of the allocated sites which could experience an exceedance of permitted capacity is provided at Table 3 of the HRA and results in over 700 dwellings being impacted, many are also already within the Phosphate Sensitive Area. Clearly this has impacts upon the delivery of the proposed RLDP allocations, and the HRA does recognise this and notes that despite the uncertainty whether developers will fund the works themselves (through planning contributions) or rely upon Dŵr Cymru Welsh Water AMP to deliver the necessary upgrades, if funding was not secured the development would be delayed or phased until the upgrades are delivered, or further capacity is made available to accommodate the proposal. Currently there is complete ambiguity over the approach to be taken and further works to ensure delivery or the RLDP allocations.</i></p>	<p>As discussed within the HRA 2nd Addendum Appendix C, the phasing of mitigation measures may be tied to permissions in an effort to reduce any potential implications on housing delivery. While this may include constructed wetlands, this is not the only proposed mitigation option. Comprehensive Mitigation Guidance has been published to explain the most effective types of mitigation that could be utilised in Carmarthenshire.</p> <p>While these matters are interrelated, the HRA describes both potential adverse effects through increased P loading and wastewater disposal as, in effect, separate impact pathways. This was in light of the emerging nature of phosphate guidance, and to prevent confusion with the appropriate assessment already undertaken within the HRA for the effects identified through wastewater. The secondary measures to prevent additional loading (as contained in Table 5) were not intended to directly address the phosphate issue. Chapter 5.3 of the Appendix C (HRA 2nd Addendum) sets out those Category 1 measures which allow compliance with the Habitats Regulations and avoid adverse effects from the developments arising from the RLDP allocations, in addition to Category 2 measures which will deliver wider phosphorus reductions across the catchment.</p> <p>Since the previous DWF assessment as summarised within the HRA Report, a more recent assessment has since been undertaken in consultation with Dŵr Cymru (as contained within their response below – HRAREP26). While mitigation measures are discussed throughout the suite of HRA documents, this information is principally used by Dŵr Cymru to help inform programming upcoming AMPs.</p>

Ref	Consultee	Consultee Comment (as italicised)	Response																								
		<p><i>BDW do note that Llanelli WwTW is identified in Table 3 as having potential capacity issues, however highlight that a possible solution would be to look to allocate further development in the catchment to allow greater planning contributions and earlier investment in the WwTW. This would be particularly relevant given the important of Llanelli and the fact that the proposed RLDP allocations are constrained by the Phosphate Sensitive Area, in particular:</i></p> <ul style="list-style-type: none"> <i>• SeC16/h1 – Llandilo Northern Quarter (27 Units)</i> <i>• SeC14/h2 – Land Adj Maescader (24 Units)</i> <p><i>The allocation of the wholly deliverable site at land off Heol-y-Mynydd, Bryn would assist in both providing further funding in the WwTW and providing further comfort in the early delivery within the Housing Trajectory (as those other sites are continued to be caught by phosphates).</i></p> <p>Conclusion</p> <p><i>Overall, BDW Homes raise a number of concerns regarding the HRA 2nd Addendum (2024), including:</i></p> <ul style="list-style-type: none"> <i>• The issues raised in regard to the Site Allocations and the Phosphate Mitigation, and the fact that the proposed approaches do not go to the heart of the phosphates issue, rather push the issues further along the process and has the potential to cause significant delays in the delivery of sites.</i> <i>• There is concern regarding the impacts of the lack of Headroom in the Permits for Waste Water Treatment Works, however BDW do suggest that allocating further development, in particular in Llanelli, will assist in earlier work being funded and undertaken.</i> <p><i>Consequently, support is provided for Land off Heol-y-Mynydd, Bryn, which is deliverable and developer lead, it has a developer on board and ready to take the site forward. Accordingly, Bryn/Llanelli can accommodate future growth requirements, and the land off Heol-y-Mynydd, Bryn should be included as an allocation.</i></p>																									
HRAREP26	Dewi Griffiths Dŵr Cymru Welsh Water	<p><u>Extract taken from email dated 3rd April 2024:</u></p> <p><i>[The HRA Report] listed 6 x WwTW where the proposed growth could result in Dry Weather Flow (DWF) permits being exceeded – Parc y Splotts, Cross Hands, Llannant, Laugharne, Pencader and Pendine.</i></p> <p><i>We have revisited this work to assess the impact of growth on WwTW DWF permits, based on 2023 DWF data and the proposed growth in the replacement LDP... We have revisited this work to assess the impact of growth on WwTW DWF permits, based on 2023 DWF data and the proposed growth in the replacement LDP. ...</i></p> <p><i>Please find below an updated list of WwTWs where the replacement LDP growth would exceed the available capacity within the DWF Consent, or where the WwTW is currently non-compliant on DWF:</i></p> <table border="1" data-bbox="451 1291 1498 1690"> <thead> <tr> <th>WwTW</th> <th>DWF position</th> </tr> </thead> <tbody> <tr> <td><i>Adpar</i></td> <td><i>Non-compliant – will need a scheme</i></td> </tr> <tr> <td><i>Cross Hands</i></td> <td><i>Non-compliant – compliance scheme planned by 31/03/2025</i></td> </tr> <tr> <td><i>Cwmgwilli</i></td> <td><i>Non-compliant – will need a scheme (no growth proposed in LDP)</i></td> </tr> <tr> <td><i>Laugharne</i></td> <td><i>Non-compliant – scheme planned in AMP8</i></td> </tr> <tr> <td><i>Llanfynydd</i></td> <td><i>Non-compliant – will need a scheme</i></td> </tr> <tr> <td><i>Llannant</i></td> <td><i>Non-compliant – will need a scheme</i></td> </tr> <tr> <td><i>Pendine</i></td> <td><i>Non-compliant – scheme planned in AMP8</i></td> </tr> <tr> <td><i>Pentrecwrt</i></td> <td><i>Non-compliant – will need a scheme</i></td> </tr> <tr> <td><i>Parc Y Splotts</i></td> <td><i>LDP growth would result in DWF breach</i></td> </tr> <tr> <td><i>St Clears</i></td> <td><i>LDP growth would result in DWF breach</i></td> </tr> <tr> <td><i>Whitland</i></td> <td><i>LDP growth would result in DWF breach</i></td> </tr> </tbody> </table> <p><i>At the current time, not all compliance schemes have been programmed in owing to ongoing data monitoring and the need to scope and design a scheme. For the three WwTWs where the total LDP growth would exceed the DWF permit headroom, we will programme schemes into the AMP process accordingly.</i></p>	WwTW	DWF position	<i>Adpar</i>	<i>Non-compliant – will need a scheme</i>	<i>Cross Hands</i>	<i>Non-compliant – compliance scheme planned by 31/03/2025</i>	<i>Cwmgwilli</i>	<i>Non-compliant – will need a scheme (no growth proposed in LDP)</i>	<i>Laugharne</i>	<i>Non-compliant – scheme planned in AMP8</i>	<i>Llanfynydd</i>	<i>Non-compliant – will need a scheme</i>	<i>Llannant</i>	<i>Non-compliant – will need a scheme</i>	<i>Pendine</i>	<i>Non-compliant – scheme planned in AMP8</i>	<i>Pentrecwrt</i>	<i>Non-compliant – will need a scheme</i>	<i>Parc Y Splotts</i>	<i>LDP growth would result in DWF breach</i>	<i>St Clears</i>	<i>LDP growth would result in DWF breach</i>	<i>Whitland</i>	<i>LDP growth would result in DWF breach</i>	<p>Representation acknowledged.</p> <p>Mitigation measures for the associated effect of DWF exceedances outlined have already been proposed (see paragraph 3.0.2 and Table 5 of the HRA 2nd Addendum).</p> <p>While the data used for this most recent DWF assessment remains subject to change (as seen throughout the development of the rLDP), further consultation (particularly during the pre-application and/or full planning application process) would assess the specifics of any onward proposals and to the extent of which these may have on DWF capacity. In accordance with the embedded measures (mitigative rLDP policies such as SP14 and CCH4), planning permission would not be granted unless any identified adverse effects have been mitigated.</p>
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