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Revised 2018-2033 Local Development Plan

Carmarthenshire Revised LDP Examination

Appendix 2 - Preliminary Questions

May 2024

Appendix 2: Preliminary Questions

1. Has the LDP been prepared in accordance with the requirements of:

a) The approved Delivery Agreement, including the Community Involvement Scheme?

1.1 Yes, the LDP has been prepared in accordance with the Delivery Agreement (DA), including Community Involvement Scheme (CIS). Whilst the initial DA was agreed by the WG on the 28th June 2018, a number of revisions have been made to it during the Plan preparation process. These revisions were required to reflect the impacts of Covid-19 and subsequently the publication of the NRW Guidance on phosphate levels within protected Riverine Special Areas of Conservation (SACs). Revisions were published in November 2020, August 2022, January 2024.

b) The Well-being of Future Generations Act (Wales) (2015)? And

1.2 Yes, the Revised LDP has full regard to the provisions of the Well-being of Future Generations Act (2015), the ensuing seven connected national well-being goals, in addition to those local well-being goals set by the Carmarthenshire Public Service Board and contained within our Corporate Strategy 2022–2027.

1.3 The promotion and recognition of well-being was interwoven into Plan preparation including through the Issues, Vision and Strategic Objectives Topic Paper (latest update February 2023) which assessed the compatibility of the Plans strategic objectives to the local well-being goals. Appendix 6 of the second Deposit Revised LDP links each strategic policy to a strategic objective and the National and Local Well-being Goals. Due consideration to both National and Local Well-being Goals was further embedded within the Integrated Sustainability Appraisal (ISA) Framework. Reference is made to Appendix 2 of the Second Deposit Revised LDP.

c) The Equality Act (2010)?

1.4 Yes, an Equalities Impact Assessment (EqIA) was undertaken at the relevant stages throughout the preparation of the Revised LDP including the Pre-Deposit Preferred Strategy and as part of the first Deposit version of the Plan. The appropriate steps have therefore been taken to comply with the Public Sector Equality Duty

Equality Impact Assessment legislation. The Assessment helps demonstrate that the Council has shown due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the socio-economic Duty. It also ensures consideration of the Welsh Language.

1.5 As part of the preparation of the second Deposit Revised LDP the requirements in relation to the preparation of an EqIA were incorporated into the Integrated Sustainability Appraisal (ISA). Overall, the policies appraised in this present report were predicted to have no likely disproportionate adverse effect upon protected characteristics although specific mitigation measures are explicitly highlighted within the ISA (Appendix I).

2. Has the LDP been subject to a robust Sustainability Appraisal / Strategic Environmental Assessment? Have all of the ‘likely significant environmental effects’ of the Plan and all ‘reasonable alternatives’ been identified, described and evaluated?

2.1 Yes. An Integrated Sustainability Appraisal (ISA) was undertaken to enable a transparent and holistic assessment of the sustainability implications of the second Deposit Revised LDP, and was carried out in an iterative and integrated manner throughout the plan making process. In accordance with various statutory requirements, it features the joint Sustainability Appraisal (SA) Report and Strategic Environmental Assessment (SEA), alongside a Welsh Language Impact Assessment (WLIA), an Equality Impact Assessment (EqIA), elements of a Health Impact Assessment (HIA), Local and National Well-being Goals, and other considerations related to the environment including NRW’s Area Statement and the Section 6 Duty.

2.2 While the entire process is captured within the ISA Report (which incorporate the SA/SEA Environmental Report) as supporting the second Deposit Revised LDP, throughout each stage of the plan’s development measures were suggested to mitigate negative effects and maximise positive ones. Additionally, an associated monitoring framework has been proposed so that any unforeseen adverse effects can be appropriately remediated. Furthermore, an addendum (incorporating focused changes) was later published to ensure procedural compliance, reflect comments received from public and statutory consultees, and respond to a changing socio-

environmental baseline. Overall, it was found that the revised LDP would have significant benefits in terms of securing sustainable development within the County.

3. Has the LDP been subject to a robust Habitats Regulations Assessment? Where 'likely significant environmental effects' have been identified, has an adequate Appropriate Assessment (AA) been undertaken?

3.1 Yes. Over the course of the preparation of the Revised Local Development Plan (LDP), an accompanying Habitats Regulations Assessment (HRA) has been carried out in an iterative, transparent, and integrated manner as part of the plan making process since 2018. All proposals and allocations presented in the Revised LDP have been subject to screening under the requirements of the Habitat Regulations and have been duly considered in terms of their potential impact upon the National Site Network. While the original HRA Report was published for consultation as supporting the first Deposit Revised LDP, this has since been supplemented by two additional addendums – reflecting the need to ensure procedural compliance against the Regulations, particularly in relation to the emerging issue of excess nutrient pollution in protected Riverine Special Areas of Conservation. Mitigation measures were considered as part of a comprehensive Appropriate Assessment, with many of these being embedded within the policies of the Revised LDP. In light of this, the HRA was able to conclude that the Revised LDP will have no adverse effect on the integrity of any National Site Network Site, either alone or in combination with other plans or projects.

4. Have there been any significant changes in national policy or local circumstances since the LDP was placed on deposit? If there have, what are the implications of these changes for the Plan? Do they need to be addressed through the preparation of new evidence and/or revisions to the Plan? What is the intended timescale for this work?

4.1 There have not been many significant changes in national policy or local circumstances since the publication of the second Deposit Revised LDP. However, February 2024 saw the publication of Edition 12 of Planning Policy Wales. This was preceded by a Chief Planning Officer letter dated the 11th of October 2023 in relation to addressing the nature emergency through the planning system: update to Chapter 6 of Planning Policy Wales. The implications will be considered as part of the LDP examination.

4.2 The Noise and Soundscape Plan for Wales 2023-2028 was published for consultation on the 26 June 2023. The outcome of the consultation and the content of the adopted Plan will be monitored including its relation to its relationship on the delivery of placemaking and Green and Blue Infrastructure objectives.

5. Is the LDP strategy consistent/compatible/in conformity with:

a) National policy, guidance and Future Wales: the National Plan 2040?

5.1 Yes, the Revised LDP has been prepared with due reference and regard to National Planning Policy and guidance and is consistent with, and compatible with its content and provisions.

5.2 The Revised LDP is considered to be in general conformity with Future Wales: the National Plan 2040. As part of their representation on the second Deposit Plan, Welsh Government state: 'The Welsh Government is of the opinion that Carmarthenshire's Replacement Local Development Plan (2018-2033) is in general conformity with the Future Wales: the National Plan 2040: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).' This statement of conformity 'is based on what is currently set out in Policy SP4, namely a housing provision of 9,704 homes, a supportive Welsh Language Impact Assessment and the majority of this growth being located in the Tier 1 and Tier 2 settlements.'

5.3 It is however noted that this statement is caveated in relation to issues raised in Annex 2 of their representation letter regarding fundamental inconsistencies with the total housing provision are addressed, and their implications is understood, it is not possible to give a firm view on matters of conformity. Reference is made to the updated Growth and Spatial Distribution Topic Paper (Submission Document CSD75) and the Position Statement - Housing Growth and Spatial Distribution (Submission Document CSD64) which has been amended to reflect and address the issues raised in relation to conformity.

b) The Well-being Goals?

5.4 Yes, the Revised LDP has full regard to the provisions of the Well-being of Future Generations Act (2015), the ensuing seven connected national well-being

goals, in addition to those local well-being goals set by the Carmarthenshire Public Service Board and contained within our Corporate Strategy 2022–2027.

5.5 The promotion and recognition of well-being was interwoven into Plan preparation including through the Issues, Vision and Strategic Objectives Topic Paper (latest update February 2023) which assesses the compatibility of the Plans strategic objectives to the local well-being goals. Appendix 6 of the second Deposit Revised LDP links each strategic policy to a strategic objective and the National and Local Well-being Goals.

5.6 The theme of well-being is also considered through the Integrated Sustainability Appraisal process. Reference is also made to Appendix 2 of the Second Deposit Revised LDP.

c) The Welsh National Marine Plan?

5.7 Yes. The first Welsh National Marine Plan (WNMP) was published by the Welsh Government on the 12th November 2019. It should be noted that the publication date was one day before the publication of the 1st Deposit LDP. Its content has however been considered through the preparation of the 2nd Deposit Plan.

5.8 As part of the Marine and Coastal Access Act (MCAA), the Welsh Government must produce a Marine Plan.

- inshore region (out to 12 nautical miles)
- offshore region (12 to 200 nautical miles)

5.9 The WNMP contains plans and policies which will:

- support our vision for clean, healthy, safe and diverse seas;
- guide future sustainable development;
- support the growth of marine space and natural resources ('blue growth').

5.10 Strategic Policy SP15 (in recognising the fundamental challenges posed by climate change) complements the Marine Plan on matters including flood risk whilst

SP13 and SP11 respond to issues such as adaptability and green infrastructure and connectivity.

d) The relevant Area Statement?

5.11 Yes, In the context set out by the Environment Act, NRW has prepared the South-west Wales Area Statement. The area statement sets out:

- The natural resources in each area and the benefits they provide;
- The key challenges and opportunities at a local level;
- A common evidence base with information, data and evidence.

5.12 The South-west Area Statement identifies the key risks, opportunities, and priorities that we all need to address to build the resilience of our ecosystems and support sustainable management of the natural resources. It should be noted that the initial stages of the Plans preparation including the Pre-Deposit Preferred Strategy and 1st Deposit LDP were prepared prior to the finalisation of the Area Statement. However, the 2nd Deposit has been informed not only by its content but also by the duties under the Environment Act. Specific reference is made to the declaration of the Climate and Nature Emergencies by the Council which the Plan seeks to reflect – this has a clear synergy with the Area Statements themes on reversing the decline of, and enhancing, biodiversity and mitigating and adapting to a changing climate.

5.13 NRW in their response to the second Deposit Plan stated: ‘We support the intent of the plan’s policies and proposals to enable the delivery of sustainable development and ensure social, economic, environmental and cultural well-being goals are all suitably balanced in the decision-making process, so the right development occurs in the right place.’ As part of their specific comments these matters have either been picked up through additional evidencing or will be matters for consideration at examination.

e) If an LDP, the relevant strategic development plan (when adopted)?

5.14 There is currently no Strategic Development Plan (SDP) within the South West Wales region. CJCs have responsibility to undertake the preparation of an SDP and Regional Transport Plan. The preparation of the Revised LDP includes opportunities for collaborative working with neighbouring authorities across the region and includes

the preparation of joint evidence which will potentially inform the preparation of an SDP. In this respect the regions authorities have a track record of collaborative working.

f) Regional plans/strategies and the programmes of utility providers?

5.15 Yes, the Revised LDP was prepared within the context of the relevant regional plans, strategies and utility programmes. These were also considered when preparing the LDP strategic policies, the growth strategy, strategic objectives, spatial strategy and settlement hierarchy. The Revised LDP, associated evidence base and background papers set out how regional plans, strategies and utility programmes have been considered. Proactive engagement has been key to this exercise and the LPA has consulted with a range infrastructure and utility providers throughout plan preparation as detailed in the Infrastructure Assessment Paper (submission document CSD78).

g) The plans/strategies of neighbouring local planning authorities?

5.16 Yes, the Revised LDP has been prepared following ongoing engagement and liaison with all neighbouring LPAs (City and County of Swansea, Neath Port Talbot, Ceredigion, Pembrokeshire, Pembrokeshire Coast National Park Authority, Powys and Bannau Brycheiniog Park Authority) as well as other essential organisations. This dialogue has been conducted both on an individual and topic basis, but also through the South West Wales Strategic Planning Group and other topic-based forums. Appendix 2 of the second Deposit Revised LDP references the current position of neighbouring authorities Plans and these have been considered throughout LDP preparation to ensure compatibility.

5.17 Reference is made to a position paper prepared in conjunction with authorities within the South West Wales Region (Submission Document CSD67).

h) The relevant Well-being Plan or National Park Management Plan?

5.18 Yes, the Revised LDP has full regard to the provisions of the Well-being of Future Generations Act 2015 and to the local well-being Goals.

5.19 The promotion and recognition of well-being was interwoven into Plan preparation including through the Issues, Vision and Strategic Objectives Topic Paper (latest update February 2023) which assesses the compatibility of the Plans strategic objectives to the local well-being goals. Appendix 6 of the second Deposit Revised LDP links each strategic policy to a strategic objective and the National and Local Well-being Goals.

5.20 The theme of well-being is also considered through the Integrated Sustainability Appraisal process. Reference is also made to Appendix 2 of the Second Deposit Revised LDP.

6. Has the LPA exhausted all opportunities for joint working and collaboration on both the preparation of the LDP and its evidence base?

6.1 Yes, The LPA been actively undertaking collaborative working with Neighbouring authorities. This will continue and further develop as appropriate both in relation to the development and implementation of the Revised LDP but also to support regional collaboration and the preparation of the SDP. This collaborative working will also further develop as the authorities within the region and beyond (including other partners continue to further respond to the challenges posed by phosphates in protected Riverine SACs as well as other anticipated nutrient and water quality issues.

6.2 Timing of current LDP adoptions and commencement of replacement Plans across the region has resulted in a lack of alignment on timescales. For instance, Swansea and Neath Port Talbot are in the early stages of their Plan review with Ceredigion having paused plan preparation. In this respect only Pembrokeshire are on a consistent timeline with Carmarthenshire. Where opportunities to commission shared evidence base studies were identified these have been undertaken both across the region but also with individual neighbours – the position paper on regional working and collaboration outlines such work where it has occurred.

7. What is the LDP's spatial strategy? How do the key components of the strategy interact? Does it represent an appropriate approach for delivering, managing and distributing growth over the Plan period?

7.1 Policy SP1 sets out a clear spatial strategy for the future growth of a sustainable economy and housing requirement which helps to realise the Council's core strategic ambitions. It recognises that to deliver this the County's role as a strong and economic driver for growth locally, regionally and nationally places Carmarthenshire at the centre of a prosperous and sustainable Wales. The Plan's strategy for growth is formulated on the basis of sustainable development principles and in accordance with the goals and aspirations of the Well-being of Future Generations Act. The Plan's strategy also reflects Llanelli's significance as part of the Swansea Bay and Llanelli National Growth Area identified in Policy 28 of Future Wales: the National Plan 2040 and Carmarthen as an area for regional growth as identified in Policy 29 – Regional Growth Areas – Carmarthen and the Haven Towns.

7.2 The strategic approach builds on the corporate emphasis on regeneration and the opportunities presented through the City Deal and other regeneration and investment opportunities, whilst also recognising the opportunities presented through the rural economy and diverse needs of communities across the County. The strategy recognises the role employment plays in creating a prosperous County – with appropriate growth of housing with jobs and employment opportunities.

7.3 By ensuring that our housing growth requirements are reflective of, and are in support of our economic ambitions, it allows for a co-ordinated and integrated approach to ensure that the shared role for economic growth is not in isolation of housing and vice a versa.

7.4 This Strategy will seek to distribute growth through a sustainable settlement hierarchy derived from the preferred spatial option (considered in question 8). It recognises the diversity across the County and its rich environmental, biodiversity, natural, and built landscape credentials. In delivering this strategy, it also recognises the role Carmarthenshire's rural areas, and its urban areas contribute to delivering its vision for 'One Carmarthenshire'.

8. How was the LDP's settlement hierarchy defined? Is the methodology used to define the hierarchy clear and rational?

8.1 The development of the LDP's settlement hierarchy has emerged from the consideration of the spatial options and in line but not limited to the well-being objectives, the content of the Review report (Submission Document CSD1) national policy, and through the engagement process notably through the Key Stakeholder Forums (Submission Documents CSD223 and CSD225). The Preferred Option – Balanced Community and Sustainable Growth Strategy seeks to provide a balanced growth centred on the delivery of our communities' needs and the delivery of the region and the Council's and the Council's strategic and regeneration objectives. Furthermore, the creation of the settlement hierarchy is supported by the publication of the Role and Function Topic paper (Submission Document CSD72). This Topic Paper provides an introduction on the population and household composition; and the importance of the Revised LDP against other Corporate and external strategies, which has allowed the Local Authority to understand the role and function those settlements make within the county. The Paper explains the formation and role of tiers and clusters and provides an opportunity to evaluate the existing evidence relating to the settlement hierarchy, and to also consider factors such as scale, capacity, spatial context, local "nuances" and settlement characteristics. The scale and type of growth apportioned to settlements is dependent upon their individual roles, functions and positions within the Settlement Hierarchy. This is to ensure the Revised LDP directs the majority of growth towards areas that already benefit from good infrastructure, services and facilities, or where additional capacity can be provided. The methodology is clear and rational.

9. What is the rationale for the distribution of new development? Is the approach consistent with the National Sustainable Placemaking Outcomes?

9.1 The Revised LDP vision recognises the opportunities the diversity of the County and its communities along with the regeneration ambitions identified through the Swansea Bay City Deal.

9.2 As outlined in the Spatial Options Topic Paper (Submission document CSD69), the Preferred Spatial Strategy is considered the best option to align with the vision. The Spatial Strategy is considered most conducive to accommodating the Growth Strategy and distributing this growth through sustainable patterns of development that accord with Planning Policy Wales' placemaking principles. The Plan will maximise affordable housing delivery in high-need areas (as identified in the Local Housing

Market Assessment) and promote viable sustainable development. It is also acknowledged that market demands influence the delivery of growth and the Plan focuses this growth to established settlements which offer key services and facilities. Reference is drawn to the Plan's conformity with Future Wales, and the Role and Function Topic Paper (Submission document CSD72) has demonstrated that the Revised LDP is in general conformity and supports delivery of the National Sustainable Placemaking Outcomes, providing a sound framework for placemaking-led sustainable development in Carmarthenshire.

10. What was the methodology underlying the site selection process? Are the resultant allocated sites:

- a) In sustainable locations and generally free from physical constraints, such as land ownership, infrastructure, access, ground conditions, flood risk issues, pollution, landscape, biodiversity and heritage designations?**
- b) Attractive to the market (both private and/or public sector) for development, able to accommodate the policy and infrastructure requirements set out in the Plan, viable, and deliverable during the Plan period?**

10.1 The Site Assessment Methodology Paper (Submission Document CSD101) set out a three-stage process for the assessment of candidate sites, and each site set out within the Site Assessment Table (Submission Document CSD103) was considered against a detailed pro forma.

10.2 Stage 1 was a high-level assessment to identify whether each Candidate Site was compatible against the location of future growth presented in the Preferred Strategy. This was consulted upon as part of the Preferred Strategy Consultation.

10.3 Stage 2 of the site assessment was split into two parts:

- Stage 2a sought to identify sites which would have fundamental constraints that could not be overcome or mitigated for. These included 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 were not taken forward to the next stage. In addition, sites which were not

considered able to accommodate five or more dwellings were sieved out at this stage out but were considered against general planning principles as part of the Development Limits Topic Paper (Submission Document Number CSD73).

- Stage 2b was a detailed, site-specific assessment, and included analysis of the sustainability of the site, its viability and the likelihood that it would be developed during the plan period. The pro forma also considered an analysis on biodiversity, highways, impact on the Welsh language, ground condition amongst other criteria.

10.4 For sites taken forward as allocations or considered to be reasonable alternatives, a detailed SA/SEA commentary was carried out to assess them against the ISA Framework, and subsequently taken forward to Stage 3.

10.5 Sites not carried forward within Stage 2b were assessed against the ISA framework through the pro forma.

10.6 Stage 3 then assessed those sites that had proceeded through all previous phases and to be included in the Council's 2nd Deposit LDP. At this stage, a HRA was carried out on each site to ensure that the Deposit plan would have no significant effect (alone and in combination) on European Designated Sites.

11. Will the LDP be supported by supplementary planning guidance? If so, what subjects will be addressed? What are the timescales for the adoption of the guidance? How will it assist in the delivery of the Plan?

11.1 Yes, the Revised LDP will be completed by a collection of Supplementary Planning Guidance (SPG). Two SPGs have been published for formal consultation and subsequently approved for adoption during preparation of the Plan. These are as follows:

- Burry Inlet SPG
- Caeau Mynydd Mawr SPG

11.2 These and those listed below will be supplemented by additional SPGs, which will be prepared leading up to LDP adoption and during the Plan period. This list of SPG and the timescales for their preparation can be viewed within Appendix 3 of the

second Deposit Revised Plan (NB: This list is not exhaustive and the timescales will be updated to reflect the revised timetable for the preparation of the Plan). A further eight SPG are currently scheduled for preparation and consultation prior to the adoption of Revised Plan. These are:

- Welsh Language;
- Sites of Importance for Nature Conservation;
- Securing Public Open Space within New Developments;
- Plastering, Rendering & Insulating Traditional Buildings: Guidance for Sustainability;
- Carmarthenshire Shop Front Design Guide;
- Carmarthenshire Conservation Area Management Guidance;
- Landscape Character Assessment; and
- Provision of Green and Blue Infrastructure within New Developments.

11.3 The SPG will be prepared to provide further detail on certain policies and proposals and to support the interpretation and implementation of the Plan.

11.4 It is noted that SPG do not have the same status or weight as adopted Development Plan policies. However, they may be taken into account as a material consideration in determining planning applications. Reference is made to the position statement prepared in relation to SPG (submission document CSD66).

12. What is the LDP's strategy for the provision of housing? Is it appropriate to meet the needs of the area over the Plan period?

12.1 Policy SP1 sets out the housing growth provision for the Plan period. This is supplemented by the Role and Function Paper (Submission Document CSD72), the Growth and Spatial Distribution Topic Paper (Submission Documents CSD74 and CSD75) and the adherence to National Policy by steering new housing growth to sustainable centres. Reference is made to the tier and cluster approach as set out in Chapter 10 of the Deposit Revised LDP.

13. What is the LDP's Housing Requirement Figure (HRF)? How has it been calculated?

13.1 The LDP's housing requirement figure is 8,882 dwellings during the 15-year LDP period, and equivalent to 588 dwellings per year. This would allow for new homes to be provided in a sustainable manner which supports the aspirations of our communities and provides appropriate flexibility to respond to the Council's affordable housing objectives.

13.2 In considering the future growth potential for Carmarthenshire, Turley identified several different demographic and economic scenarios which could be utilised for the period 2018-2033. (Submission Document CSD34). This responded to the LDP Manual by considering demographics, past trends and policy-based factors, as well as the relationship with the local economy.

13.3 In summarising the growth scenarios within the Plan, only two of the scenarios provided a balanced household growth to support the Local Authority's favoured Strategic Growth Option. Whilst supportive of the Council overall strategic aims, the fifteen-year projection sought a level of housing completions which would not align with current build rates; however, the ten years trend-based projection sought a lower level of housing growth which aligned better with the revised LDP strategy as a whole.

13.4 The Population and Household Projection Topic Paper (Submission Document CSD70) sets out the rationale of the Local Authority.

14. In defining the HRF, was adequate regard paid to the latest household and population projections? Was consideration given to the main local influences on housing demand in the area (including household formation rates, migration levels, and household conversion ratios etc)?

14.1 Yes, the latest household and population projections were analysed in combination with more recent data from Mid-Year Estimates and a broad range of historical demographic scenarios, with varying migration assumptions.

14.2 The evidence to define the HRF has been through three iterations since the start of the Revised LDP process. At the time of the publication of the Deposit LDP in February 2023 the latest official projections available from the Welsh Government were based to 2018, with variant demographic scenarios emanating from this base data, including assumptions on higher and lower fertility and mortality.

14.3 The Housing and Economic Growth Paper (Submission Document CSD34) identified the need to re-base the principal projections to consider the additional 2 years of known data and the 10yr trend-based projection was identified as the most suitable scenario and would allow the flexibility to drive sustainable housing growth and contribute to supporting the economic ambitions of the county.

14.4 In respect to the household conversion rate, the 2011 Census data was relatively dated at the time of writing – pending the release of data from the 2021 Census, but with the availability of more up-to-date Council Tax data, it made it reasonable to derive a vacancy rate of 3.8% and this has been applied and fixed throughout the forecast period.

15. Were alternative housing growth scenarios considered? If so, what alternative scenarios were they, why were they discounted, and why was the preferred option selected?

15.1 At Preferred Strategy stage, a range of demographic scenarios were initially analysed to inform the growth options. This was utilised by using the WG 2014-based projections. The detail of each scenario and the assumptions underpinning these scenarios were considered within the 2018 Edge Analytics report.

15.2 Further evidential work was undertaken as part of the 1st Deposit Revised LDP through the 2019 Edge Analytics Report. The analysis of the re-configured POPGROUP scenarios was preceded by an updated demographic profile of Carmarthenshire. This incorporated the latest components of population change (births, deaths and migration), historical patterns of international and internal migration, in addition to housing completion statistics and an updated analysis of the county's age profile.

15.3 As discussed in Question 14, the Housing and Economic Growth Paper (Submission Document CSD34) updates the range of demographic scenarios and utilises the 2018 WG based projections with a further 2 years of estimated data. This forms the basis of Chapter 8 of the second Deposit Revised LDP, and the growth option set out within the plan. This updated scenario discounts earlier iterations of alternative growth scenarios give that they became out of date and provides a more realistic picture of Carmarthenshire's growth.

15.4 It is demonstrated that the preferred option is realistic and deliverable when benchmarked against past delivery rates and supports the main economic and regeneration aspiration for the County.

16. What is the LDP's housing land supply figure and how has it been calculated?

16.1 The housing land requirement figure is 8,822 for the period 2018-2033. In delivering the number of homes set above the Plan, it incorporates an appropriate level of flexibility to ensure delivery of the Anticipated Annual Build Rate (AABR) throughout the plan period. This flexibility is set at 10% flexibility and therefore is calculated as 882 additional dwellings. This flexibility ingrained into the supply (uplift) ensures the delivery of sustainable growth and to overcome any potential unforeseen deliverability issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered.

16.2 Reference should be made to the updated Growth and Spatial Distribution Paper and position paper in consideration of the flexibility applied. (Submission Documents CSD75 and CSD64 respectively).

17. Is the housing trajectory set out in the LDP realistic?

17.1 Yes, the housing trajectory is the result of site-specific phasing analysis. The forecast completions on sites have been prepared through dialogue with site owners and developers, and where this has been unavailable by using information available in terms of planning application data and local knowledge. Reference is also made to development timescales set out in Statement of Common Grounds for key sites which may differ from those highlighted within the most recent housing trajectory. Any changes will be reflected in an updated trajectory based to 31st March 2024 which will be presented at examination.

18. What is the LDP's strategy for the provision of affordable housing? Has it been informed by a reliable and up-to-date market assessment (LHMA)? What scale, tenure and type of housing need was identified and how will this need be met over the Plan period?

18.1 In assessing the need for affordable dwellings, regard is given to the most up to date Carmarthenshire Local Housing Market Assessment (LHMA), whilst the development of an updated 2024 Assessment is to be concluded in the Summer of 2024. The Local Authority's timeline and consideration for the 2024 LHMA is set out within the LHMA Position Statement which forms part of the submission documents.

18.2 The 2019 LHMA identifies a 76% / 24% split in the requirement of households requiring market housing and those households requiring affordable housing. For the benefit of the LHMA, the County has been split into 4 Affordable Housing Action Areas, and a significant proportion of the number of the households requiring affordable housing fall within the Llanelli Action Area (47%). The LHMA also identifies the type and size of the housing required throughout the County, with Llanelli having a consistent spread of need across 1-, 2- and 3-bedroom homes. In general, across the other Action Areas, the county requires the development of 2-bed and 3-bed housing to meet the affordable need. In analysing this data, there is a strong correlation between the location of affordable housing need and the distribution of proposed housing growth set out within the LDP strategy and settlement framework.

18.3 Whilst the LDP and planning system seeks to support the delivery of affordable homes, it is only one of few mechanisms used to meet this need. This is reflected in the Council's Affordable Housing Delivery Plan (submission documents CSD39a and CSD39b) which sets out the vision for delivering affordable housing. The LDP's contribution to the target is set out in SP5 through:

- On-site provision of affordable housing as a percentage of the overall development, or on sites acquired by social housing providers;
- Off-site affordable housing in lieu of on-site provision;
- Commuted sum contributions to support the delivery of affordable housing; and
- Local Need Housing.

18.4 Reference is also made to the Carmarthenshire Rural Needs Study 2019 (Submission Document CSD37) which identifies a higher proportion of larger dwellings within the rural areas and that contribute to higher house prices. The LDP looks to support the growth of more affordable units within the rural communities to promote development for first time buyers or those in low-income households.

19. What is the LDP's affordable housing target? How was it calculated? Does it maximise the opportunities for delivery?

19.1 During the plan period, development proposals within the Revised LDP are expected to deliver a total of 1,900 affordable dwellings across the County. This target has been calculated by the following methods:

- The affordable dwellings completed on sites since the LDP base date;
- The affordable dwelling numbers granted planning permission on planning applications;
- Calculating the potential affordable housing contribution from outline planning permissions where a percentage target is determined in S106 agreements;
- For new revised LDP allocations, the proposed percentage targets set out within policy AHOM1 is measured against the indicative housing numbers set out in Policy HOM1; and
- Considering site specific contributions through identifying 100% affordable sites.

19.2 For the above calculation reference is drawn to the housing allocation list in Policy HOM1 which indicates the potential provision from the allocated housing sites.

19.3 In addition to the above, an allowance for affordable housing is made from large windfall sites. This is based on sites currently adopted in the LDP 2006-2021, but not taken forward as allocations in the Revised LDP.

19.4 Lastly the Annual Monitoring Reports have identified the completion of local need, key worker, or One Planet Developments. These completion figures have been averaged to account for the remaining period in the Plan and is added to the overall County wide target in Policy SP5. In conclusion, the Local Authority has tried to maximise its ability to provide affordable homes through the land use planning system.

20. Will the LDP's affordable housing target meet the need for social rented and intermediate accommodation identified in the LHMA? If not, how will this need be met over the Plan period?

20.1 The LDP's affordable housing target will meet over 82% of the affordable housing need identified within the LHMA. As confirmed in National Guidance, it must

be recognised that the need identified in the LHMA represents the scale of the affordability gap in the market and the LDP itself is not the only affordable housing delivery mechanism to help address it. The Plan's contribution will form part of several streams of affordable housing supply to meet this identified need, including Social Housing Grant and other capital/revenue grant funded schemes, Registered Social Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties. Reference should be had to the position statement in relation to the LHMA (Submission Document CSD65

21. How have the LDP's site-specific affordable housing target(s) been defined? In which geographical locations will the target(s) apply?

21.1 The Financial Viability Assessments (Submission Documents CSD31 and CSD32) respond to the guidance in the Development Plans Manual, which requires a Local Planning Authority (LPA) to undertake a high-level viability appraisal to assess the broad levels of development viability in different housing market areas, which could result in a range of affordable housing percentages being sought across the LPA area.

21.2 The Study has drawn on market evidence of house prices from a range of development sites across Carmarthenshire. For development costs, the Study relies on a series of Viability Study Group sessions that have taken place; evidence from viability assessments that have been undertaken for specific Development Management cases; as well as data from the Building Cost Information Service (BCIS).

21.3 For any development proposal to be "financially viable", it must be demonstrated that it is capable of delivering a competitive, market risk adjusted return to a developer; and a land value that is sufficient to encourage a landowner to sell for the proposed use. The Study relies on a combination of market evidence, settled viability cases and engagement with industry stakeholders.

21.4 In the consideration of site-specific targets, these are not considered on a geographical basis but by the site size. This is evidenced through the Financial Viability Assessment and further considered in Question 22 below.

22. How were the affordable housing site thresholds defined? Have they been informed by robust, proportionate and credible evidence?

22.1 The affordable housing policies that consider on-site contributions are applicable to sites of ten units or more. This threshold was established by the FVA study.

22.2 The main conclusion reached is that it should be viable for market led residential developments to deliver the following percentages of affordable housing on sites of 10 or more and as part of the overall mix of dwelling types and tenures:

- On sites comprising 10 – 19 homes, 10% should be delivered as affordable homes;
- On sites comprising 20 – 50 homes, 12% should be delivered as affordable homes;
- On sites of 51 – 100 homes, 20% should be delivered as affordable homes; and
- On sites of more than 100 homes; 25% should be delivered as affordable homes.

22.3 The FVA Study also found that, in general, it is no longer realistic to expect new developments of less than 10 dwellings to deliver affordable housing on site. All smaller developments in this category should, however, be able to make a financial contribution towards off-site delivery of affordable homes, calculated in accordance with the Council's current Affordable Housing SPG.

22.4 The Local Authority has undertaken an update to the FVA in 2024 which looks to update some of the assumptions within the affordable house values within the Affordable Housing Action Areas. These new figures suggest that the affordable housing targets set out in policy AHOM1 of the Revised LDP can be met. Reference is drawn to submission documents CSD31 and CSD32

23. How will off-site contributions be used to deliver affordable housing?

23.1 Off-site contributions towards affordable housing will be required from proposals comprising 1 – 9 dwellings and will be charged based on their floorspace (cost per sq m). However, proposals for single dwellings categorised as 3-bed, 4-

person dwellings or smaller, and less than 88 square metres will be exempt in accordance with Policy AHOM1.

23.2 Supplementary Planning Guidance on affordable housing will be prepared to support the LDP's policies and will provide further guidance on how the contributions should be spent. This will include guidance relating to a sequential approach to ensure that the contributions are spent within the same settlement wherever possible.

24. What is the LDP's strategy for the provision of Gypsy and Traveller accommodation? Has it been informed by a Gypsy and Travellers Accommodation Assessment (GTAA)? Does the GTAA identify a need for new pitches (permanent and transit) over the Plan period? How will the need be met?

24.1 The Local Authority undertook a GTAA in 2019 which identified the current and future provision of gypsy and traveller pitches within the County. The additional pitch need was considered for three-time periods.

Gypsies and travellers as of 2019:

- Unmet need: 19 pitches
- Likely unmet need in 5 years: 23 pitches
- Likely unmet need in 2033: 31 pitches

Travelling Show People - Additional pitch needs as of 2019

- Unmet need now: 4 pitches
- Likely unmet need in 5 years: 4 pitches
- Likely unmet need in 2033: 6 pitches

24.2 The 2019 GTANA did not highlight any evidence in terms of a clear pattern of encampments and the subsequent bi-annual caravan counts have not identified any need for a transit site within Carmarthenshire. The was GTANA was submitted to WG, however no further feedback has been received to date. The Revised LDP however has allocated two new sites within the Plan to meet this identified need and these sites will be considered during the examination process.

24.3 In relation to an updated 2024 GTAA, the Local Authority has published a Position Statement (Submission document CSD63) to consider its approach on the process of undertaking an updated 2024 GTAA, however the methodology of undertaking one has not been agreed by WG.

25. What is the LDP's strategy for employment? Has it been informed by an employment land review? Is it consistent with the requirements of national policy? And has it had regard to the key drivers for change in the employment market?

25.1 The employment strategy and associated evidence base has been prepared in accordance with the Welsh Government Practice Guidance 'Building an Economic Development Evidence Base to Support a Local Development Plan' (2015). This guidance advises that data should be collected at 2 levels - local and larger than local.

25.2 At the local level, the Authority commissioned consultants to undertake a Housing and Economic Growth Study specifically to provide evidence to feed into the preparation of the Second Deposit Revised LDP.

25.3 At the 'larger than local' level, the Authority (with Pembrokeshire County Council) commissioned consultants to carry out the *Two County Economic Study for Pembrokeshire and Carmarthenshire* (Submission Document CSD41 and the *Housing and Economic Growth Report* (Submission Document CSD34).

25.4 Local level employment review work is also carried out on an annual basis in-house, the latest is the *Employment Land Review 2023* (Submission Document CSD97). The LDP strategy for employment has been informed by these various pieces of work.

25.5 The Two County Study established quantitative analysis of forecast demand for employment sites at the larger than local level and was supplemented by market and employer evidence in relation to market demand. The Housing and Economic Growth Study further established the links between equating the levels of employment land and jobs with the requirement for new homes growth for the County.

25.6 Consequently, Strategic Policy SP7: Employment and the Economy sets the framework to enable delivery of a balanced level of employment land to accommodate

the new jobs and identified through the above studies. This is considered an unrestrictive and positive approach to ensure that a range and mix of site types are available across the County up until 2033, providing plentiful scope for continued investment without frustrating housing supply.

25.7 Achieving a wide and balanced portfolio of employment uses is central to the economic strategy. This will allow the local economy to attract higher value-added intensive employment uses including, life sciences, construction, energy and decarbonisation, and telecommunications sectors. This is in addition to supporting and maintaining the significant manufacturing base and traditional B class uses that are an important facet and driver of growth for the local economy, now and in the future.

25.8 The underlying projection promotes sustainable forms of growth that will help minimise the need for out-commuting and promote more self-contained, inter-connected communities in accordance with the LDP Vision. This level of growth is considered most conducive to achieving an equilibrium between the number of homes provided and the job opportunities expected (in conformity with PPW).

26. Does the LDP allocate land for new employment development? If so, how has the requirement been defined? Have the allocated sites been subject to a sequential search?

26.1 Strategic Policy SP7: Employment and the Economy allocates 71.21 hectares of new employment land over the Plan period to 2033.

26.2 The employment land requirement has been informed and defined by the various studies highlighted in question 25 above.

26.3 TAN 23 considers that 'land provision targets may be higher than anticipated demand, to allow for the chance to meet demand.' The Practice Guidance to the TAN (August 2015) considers that, where justified, land provision targets maybe higher than anticipated demand, to allow for the chance that the assessments are too low and to ensure that no opportunities are missed. In acknowledging the importance of not solely relying on employment forecasts when identifying a portfolio of employment land, the Two County Study emphasises the demand and confidence of indigenous businesses to remain and grow, and a desire by stakeholders to preserve locational advantages and strategic assets for future growth.

26.4 Opportunities for economic growth will be facilitated by directing employment generating development to the most appropriate and sustainable locations, often supporting the expansion of existing businesses and ensuring strong spatial alignment between housing and employment growth.

26.5 The employment land requirement has been informed by the demographic projections that underpin the Revised LDP to ensure alignment with the housing requirement.

26.6 Coupled with the findings of the *Two County Study*, the economic consequences of the projected increase in job numbers set out in the Housing and Economic Growth Study is considered sufficient for the Revised LDP and will ensure the local economy is not constrained.

26.7 The allocated sites have been subject to a sequential search. All existing employment allocations [in the adopted LDP] were considered as potential rollover sites and thus subject to the same assessment against sustainability and environmental criteria alongside all new candidate sites. The identification of potential constraints through this assessment informed the suitability of the proposed employment sites portfolio.

26.8 A close liaison has been maintained with the Economic Development Division in the preparation of the LDP and in the evolving employment land portfolio. Many of the proposed sites are strategic in nature, have corporate backing and are seen as vital to the anticipated economic growth of the County. Furthermore, some of the sites already benefit from planning permissions and / or masterplans.

27. Will the LDP provide protection for existing employment sites? If so, what protection will be afforded, and how have the sites been selected?

27.1 The established existing employment sites form an important contribution to the County's economic base and have been identified on the LDP Proposals Map. These sites are monitored on an annual basis in the Employment Land Review (ELR). In the last ELR, published in October 2023, the existing employment sites in the County amounted to 457ha. A detailed assessment of existing employment land was carried out as part of preparation for the Revised LDP; this saw a rationalisation and revisions to identified site areas where necessary.

27.2 The importance of the existing employment portfolio in contributing to the County's economic base and helping to maintain a sustainable level of employment land was emphasised in the Two Counties Economic Study, which recommended that such sites be safeguarded.

27.3 The safeguarding of existing sites and premises will help meet the employment needs of the local and wider economy. The annual ELRs have evidenced the continued use and turnover of such sites through the intensification and refurbishment of sites and premises.

27.4 Policy *EME1: Employment – Safeguarding of Employment Sites* acknowledges the existence of these employment areas and seeks to protect their use in the future for employment purposes. Furthermore, Policy *EME2: Employment – Extensions and Intensification* permits the extension or intensification of employment uses on existing sites; this is especially relevant for any such sites or premises which are underutilised, vacant, or in decline.

28. What is the LDP's strategy for retail development? Does it take into account the envisaged growth in other sectors, particularly housing and employment, over the Plan period?

28.1 The LDP's retail strategy reflects the social, economic and environmental principles of sustainable development which underpins the Plan. It seeks to reflect the changing nature of retailing and the need for traditional town centres to adapt to such changes. The Strategy seeks to protect and enhance the roles of the retail centres to ensure their continued attractiveness as town centres, shopping, commercial and leisure destinations and to protect local retail provision established in the county as well as the local businesses behind them. It also seeks to locate and guide retail provision to sustainable locations which are accessible by public transport or active travel routes in order to minimise the need for travel. To this end, the retail strategy aligns with the LDP's growth and spatial strategies identifying retail and commercial centres in locations which are most accessible to the current population and areas identified for growth and development in the revised LDP.

28.2 Policy SP2 Retail and Town Centres sets out the retail hierarchy for the Revised LDP and identifies the town centres within the County as High, Mid or Lower Order

Town Centres. The policy seeks to recognise the general pattern of provision in a traditional hierarchy of centres ranging from the small, localised provision through to the larger centres providing a greater choice over a wider product range. The larger centres also act as locations for related activities in the leisure and entertainment sphere including cinemas and restaurants etc. and for commercial office uses including solicitors, accountants, and estate agents etc. These centres are identified and categorised based on their accessibility to the local population and the scale and diversity of uses present.

28.3 In general, local provision represents goods and services required on a day-to-day basis (convenience items) and for which residents may make short journeys frequently, whilst the larger centres not only provide such facilities, but also more specialised items (comparison goods) sought less frequently and for which shoppers are prepared to travel further.

28.4 Traditionally, shopping provision has evolved in a hierarchy of centres with overlapping catchments reflecting their size and importance. It is this pattern of retail provision which characterises Carmarthenshire with the traditionally larger centres of Carmarthen, Llanelli and Ammanford historically serving larger catchment areas with a broad and specialised range of goods and items.

28.5 In defining a retail hierarchy, regard has been given to the respective roles and functions of the larger towns and small villages. In this respect it is acknowledged that whilst the range of shopping provision throughout the hierarchy plays an essential role, the Principal Centres of Carmarthen, Llanelli and Ammanford, provide the focus of town centre-based retail activity. These centres are the primary non-food comparison shopping destinations and cater for main and bulk food and grocery shopping. Other smaller town centres have a limited range and choice of comparison goods shopping and cater primarily for top-up food and grocery shopping. The policy, however, also seeks to recognise the impact of Covid-19 and change shopping patterns has had on our high streets and town centres. In this respect, the policy seeks to reflect their intrinsic retail function whilst recognising a new multifunctional role for such centres.

28.6 The Updated Retail Study (2023) for Carmarthenshire (Submission Document number CSD99) examines retail, leisure and town centre issues across the County

and assessed the capacity for growth across the retail, food/beverage, and commercial leisure sectors. It is prepared to provide evidence in respect of policy formulation and to inform the identification of a retail hierarchy for the Plan area to guide decision making, as required by PPW. Consequently, the "town centres first" principle in tandem with a sequential approach to the selection of sites will be used to promote town centres as the principal locations for new retail, office, leisure and health facilities.

29. What is the LDP's strategy/policy framework for the following areas:

a) Welsh language

29.1 The 2021 Census indicates that 17.8% of the Welsh population can speak Welsh, whilst the correlating figure for Carmarthenshire is 39.9%. In terms of the geographical breakdown of the proportion of speakers across the County, this is lowest in the Tyisha Ward where 18.9% speak Welsh, and the highest in Pontyberem where 60.7% speak Welsh. The proportion of Welsh speakers is higher than the national average across each ward in the County.

29.2 The Revised LDP recognises the importance of the Welsh language in Carmarthenshire and the part it plays in the population's day to day lives. It contributes significantly to the County's cultural character and identity and to reflect its importance, the Welsh language is a prevalent theme throughout the plan underpinned by Strategic Objective 11 which aims '*To assist in protecting, enhancing and promoting the Welsh Language and the County's unique cultural identity, assets and social fabric*'.

29.3 As embedded within the Integrated Sustainability Appraisal, a dedicated Welsh Language Impact Assessment was also undertaken to assess the Plan's anticipated impacts upon the Welsh language (see Appendix H). The assessment sets out a methodology for assessing impact based upon 2 main considerations – the magnitude of the impact / consequences over the plan period and also the likelihood of that impact or consequence occurring. This method for assessing impact was utilised to consider the anticipated impacts of the Second Deposit revised LDP, looking specifically at the growth and spatial strategies and the policies. In applying this methodology to the assessment, consideration is given to the wider context looking holistically at factors

and other influences on the Welsh language in Carmarthenshire and how they may affect the language within the lifetime of the Plan.

29.4 Policy SP8 Welsh Language and Culture notes that the Plan will support proposals which safeguard, promote and enhance the interests of the Welsh language in Carmarthenshire. It identifies the entire county as an area of linguistic sensitivity given the prevalence of Welsh speakers within it and the important role it could play to support meeting Welsh Government's target of creating a million Welsh speakers by 2050.

29.5 Further policy guidance is contained in specific policy WL1 Welsh Language and New Developments to aid in the delivery of the Plan's strategic objectives and to support policy implementation at the planning application stage. A draft Supplementary Planning Guidance has also been prepared to support the implementation of these policies.

b) Air quality

29.6 Air quality and its environmental, health and quality of life implications are recognised through national guidance. This is also reflected within the Revised Local Development Plan and its effectiveness in this area has been assessed against the ISA and the HRA. Many of the policies within the Plan are predicted to have a positive impact on Air Quality, with the following predicted to have a major positive effect:

- PSD3: Green and Blue Infrastructure Network;
- PSD4: Green and Blue Infrastructure – Trees, Woodlands and Hedgerows;
- INF2: Healthy Communities;
- PSD12: Light and Air Pollution;
- Strategic Policy – SP 14: Maintaining and Enhancing the Natural Environment;
- Policy CCH3: Electric Vehicle Charging Points; and
- CCH7: Climate Change – Forest, Woodland, and Tree Planting.

29.7 The above strategic and general policies provide a supportive framework to focus on environmental sustainability, reduce exposure to poor air quality, protect and improve air quality and safeguard residential and community amenity.

29.8 There are three designated Air Quality Management Areas (AQMAs) in the County (Llandeilo, Llanelli, and Carmarthen). Reference may be made to the Council's Action Plan(s), whilst the boundaries of these AQMA's are shown on the Plan's Constraints Map.

29.9 Developers should be aware of the importance of early engagement with the Council, particularly in terms of the potential requirement for the undertaking of an Air Quality Assessment. Whilst the Plan is not prescriptive in relation to the instances that such an assessment will be required, it is considered that the scale and location of the proposal are key determinants in this regard. Any Air Quality Assessment should highlight the required mitigation so that any risks to amenity, biodiversity and health are suitably mediated. The identification of such mitigation should seek to reflect the opportunities provided by green and blue infrastructure as part of a placemaking approach. Reference should be made to Policy PSD3: Green and Blue Infrastructure Networks.

c) Biodiversity & Ecological Networks

29.10 Carmarthenshire has a rich and diverse natural environment with several designated sites and protected species. Strategic Policy SP14 seeks to recognise the quality and value of the natural environment and landscapes across the Plan area, and their fundamental role in defining the County's identity, character, and distinctiveness. The recognition of the considerable merits of green and blue infrastructure for mitigating the effects of climate change, for capturing and storing carbon and for maintaining and enhancing biodiversity and ecological networks is implicit.

29.11 The protection and enhancement of biodiversity and ecology forms an important component of the LDP Strategy, which looks to reflect not only those international and national designations, but also the contribution of sites and landscapes at the local level. The protection and enhancement of ecological connectivity, and the contribution it makes to the quality of Carmarthenshire's

landscape, natural environment and biodiversity is an important consideration of this policy.

29.12 Policies NE2 and NE3 further safeguard biodiversity and ecology and seek to ensure that the habitats and species identified within Section 7 of the Environment (Wales) Act 2016 (as well as ecological corridors, networks, and features of distinctiveness) are suitably protected from harmful development and that the Council fulfils its obligation to maintain and enhance biodiversity and promote ecosystem resilience. Additionally, with its relation to aquatic biodiversity, the protection of water quality and water resources has also been key considerations when developing the Plan's policy framework, particularly in light of phosphate guidance. Culminating in CCH4, the Plan's approach to phosphates is summarised within the associated topic paper.

29.13 A dedicated Green and Blue Infrastructure (GBI) Assessment has also been prepared to help safeguard and influence the implementation of GBI networks within the Local Planning Authority area. Together with aforementioned policies, it establishes the foundation for a proactive and holistic approach to the sustainable management of natural resources. In order to encourage the use of GBI in land-use planning, design, and management, supplementary planning guidance on PSD4 will also be produced. This will make it possible to guarantee that all plans for development include multifunctional GBI as a crucial and important component, in alignment with PPW12. Furthermore, reference is also made to the relevant topic paper which sets the Plan's policy framework for the protection of soil resources.

d) The Historic Environment

29.14 Carmarthenshire has a rich and diverse historical and cultural built heritage with a range of Conservation Areas, Listed Buildings, and Scheduled Monuments. The recognition of the Plan area's built heritage and its conservation is essential in providing a sense of history, character, and a sense of place. Strategic Policy SP15 has been prepared in accordance with PPW (Chapter 6), and TAN 24, which provides specific guidance on how the historic environment should be considered during plan preparation and decision making on planning and listed building applications.

29.15 The County's historic buildings, townscape and landscape should be regarded as assets and positively conserved and enhanced for the benefit of residents and visitors alike. These are not only affected by change and neglect, but also by changes to their setting. As such, this is an important consideration in making decisions on proposals which may have an effect.

29.16 Policy BHE1 requires that proposals in respect of listed buildings and conservation areas will only be permitted where they accord with specific criteria that seek to preserve or enhance their special architectural character and historic interest. New developments in conservation areas should be of a high standard of design which responds to the area's special characteristics and features.

e) Minerals

29.17 The minerals policies within the Plan have been written to accord with national policy, namely Planning Policy Wales (PPW) and the Minerals Technical Advice Notes (MTANs) - MTAN1: Aggregates and MTAN2: Coal.

29.18 Strategic Policy SP18: Mineral Resources is the strategic policy for minerals within the Plan and includes all of the main elements of minerals planning within an all-embracing policy. Three further policies deal with more specific topics areas including Minerals Proposals, Buffer Zones and Mineral Safeguarding Areas.

29.19 The Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties– Second Review (RTS2) (September 2020) sets out the contribution that each constituent local authority should make towards meeting the regional demand for aggregates (both crushed rock, and sand and gravel).

29.20 For crushed rock, Carmarthenshire forms part of the Swansea City Sub-region, along with the local authorities of Swansea and Neath Port Talbot. Although at present, Swansea is unable to demonstrate an inability to meet RTS2 apportionments, there are more than sufficient reserves within NPT and Carmarthenshire to take up the joint apportionment within this period without resulting in under provision. A statement of sub-regional collaboration (SSRC) has been produced which demonstrates how the constituent Authorities satisfy the requirements of RTS2 in respect of future crushed rock provision.

29.21 In terms of sand and gravel provision, it must be noted that the First Review of the RTS (RTS1) suggested that there would be merit in developing a combined approach to future apportionments and allocations between Pembrokeshire, Ceredigion and Carmarthenshire. Although Carmarthenshire is in a separate sub-region (primarily because of the market for crushed rock in the Swansea area), it is recommended in RTS2 that these joint working arrangements [suggested in RTS1] should continue, with regard to sand & gravel. Therefore, a joint approach is being pursued by Pembrokeshire, Ceredigion and Carmarthenshire for the provision of the allocation requirement for 3.626 million tonnes over the period up to 2038. Reference is made to the Position Statement setting out the

29.22 In the event that the allocations for sand and gravel in the three constituent authorities are not sufficient to meet the 3.626 million tonnes over the period up to 2038, an 'area of search' for sand and gravel has been identified on the proposals map (with further areas being identified by Pembrokeshire and Ceredigion in their respective Revised LDPs). Furthermore, a statement of sub-regional collaboration (SSRC) is being produced which will demonstrate how the constituent Authorities will satisfy the requirements of RTS2 in respect of future sand and gravel provision. Reference is made to an interim Position Statement for the Sub-Regional Collaboration (Submission Document CSD67).

29.23 Reference is made to the Topic Paper on Minerals for further background information on this topic area (Submission Document CSD84).

f) Waste management

29.24 The waste policies within the Plan have been written to accord with national policy, namely Planning Policy Wales (PPW) and Technical Advice Note (TAN) 21: Waste. and the WPMR.

29.25 Strategic Policy SP19: Sustainable Waste Management is the strategic policy for waste within the Plan and includes the provisions needed to facilitate the sustainable management of waste. Three further policies deal with more specific topics areas, including waste management provision in new development, landfill proposals, and the disposal of inert waste on agricultural land.

29.26 Planning issues which must be considered when preparing applications for waste developments are set out within Annex C of TAN 21. Furthermore, when assessing proposals for all types of waste management facilities, applications will need to demonstrate how the proposal will contribute towards meeting the objectives in the National Waste Strategy *Towards Zero Waste* and the Collections, Infrastructure and Markets Sector Plan (CIMSP). A Waste Planning Assessment (WPA) should be submitted with all applications for a waste facility classified as a disposal, recovery, or recycling facility. The WPA should be appropriate and proportionate to the nature, size and scale of the development proposed.

29.27 Regional working, involving several local authorities, is vital in the planning for waste management. TAN21 sets out the regional groupings and the need for a Lead Authority to produce an annual Waste Management Monitoring Report (WPMR). The WPMR is an important piece of evidence which sets out the regional need [or lack of need] for residual waste treatment facilities. Carmarthenshire forms part of the Mid and South West Wales region (along with Powys, Swansea, Neath Port Talbot, Pembrokeshire, and Ceredigion). The WPMR is a material planning consideration in the consideration of proposals for new residual waste treatment facilities in the region.

g) Renewable and low carbon energy

29.28 Strategic Policy 16: Climate Change seeks to ensure that proposals consider their impact on the climate. Policies SP16, CCH1: Renewable Energy with Pre-Assessed Areas and Local Search Areas, and CCH2: Renewable Energy Outside Pre-Assessed Areas and Local Search Area will support the delivery of renewable and low carbon energy in the Plan's area in a manner consistent with PPW. The policies work together to ensure that new developments incorporate appropriate climate responsive design solutions and support appropriate renewable energy schemes.

29.29 A Renewable Energy Assessment was undertaken to inform and evidence policies CCH1 & CCH2 which identified the potential for renewable energy generation within the area.

h) Transport, and

29.30 Strategic Policy SP12: Placemaking and Sustainable Places emphasises the importance of effective transport links in creating effective and sustainable places.

29.31 SP12 requires that all developments should contribute to or create opportunities for Active Travel and facilitate access to public transport. It also states that all new developments should be accessible and integrated allowing permeability and ease of movement which promotes the interests of pedestrians, cyclists and public transport which ensures ease of access for all. This will promote less use of the private car by ensuring that the principles of active travel are a credible and more attractive alternative. This will allow for the needed shift away from unsustainable transportation and create healthier lifestyles for residents whilst also reducing the impact of transport-based emissions.

i) Planning obligations.

29.32 Planning Obligations will be used where necessary to ensure that the effects of development are fully addressed to make development acceptable (Policy INF1 Planning Obligations). The Plan requires contributions to deliver or fund improvements to infrastructure, community facilities and other services and facilities to policy requirements or impacts arising from new developments. The planning obligations required will be considered on a case-by-case basis subject to the nature of the proposal and the requirements emerging from it. There may be instances where all required obligations cannot be secured due to their impact upon the scheme's financial viability. In such cases, the infrastructural priorities for that site will need to be identified. Whilst the priorities can vary according to the specific needs of each site and their communities it should be noted that the requirements of Policy NE4 Development within the Caeau Mynydd Mawr SPG Area will be prioritised above other contributions in respect of sites within the SPG Area, in accordance with the recommendations made within the Habitat Regulations Assessment. In all other instances, it is generally considered that the priority for the Authority will be the provision of affordable housing and in most cases its provision will be prioritised above other contributions.

29.33 A Planning Obligations SPG and Affordable Housing SPG will be developed to provide additional guidance and clarity and to support the implementation of the revised LDP.

30. Does the LDP provide a monitoring framework that will enable the LPA to track the implementation of the strategy and policies on an annual basis and, if necessary, trigger a review?

30.1 Yes, chapter 12 of the Deposit Plan sets out the Monitoring and Implementation guidance for the LDP. The Monitoring Framework contained therein sets out a series of indicators, targets and trigger points for action to monitor the delivery of the Plan's policies and Strategic Objectives. These will be monitored, reported and reviewed annually through the Annual Monitoring Report and appropriate action taken where necessary as set out within Table 12: Monitoring Outcomes of the Deposit Plan.

30.2 In addition to the above, a monitoring framework is proposed within the ISA Report (as amended by Ref 19 of the ISA Addendum) to meet the requirements of Article 17 of the *Environmental Assessment of Plans and Programmes (Wales) Regulations 2004*. This is to ensure that any unforeseen adverse effects can be remediated. Trigger points for remedial action are outlined within Table 25 of the ISA Report. This review will be undertaken annually, and in conjunction with the AMR.