

**CARMARTHENSHIRE
REVISED LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION**

SCHEDULE OF MATTERS, ISSUES AND QUESTIONS

Matter 1: Plan Preparation and RLDP Strategic Framework

Issue – Is the RLDP legally compliant, and is the Plan’s Strategy justified and likely to be effective in ensuring that the development needs of Carmarthenshire can be met in a way that contributes to the achievement of sustainable development?

Plan Preparation

1. **Has the RLDP been prepared in accordance with the requirements of:**
 - a) **The approved Delivery Agreement, including the Community Involvement Scheme?**
 - b) **The Well-being of Future Generations Act (Wales) (2015)? and**
 - c) **The Equality Act (2010)?**

Answer (a)

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 were 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.

Answer (b)

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.

The promotion and recognition of well-being was interwoven into Plan preparation including through the Issues, Vision and Strategic Objectives Topic Paper (submission document CSD68) which assessed the compatibility of the Plan’s 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 Wellbeing 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.

Answer (c)

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.

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 Plan been subject to a robust Sustainability Appraisal/Strategic Environmental Assessment? and have all the 'likely significant environmental effects' of the Plan and all 'reasonable alternatives' been identified, described and evaluated?

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.

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 Plan been subject to a robust Habitats Regulations Assessment (HRA)? Where 'likely significant environmental effects' have been identified, has an adequate Appropriate Assessment been undertaken?

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. Does the HRA take account of National Resources Wales advice regarding phosphate levels in Riverine Special Areas of Conservation?

Yes. Natural Resources Wales's ['Advice to planning authorities for planning applications affecting phosphorous sensitive river Special Areas of Conservation'](#) was considered within the HRA Addendum (both Versions 1 and 2) and later in the HRA 2nd Addendum which was published for consultation on the 19th February 2024 (Version 3). However, Version 4 of this advice was subsequently published on the 28th of June 2024. This update was centred on a shift away from 'phosphate' pollution and instead towards 'nutrients' – a term used in this instance to describe both phosphorus and ammonia. Other than this amendment, no other changes were made to the section detailing the advice for the review of LDPs.

Following the precautionary principle, all allocations contained within the Revised LDP underwent a screening assessment to determine whether it could have the potential to affect a SAC on a case-by-case basis. This remains consistent with the screening advice set out within the latest version of the guidance. In compliance with the Habitat Regulations, for those allocations where a likely significant effect could not be ruled out and where the criteria set out by Appropriate Nature Conservation Body was not met, an appropriate assessment followed. While the updated guidance does clarify certain technical aspects related to individual applications (the design of private sewage systems for instance), at a strategic plan level the updated guidance is not considered to undermine the appropriate assessment contained throughout the HRA suite. It is for this reason that the mitigation measures including those

incorporated into the revised LDP (policy CCH4) can continue to be relied upon to avoid adverse effects to the integrity of the national site network.

Noting the reference to version 4 of the NRW guidance and the move from phosphate pollution towards nutrients, the Revised LDP would benefit from small amendments to the wording of CCH4. Consequently, it is suggested that to ensure it is consistent with this guidance the policy should be changed to reflect nutrients as opposed to phosphates. Any such change would form part of any future Matters Arising Changes.

5. Is the Plan consistent with Future Wales: The National Development Framework?

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.

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, 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.

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.

6. Has the Plan had regard to the requirements of the Well-being of Future Generations Act (Wales) 2015 with regard to the well-being goals and ways of working?

The Revised LDP has full regard to the requirements 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. The promotion and recognition of well-being was interwoven into Plan preparation including through the Issues, Vision and Strategic Objectives Topic Paper (submission document CSD68) which assessed the compatibility of the Plan’s 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. The ‘sustainable development principle’ is a tenet which underpins the Plan’s aims and the Council has had full regard to this and to the ways of working identified during the Plan’s preparation.

7. Have there been any significant changes in national policy or local circumstances since the RLDP 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 and what is the intended timescale for this work?

Yes, there have been changes in national policy, notably through the publication of Planning Policy Wales Edition.12 and specifically the amendments to Chapter 6, and changes to policy and legislation in respect of second homes and short-term holiday lets. Reference is made to the Council’s response to the Inspector’s Initial Questions and to the statements for the Hearing Sessions.

In terms of the implications for the Plan these are identified in the statements and Council’s responses with a number of the changes required to ensure consistency with national planning policy.

Any amendments required as part of the examination to reflect the provisions of Planning Policy Wales Edition 12 and specifically Chapter 6 will be set out as matters arising changes.

Vision, Objectives and Strategy

8. Is the Plan's Vision sufficiently aspirational and locally specific to form the basis for planning to 2033? And how will they be delivered?

The LDP has a meaningful and deliverable Vision to address the issues and objectives highlighted within the Plan. The Vision 'One Carmarthenshire' communicates the sort of place the County is aspiring to become and is clearly set out in Chapter 6 of the Deposit LDP. The Vision is spatially relevant given that the role of the 3 principal centres, local communities, and the rural areas and open countryside are all expressed to meet local distinctiveness and the differential needs of communities.

The Vision also contains a clear expression of the importance of the Swansea Bay City Deal in delivering the regeneration ambitions for the County and the region. This in turn links to and is reflective of the national ambitions set through Future Wales notably in relation to the designation of the Swansea Bay and Llanelli National Growth Area as well as the identification of Carmarthen as a regional growth area. Regard is therefore had to the content of Strategic Policy SP6: Strategic Sites and the identification of Yr Egin and Pentre Awel as strategic sites.

The Revised LDP vision directly incorporates the vision set out in the Council's Corporate Strategy. Whilst there is no vision to directly draw upon from the Carmarthenshire Wellbeing Plan, the Revised LDP vision reflects its four wellbeing objectives which are (1) Healthy Habits (2) Early Intervention (3) Strong Connections and (4) Prosperous People and Places.

The proposed Revised LDP Vision is therefore considered to be appropriate and compatible with achieving sustainable development. Reference should be made to Chapter 6 of the Pre-Deposit Preferred Strategy (Submission Document CSD2).

The strategic objectives provide statements of a condition which the Authority wants to bring about and represent broad intentions to which the more detailed policies and proposals will be intended to deliver in due course. The Strategic Objectives are clearly set out in Chapter 7 of the 2nd Deposit LDP.

9. Are the Plan's objectives SMART and capable of delivering on the identified Vision?

Yes. Specific reference is made to Topic Paper: Issues, Vision and Objectives (Submission Document CSD68). This paper reviews the Plan's Strategic Objectives in the context of the issues and confirms they are also Specific, Measurable, Relevant, Attainable and Time Bound (SMART). Reference is drawn to the compatibility of the Strategic Objectives against the ISA objectives

The Plan's Strategic Objectives are considered:

Specific – They are considered specific in nature and have been devised based on the issues including economic, social, environmental or cultural as identified with the

Strategic Objectives developed accordingly. They have been informed by the SA process, particularly having regard to the Wellbeing and sustainability agendas. As such, the Strategic Objectives provide a framework for implementing approaches to address the issues in relation to the Plan's preparation and the SA and ISA process.

Measurable – The Revised LDP contains a monitoring and implementation framework which will allow for an ongoing assessment of the success or otherwise in implementing the plans policies and provisions. In this respect it should be noted that the policies and provisions flow from the issues and through the Strategic Objectives. The objectives form part of the basis for monitoring the implementation of the Plan. This has enabled a set of targets and indicators to be formulated within the monitoring framework, to ensure the implementation of the Plan can be tracked and measured.

Attainable – The Strategic Objectives have been defined to reflect identified key issues, align with national policy and ensure an appropriate balance with the sustainability objectives. They are crosscutting and reference the goals and objectives of the Well-being of Future Generations (Wales) Act 2015 and the Carmarthenshire Well-being Plan.

Realistic – The Strategic Objectives have been subject to assessment and compatibility testing and have been demonstrated as consistent and implementable. They have also been subject to iteration through the SA and ISA process.

Time-Based – The monitoring framework as set out within the Revised LDP allows for an ongoing assessment of whether the delivery of the Plan and the underlying strategic objectives remain representative. This is in light of the prevailing economic, social, environmental or cultural circumstances – noting that contextual changes occur throughout the preparation and implementation of the plan. This will be contained within an Annual Monitoring Report which will allow the Council the opportunity to assess the policies and provisions against the most up-to-date contextual information available, including changes to national policy, local strategies etc.

a) Should strategic objectives S02, S04 and S011 include a reference to housing?

No, the strategic objectives were formulated and are considered appropriate with specific reference made to SO10, which reflects the role and importance of housing as an issue and subsequent objective in the formulation of the Plan.

As set out within the Issues, Vision and Strategic Objectives Topic paper (Submission Document CSD68) the Strategic Objectives were derived from the formulation of the Carmarthenshire Wellbeing Plan and provide for a strategic

integration having clear regard to other Plans and Strategies of the Council. However, as part of their formulation and through the pre-deposit preparatory process it was considered that the objectives as set out within the wellbeing plan would better serve by playing an informing role. Reference is made to Appendix 1 of the Topic Paper (Submission Document CSD68) which sets out a Compatibility Assessment against the 15 wellbeing objectives contained within the then Council's Corporate Strategy (2019) and Appendix 2 which cross-references the compatibility of the Strategic Objectives against one another. Consultation was undertaken on the draft Strategic Objectives as part of the publication of the Draft Preferred Strategy in December 2018, but also as part of the first and second Deposit Revised LDPs. It is also noted that the Strategic Objectives have formed an important component in the content of the Plan's previous sustainability appraisal as well as the Integrated Sustainability Appraisal (Submission Documents CSD16 - 20).

It is further considered that the inclusion of housing at the exclusion of potentially other land uses would limit their focus and change the thrust and meaning underpinning the objectives. It would also unnecessarily undermine the assessment processes and require further reassessments in relation to the Plan's evidence base.

10. Does the Plan's Spatial Strategy represent an appropriate approach for delivering, managing and distributing growth over the Plan period?

Yes. The preferred spatial strategy (Balanced Community and Sustainable Growth Strategy) seeks to retain an approach which reflects the role and function of settlements and the growth centred to deliver our communities' needs. It also recognises the diversity that exists within the County and sets out a clear growth and spatial strategy to realise the Council's corporate and strategic ambitions. Policy SP1 sets the future level of growth, and its main aims are to deliver new homes in a suitable manner responding to the Council's objectives such as the affordable housing programmes and to deliver a community's needs and meet market demands. The Policy also explores the relationship of new housing with the creation of new employment land to enable a more established work force, to balance the working age demographic, combat outmigration and minimise out-commuting.

a) How has the Spatial Strategy been derived and is it based on robust evidence?

The Spatial Strategy is based on robust evidence including through the formulation and assessment of 6 strategic options. These options and the identification of the preferred option are as set out in the Revised LDP and represent an important component of Plan making including the Integrated Sustainability Appraisal and its Strategic Environmental Assessment. Specific reference is made to the Spatial Option Topic Paper (submission document CSD69) which details the formulation

and development of the options and the selection of a chosen option including the role of stakeholders in that process.

The consideration of strategic options was an important part in the preparation of the LDP and were subject to engagement to assess and evaluate their appropriateness with a view to establishing or developing a preferred option. Their content reflected the need to have regard to legislation, national planning policy, local and regional strategies whilst recognising the specific characteristics, assets and issues which are prevalent in Carmarthenshire.

Reference is made to the strategic growth option considered appropriate for the County and evidenced in the Spatial Option Topic Paper (submission document CSD69). Reference is also made to the Growth and Spatial Distribution Topic Papers (submission document CSD74 and CSD75) and the Housing and Economic Growth Report (submission document CSD34), which in combination has allowed an assessment of reasonable growth alternatives to be considered, with a favoured spatial option being presented to be the most appropriate, and the most sustainable to deliver the Revised LDP Vision and Objectives.

b) What are the key components of the Spatial Strategy and how do they interact?

The Revised LDP recognises the diversity that exists within the County and the need to reflect this in its strategic approach. The Spatial Strategy identifies a settlement hierarchy but sets it within a settlement framework grouped under six clusters. These clusters, and the distribution of growth will focus on sustainable principles, but will also recognise the respective role, function and contribution each settlement has within its cluster. Growth will be distributed accordingly to identified centres, whilst the role of smaller settlements within Carmarthenshire to deliver local and sustainable growth is also noted.

The strategic growth areas reflect the current urban form in the shape of Llanelli, Ammanford/Cross Hands and Carmarthen with their respective sustainability credentials and strong economic drivers from a market demand and delivery perspective. These three growth areas are designated as principal centres and whilst they will receive an appropriate proportion of the anticipated growth, there will be a balanced approach to distribution.

Other areas will include a focus on Local Growth and Diversification. These areas are those where growth will reflect the community, whilst understanding those wider delivery expectations.

Allocated sites and the use of policies will provide a framework for the provision of employment and job creation opportunities. This will seek to provide a positive

approach to help these areas meet their full potential and build on the opportunities within all of Carmarthenshire's communities

c) Does the Strategy represent a sustainable approach to planning over the Plan period? And does it effectively link transportation, employment and residential growth?

The Plan seeks to distribute growth and development spatially across the County, with settlements allocated to one of 6 clusters within the hierarchy. The cluster-based approach is flexible in apportioning new growth and avoids any assumption that every settlement in every tier must contribute towards growth but rather directs the majority of growth to the most sustainable locations. Regard has also been given to cross boundary settlements, and how they impact on the role and function of Carmarthenshire's border settlements.

The Authority commissioned consultants to undertake a comprehensive assessment of housing and economic growth options for Carmarthenshire, which builds upon existing studies and looks to provide up-to-date evidence to inform the Revised Local Development Plan (submission document CSD34). The assessment has been undertaken in accordance with the Welsh Government's Development Plans Manual, which emphasises the importance of balancing housing and job growth to reduce the need for commuting.

d) Does the Spatial Strategy maximise the use of previously developed land and adopt the sequential approach to the release of land as set out in Planning Policy Wales?

The strategy seeks to direct development to the Principal Centres and the former industrial heartlands within the county where typically previously developed land is prevalent given their former industrial character and history. However, given the rural nature of a significant part of the County the availability of previously developed land is limited.

The ongoing commitment to previously developed land within these areas represents a degree of continuity with the existing LDP. Within the preparation of the Revised LDP, the allocation of various land uses on previously developed land was considered within the site assessment methodology and the criteria set out at the start of the site selection process. The Strategy has stringently followed the site search sequence in line with PPW. Previously developed land and/or underutilised sites located within existing settlements have been considered in the first instance, followed by suitable and sustainable sites on the edge of the Principal and Service Centres.

Reference is drawn to several key sites within the Plan which are on previously developed land. These sites include North Dock, Llanelli (210 dwellings), Pentre

Awel, Llanelli (240 dwellings), Land at Former Dinas Yard, Kidwelly (71 dwellings), Burry Port Harbourside (364 dwellings), Ffos Las (159 dwellings), Golwg y Gwendraeth (141 dwellings), Betws Colliery (66 dwellings), Emlyn Brickworks (177 dwellings).

The development on PDL would seek to minimise developmental pressures on Best and Most Versatile Agricultural Land with reference drawn to the BMV Agricultural Land Topic Paper (submission document CSD79).

e) Are the Spatial Strategy and anticipated levels of growth consistent with those of neighbouring authorities? what are the main cross boundary issues and how have these been addressed?

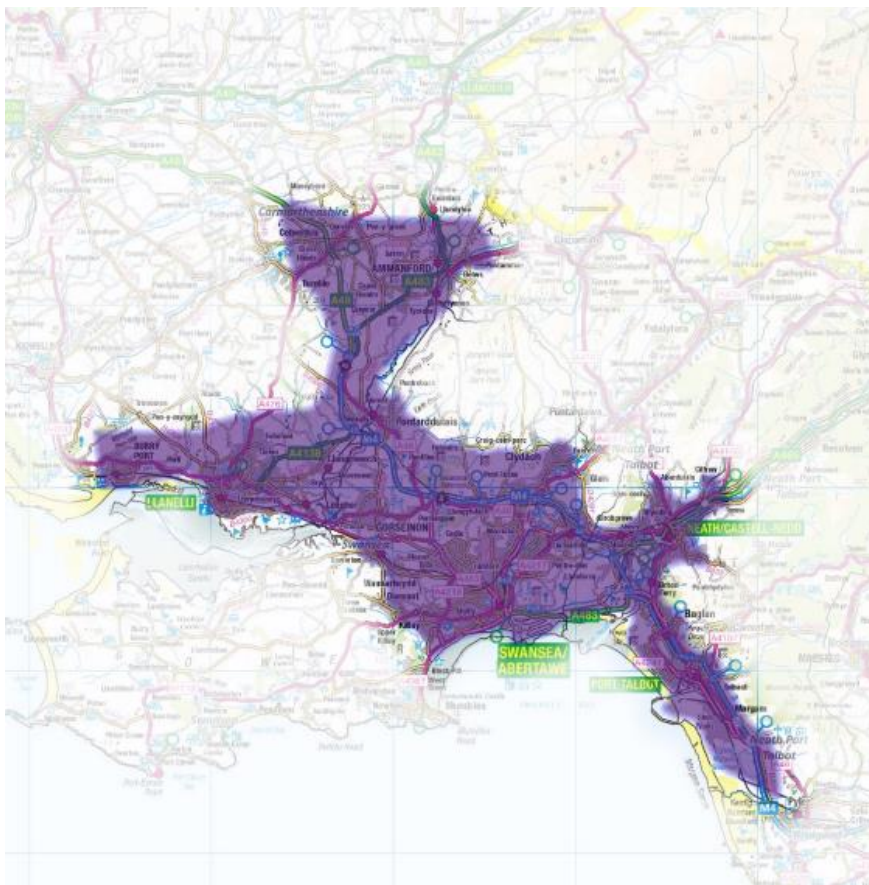
Yes. Reference is made to the Position Statement in respect of Regional Collaboration (Submission Document CSD67). This statement has been prepared in collaboration with the other local planning authorities across the region. Reflecting its draft status, this statement will evolve as the respective replacement LDPs develop. It seeks to provide an overview of cross boundary, strategic planning matters for the South West Wales region and demonstrates how the LDPs, where under review, are being prepared with regard to an agreed understanding of the issues and requirements within the South West Wales region as defined within Future Wales: The National Plan 2040. It also outlines collaborative working in relation to evidence gathering both in terms of informing the preparation of the replacement LDPs but also the forthcoming Strategic Development Plans (SDP) to be prepared under the auspices of the Corporate Joint Committee (CJC) for South West Wales.

f) Will the Spatial Strategy support national growth areas and the wider region?

Yes, the Plan has been prepared with due regard to Future Wales with notable reference to Policy 1 and Policy 28: National Growth Area – Swansea Bay and Llanelli.

Policy 1 of Future Wales identifies 3 national growth areas which includes Swansea Bay and Llanelli and that these are complemented by Regional Growth Areas (RGAs). Carmarthen is identified as an RGA. Further to the growth areas, Policy 1 states that development and growth in towns and villages in rural areas should be of an appropriate scale and support local aspirations and need. In this respect, the Plan's spatial strategy and its distribution of growth recognise a clear hierarchy of settlements which reflects policy direction nationally and is compatible with that across the region, albeit reflective of the character and needs of Carmarthenshire and its communities.

In relation to Policy 28 and the NGA, it is noted that Future Wales does not define the extent of the Swansea Bay and Llanelli NGA. Consequently, to inform future work in relation to the preparation of a Strategic Development Plan and the replacement/ revised LDPs the local planning authorities in the region prepared the Swansea Bay and Llanelli National Growth Area (NGA) Definition Project Research Report (Submission Document CSD40). This refined the spatial extent of the NGA as identified on the map below. This included the Principal Centres of Llanelli and Ammanford/Cross Hands as well as the Service Centre of Burry Port as identified under Revised LDP Policy SP3. The Carmarthen area (identified as a regional growth centre within Future Wales) is also identified as a Principal Centre within the Revised LDP.



Reference should also be made to the response to the Inspectors' Initial Questions and question 5 above, as well as the content of the Position Statement in respect of Regional Collaboration (CSD67).

g) What is the purpose of Policy SP13? Does it provide an appropriate framework for managing development in rural communities?

Strategic Policy SP13 provides reflects the strategic priority associated the County's rural areas and communities and their contribution socially, environmentally and economically to Carmarthenshire. It provides an overarching framework for promoting sustainable development in rural communities whilst recognising the importance of protecting the wider countryside.

Reference is made to the Plan's preparation in light of other strategies and plans, and notably the Council Moving Carmarthenshire Forward document which emerged from the work associated with the Council's Rural Task Force. This report forms a wide-ranging strategy to regenerate the County's rural communities. The final report was approved at Full Council on the 11th September 2019 and set out a series of recommendations. The inclusion of the strategic policy reflects the corporate importance associated with rural Carmarthenshire.

The policy in reflecting the need to manage and provide for sustainable development within our rural communities is not intended to operate in isolation but should rather be used in conjunction with the suite of specific policies within the plan including but not restricted to the 'Healthy Habits' section of the policy framework – in this respect the application of policies for rural areas runs through the plan and its policies.

11. Is the level of growth contained in Policy SP1 realistic and based on robust and credible evidence?

Reference is drawn to the detailed answers set out in Hearing Session 2 (Housing) and Hearing Session 4 (Employment).

a) What is the purpose of Policy SG1? And have the requirements of the allocated sites listed in the policy been clearly expressed?

The purpose of the policy is to identify the regeneration and mixed-use sites in the Plan to ensure that they are given appropriate status in planning policy terms. It also enables further guidance to be produced through SPG and possibly development briefs in the future to guide suitable development on the sites.

b) Is the inclusion of reserve sites contained in Policy SG2 appropriate and consistent with national planning policy?

The inclusion of the policy reflected an ambition to provide suitable alternative locations for development should sites within the Plan not come forward in a manner

anticipated. It is however considered that this would now be best achieved through the monitoring and implementation of the Plan. As such the sites contained within the policy or indeed others which may subsequently emerge would be best considered as part of any future plan review if and where required.

Consequently, the Council proposes the deletion of the policy and the removal of any subsequent cross referencing. These amendments will be set out within matters arising changes.

12. How have the Settlement Hierarchy and Clusters contained in Policy SP3 been defined? And are they based on robust and credible evidence?

Please see answer to 12a below.

a) What is the purpose of the Settlement Hierarchy? Will it guide new development to the most sustainable locations, and is it clear what types and amount of development, other than housing, will be appropriate in each tier of the hierarchy?

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'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 all 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.

13. Are the requirements of Policy SD1 clearly expressed and consistent with the requirements of national planning policy and are the defined settlement boundaries flexible enough to allow the anticipated level of growth to be delivered?

The use of Development Limits is considered appropriate to the settlements as listed under SP3 and is consistent with the principles of national planning policy through PPW and TAN6.

The Authority considers that the use of development limits contributes to the effective implementation of the Plan and its spatial strategy through the delineation of a sustainable settlement pattern and the consequential distribution of growth throughout the plan area.

The development limits are defined in a manner which enables a level of growth which reflects the respective settlements' position within the hierarchy as defined in Policy SP3 as set out in the 2nd Deposit Plan and in a manner consistent with the methodology identified within the Topic Paper (Submission Document CSD73). In this respect, they seek to ensure there is sufficient opportunities for a proportionate level of growth within the settlement whilst ensuring that any risk of over development is suitably managed. They also serve an important function in preventing a disproportionate level of growth in rural areas contrary to the provisions of national planning policy whilst respecting the diversity of communities across the Plan area. Notably, the extent of the limits also seeks to minimise areas of white land which would result in larger developments, particularly in rural areas where they are clearly not part of an established urban form and would lead to developments of a scale that would normally be subject to an allocation.

Policy SD1 outlines the role of development limits and how they should function. Further guidance relating to their use and application can be found in other Policies, which are intrinsically linked to Policy SD1: Policy HOM2 which identifies those settlements where limits have been considered appropriate and HOM3 which applies a criteria-based approach for those settlements within tier 4 settlements as defined within Policy SP3 of the 2nd Deposit Revised LDP. Also, in addition to the level of appropriate growth permitted through the delineation of the settlement limits the Plan contains clear policies in respect of exceptions proposals, notably in relation to affordable housing and employment provision. In this respect reference should be made to policies AHOM2: Affordable Housing Exceptions Sites and EME4: Employment Proposals on Non-Allocated Sites.

The use of Development Limits and a methodology underpinning their use and delineation is set out within Topic Paper – Development Limits (Submission Document CSD73).

14. Is the approach to site selection sufficiently clear and transparent, and is it founded on robust and credible evidence?

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.

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.

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 but were considered against general planning principles as part of the Development Limits Topic Paper (Submission Document 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 matters.

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.

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

a) Are the allocated sites based on a robust site assessment methodology that takes into account all potential constraints?

The site assessment methodology assessment and by extension the detailed site proformas highlight all potential constraints from the development. Reference is drawn to the answer above under question 14.

b) Have all infrastructure requirements been considered to ensure the timely deliverability of allocated sites?

The requirements for all essential supporting infrastructure have been thoroughly considered during the preparation of the plan, evaluated within each site's supporting technical evidence, and integrated into the housing trajectory phasing analysis to ensure the timely delivery of all allocated sites. The Infrastructure Assessment (Submission Document CSD78) offers a comprehensive schedule of all infrastructure needed for sites identified as key sites (50+ dwellings, or employment sites of 4ha+). It outlines the Revised LDP policy requirements that the proposed sites must meet, along with the necessary infrastructure to facilitate the development

The Infrastructure Assessment is a crucial component of the Revised LDP's evidence base. It details the infrastructure work required to ensure the Revised LDP is both deliverable and viable, and it specifies the entities responsible for implementing various types of infrastructure.

The tables in Appendix 1 of the Infrastructure Assessment provide a detailed breakdown of the site-specific issues, constraints, phasing, and mitigation measures required to deliver key sites, as well as a brief description of the site, infrastructure requirements, policy requirements and planning obligations.

c) Do all of the site allocations accord with the requirements of national planning policy relating to Flood Risk?

The assessment of sites has considered the best available evidence and is in accordance with national policy guidance. The evidence provided has informed the selection of sites and level of flood risk considered in the Site Assessment Methodology.

Please see CSD226 Strategic Flood Consequences Assessment of the Second Deposit Revised Local Development Plan Sites for an assessment of the implications of the Flood Maps for Planning on the proposed Revised LDP allocations. Additional information can be found in Submission Documents CSD227 and CSD228. Further information is provided in the Council's response to the Inspector's initial questions.

15. Has Best and Most Versatile (BMV) land been considered throughout the plan making process? Particularly in relation to the preparation of the ISA, the Spatial Strategy and site allocations?

As part of the preparation of the Revised LDP, due consideration has been given to the location and potential impact of the Plan on BMV agricultural land, notably through the iterations of the Revised LDP Site Assessment Methodology (SAM). Reference should be had to the site proformas produced in relation to each site allocation and notably Q.21 which poses the question 'Does the site contain high quality agricultural land (grade 1, 2, 3a)?' with each proforma completed as appropriate.

Further reference is drawn to the Topic Paper on Best and Most Versatile Land (Submission Document CSD79) which sets out the narrative, and where appropriate, the justification for allocated sites where there may be impacts on BMV agricultural land.

It should be noted that the requirements as set out in the latest iteration of PPW in relation to the consideration of BMV agricultural land post dates the preparation of the preferred strategy.

a) Does the Plan propose the development of BMV land? If so, how much land, where, and is this approach supported by robust and credible evidence?

Reference is made to the Topic Paper on Best and Most Versatile Land (Submission Document CSD79). This paper presents a table on each allocation where Grade 2 or 3a have been allocated for residential, mixed use or employment uses, with the percentage of BMV land highlighted accordingly. The paper provides an analysis of these sites and the justification behind their inclusion.

16. How will the Plan apply the principles of sustainable placemaking contained in Policy SP12?

Strategic Policy SP12 provides an overarching policy framework for the consideration of proposals in accordance with Placemaking and sustainable development principles, it achieves this through a series of criteria which development proposals will be expected to conform to and deliver against. The criteria reflect and set the context for a number of the specific policy requirements identified within the Plan. In this respect, and specifically but not exclusively SP12 is supported by a series of policies focused on the theme of placemaking which further elaborate on the policy requirements. These will be augmented by Supplementary Planning Guidance. These SPG will consider a range of policy and thematic areas including placemaking, green and blue infrastructure, open space in new developments and Biodiversity and the Natural Environment.

Reference is made to Appendix 3 of the 2nd Deposit Revised LDP and the Position Paper in respect of the preparation of SPG (submission document CSD66).

a) Are the requirements of Policy PSD1 and PSD3 clearly expressed and consistent with national planning policy?

Yes. PSD1 is clearly expressed and consistent with national planning policy. However, considering the publication of PPW Edition 12, the following amendment is proposed:

- Replace the words 'sustainability objectives' with 'the *principles of placemaking*' within the first line of the policy this ensure the policy is more reflective of the definition on page 15 of PPW.

In relation to Policy PSD3, this is also clearly expressed and consistent with national planning policy. However, considering the publication of PPW Edition 12, the following amendment is proposed:

- Delete the words '*quality, and condition*' from Point 1 of Policy PSD3 – this more accurately reflects the provisions of paragraph 6.2.2 of PPW.

The above amendments are intended to ensure compliance with national planning policy in the form of PPW. The amendments will also be set out as part of future matters arising changes.

Reference is made to the Council's response to the Inspectors Initial Questions in relation to PSD3 and the requirements for the preparation of Green and Blue Infrastructure Statements as required under national planning policy (PPW paragraph 6.2.12).

b) Are the requirements of Policy PSD4 clearly expressed and consistent with national planning policy?

Yes, PSD4 is consistent with national planning policy. While it is worth noting that PPW Paragraph 6.4.42 recommends a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost, we continue to envisage that outlining what constitutes as compensatory should be a matter for the SPG on Trees and Planting on new developments. This ensures a more flexible and responsive approach can be expressed and applied should targets in future change.

Reference is made to Appendix 3 of the Plan in relation to the timescales to produce SPG. Note this will be updated as part of a future matters arising change to reflect the changes in the timetable for Plan preparation.

17. Are the requirements of Policy SP2 clearly expressed and consistent with national planning policy?

The preparation of the Plan, including this policy, has had due regard to Future Wales: the national plan 2040, Planning Policy Wales and Technical Advice Note 4: retail and commercial development (2016) (TAN4). In accordance with the guidance set out in TAN4, a Retail Study has been prepared to inform the policy and the retail hierarchy in accordance with the guidance set out within chapter 4 of the TAN. The policy has sought to provide guidance to aid the determination of proposals within town centres with the aim of allowing development which maintains or creates sustainable and viable town centres which maximise the centres' vitality. Previous local planning policies have focussed primarily on the retail function of town centres, however, in recognition of changing shopping patterns and the changing role of town centres Policy SP2 seeks to maximise town centres' vitality through accommodating a range of appropriate and complementary uses within them.

18. Does Policy INF1 provide a clear and consistent framework for securing planning obligations? And how will competing priorities be managed?

Policy INF1 provides guidance on securing planning obligations in a clear, consistent and concise manner. SPG on Planning Obligations will provide additional guidance and will be adopted concurrently with the Revised LDP.

In instances where the provision of planning obligations cannot be met for each identified requirement then the local planning authority will identify which contributions should be prioritised in accordance with Paragraph 11.190. This will be done on a case-by-case basis considering available evidence and consultation responses.

It is acknowledged that amendments made to Chapter 6 of PPW seek to prioritise biodiversity and ecosystem resilience. This requirement can be considered on a case-by-case basis according to the specific considerations and attributes of each planning application site. It is therefore considered that Policy INF1 does not need to be amended to prioritise biodiversity.

19. Is Policy SP8 based on robust evidence and consistent with national planning policy in respect of Welsh language and Culture?

Yes, the policy is underpinned by robust evidence as set out within the submission documents CSD24; CSD25; CSD80 and using the best available data relating to the prevalence of Welsh speakers in Carmarthenshire, including the Census data. This aims to provide a policy which is based on credible evidence and reflects the cultural and linguistic character of the county.

The preparation of the Plan, including this policy, has had due regard to Future Wales: the national plan 2040, Planning Policy Wales and Technical Advice Notes. It is also consistent with the Welsh Government's Strategy Cymraeg 2050 a Million Welsh speakers.

The Policy's supporting text reflects the data available at the time of its publication and therefore refers to the 2011 Census data. It is proposed that paragraph 11.173 is amended to reflect the 2021 Census data and to read as follows:

Carmarthenshire in its entirety is considered an area of linguistic sensitivity. The 2021 Census indicates that 17.8% of the Welsh population can speak Welsh, whilst the correlating figure for Carmarthenshire stands at 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 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, and it is largely for this reason Carmarthenshire in its entirety is considered to be linguistically sensitive. Additionally, the most recent Census data has shown a substantial decrease in the number of Welsh speakers across the County illustrating the language's vulnerability in Carmarthenshire.

a) Do the findings of the Welsh Language Impact Assessment allow for growth in the provision of housing and employment related development that exceeds the levels contained in the Plan?

The Welsh Language Impact Assessment (WLIA), conducted in 2022 and 2024, evaluated the likely impact of the revised LDP on the Welsh language. In particular, it assessed the likely impact of the proposed Plan against the area's possible contribution of Welsh language speakers to the Plan end date of 2033. This contribution is itself based on the Welsh Government's trajectory for reaching a million Welsh speakers by 2050.

Part 2 of the 2022 WLIA in particular addressed the requirement for a High-Level Impact Assessment of the revised Growth and Spatial Strategies adopted for the Second Deposit Revised LDP. The discussion on the high-level impact assessment of the Preferred Growth Strategy and reasonable alternatives on Welsh language resilience can be found in Part 2.5.

Based on the evidence available at the time, the Assessment concluded that adopting higher rates of growth in population is likely to lead to higher rates of net migration. The analysis of the 2018/19 net migration figures suggested that a significant proportion of gross in-migration is the result of inflows from neighbouring authorities and from elsewhere in Wales, and as a result conclude that there is a realistic possibility that, over the Plan period, up to a third of in-migrant families could contain an adult Welsh speaker (see para. 43).

The Assessment also notes in para.54 the discussion on the ISA score “*rLDP2 has a realistic possibility of encouraging and realising an overall growth in the number of Welsh speakers. This is particularly true amongst younger age groups. However, the scale of overall growth in homes and jobs is predicated on the 10-year trend based population projection. This assumes recent levels of net migration which is likely to lead to a population with a higher component of older age groups and would thus dampen the influence of a higher proportion of young people able to speak Welsh. Thus, in terms of ISA Scoring Matrix, our view is that it would be a +/- score.*”

The WLIA’s overall conclusion is that adopting higher rates of growth, and associated housing and employment related development rates (over and above the Preferred Growth Strategy), could possibly lead to increased numbers of Welsh speakers but is likely to decrease the density of Welsh speakers within the Plan Area.

As made clear in the response to Question 19 the WLIA is based on the evidence available at the time and were conducted before the results of the 2021 Census were published.

The WLIA was again updated in Spring 2024 to take account of the 2021 Census data. At the time of the Assessment, the linguistic abilities of persons who moved from outside the County during the previous twelve months to March 2021 was not published. Therefore, it was not possible to draw clear conclusions about the likely impact of net migration on the trajectory of Welsh language speakers.

The WLIA not only provided an evaluation of the anticipated impact of the revised LDP but also provided a helpful tool during the revised LDP’s production with some adaptations made to the Plan in response to its findings. However, it is emphasised that the role of the WLIA is to assess the impact of the Plan and aid in its preparation but does not set the revised LDP’s policy agenda.

b) Are the requirements of Policy WL1 clearly expressed and consistent with national planning policy? And should the provisions of Policy PSD9 in respect of Welsh Language be included in the policy?

The Revised LDP, including Policy WL1, has been prepared in accordance with the Future Wales: the national plan 2040, Planning Policy Wales and Technical Advice Note 20: planning and the Welsh language. Supplementary Planning Guidance will be produced to support the implementation of Policy WL1 and will be adopted concurrently with the Revised LDP. This is currently available in draft form; however, this will be subject to future consultation (see Item 8.1 Report 3 for draft SPG [Agenda for County Council on Wednesday, 10th July, 2024, 10.00 am \(gov.wales\)](https://gov.wales))

The supporting text of Policy WL1 refers to Policy PSD9 in paragraph 11.183. Reference could be included in Policy WL1 to Policy PSD9 if considered appropriate

but may result in unnecessary duplication given that the plan should be read as a whole.

20. Should the Plan include a policy which provides a context for the management of phosphate levels in Riverine Special Areas of Conservation? And are the requirements of Policy INF4 clearly expressed?

No. The Revised LDP already makes appropriate provision for the consideration of the management of phosphate levels in Riverine Special Areas of Conservation. In this respect, reference is made to policy CCH4: Water Quality and Protection of Water Resources. However, it is noted that in light of the publication of the latest NRW guidance - Advice to planning authorities for planning applications affecting nutrient sensitive river Special Areas of Conservation, CCH4 will require amendment to reflect the reference to 'nutrients' as opposed to 'phosphates'. This amendment will be proposed as part of matters arising change to ensure there is sufficient clarity in the interpretation for developments outside *the hydrological catchment areas designated for riverine SACs* but nevertheless drain into WwTW / CSO within the SAC.

Additionally, in the interest of specificity, "*development creating wastewater discharges*" is not the only pathway for potential harm – particularly where diffuse run-off, for instance, may be the primary pathway. It is further proposed to amend policy wording to be inclusive of all pathways (e.g., wastewater and diffuse run-off). This reflects the HRA recommendation and is more reflective of NRW's guidance for agricultural/horticultural developments.

The HRA recommended "policy wording could be further revised to be inclusive of all pathways (e.g., wastewater and diffuse run-off)."

"INF5: Rural Allocations outside Public Sewerage System Catchments could be further mitigated by directly referencing in the policy wording that '*such infrastructure will only be permitted if it can be demonstrated that there is no adverse effect on the integrity of phosphorus sensitive riverine SACs*'. Furthermore, policy wording may also seek to assure that the allocation in its entirety utilises a single private system, where appropriate, as the proliferation of private plants may cause environmental issues (whilst, this is currently mentioned within the explanatory text, as it is a policy caveat it should be added to the policy wording itself – in accordance with Section F.10.1.2 of the HRA Handbook)."

The above recommendations were made on the basis of improving the clarity of the plan and were not considered matters relating to its soundness. These amendments will be incorporated as part of the matters arising changes to the Plan.

In relation to INF4 the policy is considered to appropriately express the requirements noting that the detail is contained within the content of the supporting Burry Inlet Supplementary Planning Guidance (SPG) – reference is made to submission document CSD88. The presence of the compensatory water removal requirements and the search sequence within the SPG is noted and whilst the authority does not consider it necessary to specify this in the policy there is however no objection to any such change being proposed.

The SPG will be adopted concurrently with the Revised LDP and has already been subject to formal consultation, it is noted that there will be minor amendments required to ensure consistency with aspects of the adopted Plan. Reference is also made to the position statement on SPG (Submission Document CSD66).