# Revised 2018-2033 Local Development Plan

# **Consultation Report**



# Contents

1. Intr	oductio	n	1
2. Key St	tages in	LDP Preparation	2
3. The D	elivery A	Agreement (DA)	4
3.1	Comm	unity Involvement Scheme	4
4. Pre De	eposit St	ages of the Plan	6
4.1	Introd	uction	6
4.2			7
4.3			7
4.4			
4.5	<u> </u>		
4.6	Call for Gypsy and Traveller Sites 8		
4.7		Itation on Sites Submitted on the 'Register of Candidate Sites'	8
4.8			8
		eposit Preferred Strategy	
4.9		red Strategy - Key Themes from Representations	10
	•	Revised LDP	11
6. Secon	d Depos	sit Revised LDP	12
7. Integr	ated Su	stainability Appraisal & Habitats Regulations Assessment	16
Appen		Revised LDP Diary	
Appen	dix 2	Revised LDP Delivery Agreement (DA):	
		2a – Draft Revised LDP Timetable (February 2018) 2b – Revised LDP DA responses (Report to County Council, 13 June 2018)	
		2c – County Council Minutes (13 June 2018)	
		2d – Revised LDP Timetable (agreed by Welsh Government 12 November 2020	
		2e – Revised LDP Timetable (agreed by Welsh Government on 25 August 2022)	
		2f – Revised LDP Timetable (agreed by Welsh Government January 2024)	
Appen	dix 3	Revised LDP Preferred Strategy (PS):	
		3a – Revised LDP PS Responses (Report to County Council, 15 May 2019)	
Appen	div 1	3b – County Council Minutes (15 May 2019) Habitats Regulations Assessment (HRA) Screening Report responses	
Appen		Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) Scoping	
, ippen		Report and Initial Report responses	
Appen	dix 6	County Council Minutes (13 January 2021) - Revised Carmarthenshire LDP	
		Representations Received and Focused Changes (to the 1st Deposit Plan)	
Appen	dix 7	County Council Minutes (9 March 2022) – Revised Carmarthenshire LDP Next	
_		Steps and Revised Delivery Agreement, including Position Paper on Phosphates	
Appen	dix 8	County Council Minutes (7 December 2022) - Revised Carmarthenshire LDP Draft	Ī
Appen	div a	Second Deposit  Key themes to emerge as part of the consultation into the 2 <sup>nd</sup> Deposit Revised	
Thheim	WIN J	LDP.	

Appendix 10 Social Media Consultations
 Appendix 11 Communication sent
 Appendix 12 Responses received to the 2<sup>nd</sup> Deposit LDP
 Appendix 13 Responses received to the ISA / HRA accompanying the 2<sup>nd</sup> Deposit LDP
 Appendix 14 Reponses received to the Focussed Changes consultation on the ISA / HRA (February 2024)

#### 1.Introduction

- 1.1 The requirement for Councils to prepare a Local Development Plan (LDP) is set out in the Planning and Compulsory Purchase Act 2004. One of the aims of the LDP is to make the development plan system more relevant, inclusive and engaging to local communities. Following adoption, the Revised LDP will replace the current adopted LDP for Carmarthenshire. The Revised LDP will provide the development strategy and policy framework for Carmarthenshire from adoption to 2033.
- 1.2 This consultation report builds on that prepared to accompany the publication of the 1<sup>st</sup> Deposit Revised LDP. It reflects the subsequent decision to prepare a 2<sup>nd</sup> Deposit in order reflect certain contextual issues that had arisen since the 1<sup>st</sup> Deposit Plan was published. In this respect it includes, for information, details of the responses received to the 1<sup>st</sup> Deposit and the Focused Changes proposed as a result of that consultation. The representations received to the 1<sup>st</sup> Deposit are not being carried forward as formal duly made comments but are presented here for information purposes. In addition, the Focused Changes as agreed by County Council on 13<sup>th</sup> January 2021 whilst informing the content of the 2<sup>nd</sup> Deposit were not subject to formal publication for consultation.
- 1.3 This Consultation Report had been prepared in accordance with the requirements of Regulation 16A of the Town and Country planning (Local Development Plan) (Wales) (Amendment) Regulations 2015, and advice contained within the Local Development Plan (LDP) Manual Edition 3, and identifies:
  - The steps taken to publicise and engage throughout the LDP preparation process and how this complies with the Community Involvement Scheme (CIS) contained in the Delivery Agreement (DA), including any deviation from it.
  - The bodies engaged, notified and consulted at pre-deposit participation (Regulation 14) and pre-deposit consultation (Regulation 15).
  - A summary of the main issues raised at the pre-deposit stages, including the total number of representations received and how these have influenced the preparation of the Deposit LDP
  - An outline of the issues raised as part of the consultation associated with the 1st Deposit Revised LDP including total number of representations and how these were considered and how these informed the focused changes as originally proposed.
  - A Summary of the comments received on the Candidate and Alternative Sites.
  - A summary of the comments received at the Second Deposit Stage, including a breakdown of the elements of the Plan comments were received.
- 1.4 This report will be updated as necessary and will form the Consultation Report which will be submitted in accordance with Regulation 22 (2) (c) of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.

## 2. Key Stages in LDP Preparation

- 2.1 The preparation of the LDP involves a number of key stages. It commenced with the original Delivery Agreement (DA) as agreed by the Welsh Government (WG) on 28 June 2018 and was originally scheduled to culminate in the adoption of the Plan, in November/December 2021. However, as a consequence of contextual issues notably: the public health challenges faced as a result of Covid-19 and the associated lockdowns; and, the publication of the Natural Resources Wales (NRW) Guidance on Phosphate levels in Riverine Special Areas of Conservation (SACs), this has resulted in the preparation being delayed.
- 2.2 At the meeting of County Council on the 9<sup>th</sup> March 2022 it was resolved to prepare a 2<sup>nd</sup> Deposit version of the Revised LDP as well as a Revised DA for agreement with the Welsh Government. Consequently, a Revised DA was prepared and received Welsh Government Agreement on the 25<sup>th</sup> August 2022.
- 2.3 The LDP has evolved and developed since its commencement in 2018, following the preparation of the LDP Review Report in respect of the current adopted LDP, and the Council's resolution to prepare the Revised LDP. To date the Plan has proceeded through Key Stages 1 4 as set out below.
- 2.4 The key stages in the preparatory process are as follows:
  - Key Stage 1 Delivery Agreement (LDP Reg. No. 5 -10)
  - Key Stage 2 Pre-Deposit Preparation and Participation (LDP Reg. No. 14)
  - Key Stage 3 Pre-Deposit Public Consultation (LDP Reg. No. 15, 16)
  - Key Stage 4 Deposit Local Development Plan (LDP Reg. No. 17 21)
  - Key Stage 5 Submission to WG for Examination (LDP Reg. No. 22)
  - Key Stage 6 Independent Examination (LDP Reg. No. 23)
  - Key Stage 7 Receipt and Publication of the Inspector's Report (LDP Reg. No. 24)
  - Key Stage 8 Adoption (LDP Reg. No. 25)
  - Key Stage 9 Monitoring and Review (LDP Reg. No. 37)
- 2.5 The key plan stages undertaken to date are set out below:

June 2018

# Review Report January 2018 Delivery Agreement Approved (Reg 9)

- Advisory Panel Convened November 2017
- Council resolved to commence work on the preparation of RLDP December 2018
- Invitation for Candidate Sites (5/2/18 29/8/18)
  - Consultation on Delivery Agreement (5/2/18 23/3/18)
- Key Stakeholder Forum Established May 2018
- Delivery Agreement Agreed by Council (13/6/18)
- Delivery Agreement Approved by WG (28/6/18)

#### **Preferred Strategy Consultation (Reg 15)**

December 2018

- Preferred Strategy Consultation (12/12/18 8/2/19)
- Consultation on Review Report, Candidate Site Register and Invitation for Sand and Gravel Sites (12/12/18 – 8/2/19)
- Call for Gypsy & Traveller Sites (28/1/19 8/4/19)

#### 1<sup>st</sup> Deposit Plan Consultation (Reg 17)

January & September 2020

- Council approval for commencement of 1<sup>st</sup> Deposit LDP consultation (13/11/19)
- 1<sup>st</sup> Deposit LDP Consultation (29/1/20 27/3/20 & 11/9/20 2/10/20)

#### **Revised Delivery Agreement Approved**

November 2020

- Council endorsement of Revised Delivery Agreement (22/10/20)
- Welsh Government approval of Revised Delivery Agreement (10/11/20)

#### **Revised Delivery Agreement Approved**

August 2022

- Council endorsement of Revised Delivery Agreement (9/3/22)
- Welsh Government approval of Revised Delivery Agreement (25/8/22)

#### 2<sup>nd</sup> Deposit Plan Consultation (Reg 17)

February 2023

- Council approval for commencement of 2<sup>nd</sup> Deposit LDP consultation (7/12/22)
- 2<sup>nd</sup> Deposit LDP Consultation (17/2/23 14/4/23)

#### **Revised Delivery Agreement Approved**

January 2024

 Welsh Government approval of Revised Delivery Agreement (2/1/24)

# Focussed Changes on ISA & HRA including Addendums

February 2024

Focus Changes Consultation on ISA / HRA (19/2/24-3/4/24)

# 3. The Delivery Agreement (DA)

- 3.0.1 The first requirement of the LDP preparatory process is the preparation of a DA. The DA represents a public statement of the Council's commitment to the preparation of the Revised LDP. It provides the timetable for the preparation of the Plan and through its Community Involvement Scheme (CIS), details how and when the Council will consult and engage with groups, organisations and individuals during the Plan's preparatory process. It also represents an agreement between Carmarthenshire County Council and the Welsh Government (WG) on how the Plan is to be prepared, including setting out:
  - The timetable for the Plan's preparation through to adoption;
  - The Community Involvement Scheme, including feedback mechanisms; and
  - The resources the Council is committing to the preparation of the Plan.
- 3.0.2 The initial DA was made available for consultation from the 5<sup>th</sup> February to the 23<sup>rd</sup> March 2018 and publicised accordingly. Reference should be made to Appendix 1 in relation to the LDP Diary. Following due consideration of the responses received by County Council on the 13<sup>th</sup> June 2018, the draft DA was submitted to the WG for approval. The DA was agreed by the WG on the 28<sup>th</sup> June 2018.
- 3.0.3 Subsequent revisions to the DA have been undertaken to reflect the impacts of Covid-19 and subsequently the publication of the NRW Guidance on phosphate levels within protected Riverine SACs. Revisions were published in November 2020, August 2022, January 2024.
- 3.0.4 Appendix 2 details the timetable and revisions to it for the Key Stages of the LDP Process taken from the Delivery Agreement.

## 3.1 Community Involvement Scheme

- 3.1.1 The Community Involvement Scheme (CIS) sets out why it is important to involve the community. It identifies who should be involved and suggests how to get involved in the LDP process. It is vital in order to achieve a plan that has local ownership and legitimises the policies that will shape the future distribution of land uses and development within Carmarthenshire.
- 3.1.2 Carmarthenshire can be characterised as a county of contrasts with the agricultural economy and landscape of rural Carmarthenshire juxtaposed with the urban and industrial south-eastern area. The diversity in population (including distribution, age, employment and culture) presents a challenging task in involving the community in the LDP process.
- 3.1.3 The CIS identified a number of existing ways in which the Council does and will engage and consult with the general public, and other parties. The approach seeks to maximise the audience for the LDP and increase opportunities for engagement. These are set out within section 3.4 of the Delivery Agreement with further details contained within the Revised LDP Diary (Appendix 1).

- 3.1.4 An extensive programme of engagement has been undertaken involving key stakeholders and members of the public. Events were held with key stakeholders and forums. These sessions helped to identify the key issues facing the County, consider the strategic options for the amount and location of growth, and establish the objectives for the future of the Plan area.
- 3.1.5 A mailing list was established early in the LDP process where members of the public and consultees (statutory and non-statutory) were informed by letter or email, depending on preference, of Plan preparation updates. Copies of communication sent can be found in Appendix 11.
- 3.1.6 The following table details the events and means of engagement with the public and interested parties.

Method	Details		
Advisory Panel	13 meetings took place:		
	2017: 9/11/17; 17/11/17;		
	2018: 19/1/18; 8/5/18; 17/7/18; 1/10/18;		
	26/10/18		
	2019: 24/4/19; 24/9/19		
	2020: 28/7/20		
	2021: 5/1/21		
Kara Otalah aldan Famusa	2022: 19/10/22; 30/11/22		
Key Stakeholder Forum	2 meetings took place: 23/5/18 & 13/9/18		
Developer Forum	2 meetings took place: 5/7/18 & 20/9/18		
Town and Community Council Seminar	30/7/18		
Other Events	Presentation to the Plaid Cymru Group (2/2/18)		
	<ul> <li>Presentation to the Labour Group (21/2/18 &amp;</li> </ul>		
	7/3/18)		
	<ul> <li>Presentation to the Public Services Board (8/3/18)</li> </ul>		
	Presentation to Planning Agents (16/3/18)		
	Presentation to the Independent Group (19/3/18)		
	<ul> <li>Presentation to the Independent Group (25/6/18)</li> </ul>		
	Presentation to the Plaid Group (9/7/18)		
	<ul> <li>Presentation to the Independent Group (4/7/19)</li> </ul>		
	<ul> <li>Presentation to the Labour Group (11/9/19)</li> </ul>		
	<ul> <li>Presentation to the Independent Group (17/9/19)</li> </ul>		
	Councillor drop-in sessions (10 & 18/10/19)		
1 <sup>st</sup> Deposit LDP Drop-in Sessions	There were 2 sessions at each venue. Session 1 was		
	from 10am to 1pm and Session 2 was from 2pm to		
	7pm.		
	3 February 2020: Llangadog Community Centre,		
	Dyrfal Road, Llangadog,		
	• 5 February 2020: Llanelli Town Hall, Town Hall		
	Square, Llanelli		
	6 February 2020: Pontyberem Memorial Hall,		
	Coalbrook Road, Pontyberem		
	• 10 February 2020: Dinefwr Indoor Bowls Club,		
	Manor Road, Ammanford		
	• 11 February 2020: The Gate, Pentre Road, St		
	Clears		

	<ul> <li>12 February 2020: Aberduar Chapel Vestry, Bro Einon Road, Llanybydder</li> <li>13 February 2020: Carmarthen Library, 9 St Peter's Street, Carmarthen</li> </ul>
2 <sup>nd</sup> Deposit LDP Drop-in Sessions	<ul> <li>27 February 2023: New Library, Ammanford (10.00 – 19.00)</li> <li>28 February 2023: Meeting Room, Newcastle Emlyn Leisure Centre, Newcastle Emlyn (12.00 – 19.00)</li> <li>1 March 2023: Pontyberem Memorial Hall, Coalbrook Road, Pontyberem (12.00 – 19.00)</li> <li>6 March 2023: Hwb, St. Catherine's Walk, Carmarthen (10.00 – 19.00)</li> <li>7 March 2023: The Gate, Pentre Road, St Clears (12.00 – 19.00)</li> <li>7 March 2023: Llangadog Community Centre, Heol Dyrfal, Llangadog (12.00 – 19.00)</li> <li>8 March 2023: Llanelli Town Hall, Town Hall Square, Llanelli (10.00 – 19.00)</li> </ul>
On-line consultation system (and supporting back-office system)	An online consultation portal (Opus Consult) was used to facilitate the consultation on the Preferred Strategy, the 1 <sup>St</sup> Deposit LDP and the 2 <sup>nd</sup> Deposit LDP.

# 4. Pre Deposit Stages of the Plan

#### 4.1 Introduction

- 4.1.1 This section outlines some of the key tasks undertaken as part of the pre-deposit element of the LDP process. This stage in Plan making fulfils a critical role in guiding the future shape and strategic direction of the Plan.
- 4.1.2 Some of the key components and tasks undertaken in respect of the Pre Deposit preparation and participation are as follows. Reference should be made to Appendix 1 in respect of the LDP diary for further details of scope and purpose and in respect of participants, publication and reporting dates.
- 4.1.3 The following list is not exhaustive:
- Evidence Gathering and review of data and baseline information (incl. the LDP Review Report, Annual Monitoring Reports, SA/SEA and HRA)
- Draft Sustainability Appraisal (SA) Scoping Report
- Key Stakeholder Forum (KSF)
- Town and Community Council Engagement
- Publication of Topic Papers
- Publication for Consultation of the Pre Deposit Preferred Strategy along with the SA/SEA Initial SA Report and the HRA Screening Report
- Publication of further evidence and topic papers

- County Council Members Sessions including LDP Advisory Panel, Drop-in Sessions and attendance of political groupings
- 4.1.4 The key Pre-Deposit stages also included the Candidate Sites Process and the publication of the Preferred Strategy.

## 4.2 Key Stakeholder Forum (KSF) – Session 1

- 4.2.1 The first KSF was held in the St Peter's Hall, Carmarthen on the 23<sup>rd</sup> May 2018. The Event was facilitated by representatives of Planning Aid Wales alongside the Authority's Forward Planning Section. Delegate packs were provided to attendees.
- 4.2.2 Details of the session, presentations and feedback are contained within the KSF Feedback Report as published on the Revised LDP webpages. This can be viewed though the following link:

https://www.carmarthenshire.gov.wales/media/1216449/key-stakeholder-forum-meeting-23-05-18-c.pdf

#### 4.3 Key Stakeholder Forum (KSF) – Session 2

- 4.3.1 The second KSF was held in the St Peter's Hall, Carmarthen on the 13<sup>th</sup> September 2018. The Event was facilitated by representatives of Planning Aid Wales alongside the Authority's Forward Planning Section. Delegate packs were provided to attendees.
- 4.3.2 Details of the session, presentations and feedback are contained within the KSF Feedback Report as published on the Revised LDP webpages. This can be viewed though the following link:

https://www.carmarthenshire.gov.wales/media/1216448/key-stakeholder-forum-meeting-130918.pdf

## 4.4 Candidate Site Stage

- 4.4.1 Between the 5<sup>th</sup> February and 29<sup>th</sup> August 2018, the Council sought a call for landowners, stakeholder, developers and members of the public to submit candidate sites for all land use development proposals within the County. The consultation was widely advertised and resulted in the submission of over 920 candidate site submissions. The candidate site register was published on the 12<sup>th</sup> December 2018. This was also made available on the Council's website with an opportunity for views to be submitted.
- 4.4.2 As part of the consideration of the candidate sites a series of technical and other consultees were contacted as part of the assessment process, most notably to identify any constraints that might impact upon the delivery of sites. The outcome of this process informed the selection of sites for inclusion within the 1<sup>st</sup> and 2<sup>nd</sup> Deposit Revised LDP.

#### 4.5 Call for Candidate Sand and Gravel Sites

- 4.5.1 The 'call for sand and gravel sites' was undertaken between the 12<sup>th</sup> December 2018 and 8<sup>th</sup> February 2019, in response to Minerals Technical Advice Note 1 Aggregates which places a requirement to maintain adequate reserves for the Plan period. Whilst there is currently an adequate supply (in combination with Ceredigion and Pembrokeshire), the Regional Technical Statement notes a potential shortfall in provision of sand and gravel resources (over a 15 year period).
- 4.5.2 In seeking to address the above, the 'call for sand and gravel sites' resulted in two submissions. Both focused on sites with existing extant planning permissions as follows:
  - Llwynjack farm, Llandovery respondent C.J. Lewis
  - Cwmgwyn Farm, Llandovery respondent D.A. Lewis

#### 4.6 Call for Gypsy and Traveller Sites

4.6.1 The call for Gypsy and Traveller Sites was undertaken between the 28<sup>th</sup> January and the 8<sup>th</sup> April 2019. A total of 9 sites were submitted for consideration, all within the Llanelli area. The findings of these sites were considered in detail and were informed against the provisions of the site assessment methodology which was published in conjunction with the call for sites exercise.

# 4.7 Consultation on Sites Submitted on the 'Register of Candidate Sites'

- 4.7.1 In conjunction with the consultation on the Draft Preferred Strategy, a further consultation was undertaken on those sites submitted as part of the 'Call for Candidate Sites' held in 2018. This provided interested parties with an opportunity to lodge their views on the 926 candidate sites submitted.
- 4.7.2 As part of this process a significant number of representations were submitted amounting to circa 4,000. These were utilised where appropriate to inform the consideration and selection of sites for inclusion within the 1<sup>st</sup> Deposit LDP and subsequently in the preparation of the 2<sup>nd</sup> Deposit LDP. Responses received as part of the consultation on the Register of Candidate Sites were not subject to the democratic reporting process.

# 4.8 Pre-Deposit Preferred Strategy

4.8.1 The Revised LDP Preferred Strategy, together with its accompanying supporting documents, was published for formal consultation between the 12<sup>th</sup> December 2018 and the 8<sup>th</sup> February 2019. Letters and emails were sent to all consultees identified within the Delivery Agreement and those within the consultation database/mailing list.

- 4.8.2 The following documentation was made available for public inspection:
  - Draft Pre-Deposit Preferred Strategy
  - Draft Pre-Deposit Preferred Strategy Easy Read Version
  - Habitat Regulations Assessment Screening Report
  - Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Initial Report: Non-Technical Summary
  - Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Initial Report
  - Candidate Site Register Initial Assessment
  - Carmarthenshire LDP Review Report
  - Equality Impact Assessment Preferred Strategy
  - Tests of Soundness: Self-Assessment Preferred Strategy
- 4.8.3 Copies of the above documents were made available on the Council's LDP webpages and at the following deposit locations:
  - Customer Service Centre, 3 Spilman Street, Carmarthen
  - The Hwb, Quay Street, Ammanford
  - The Hwb, Stepney Street, Llanelli
  - Planning Service Office, Municipal Offices, Llandeilo, and
  - All public libraries during normal opening hours
- 4.8.4 This consultation also included an opportunity for comments to be submitted in respect of the register of candidate sites. The Review Report in respect of the current adopted LDP was also published for formal consultation in conjunction with the Draft Pre-deposit Preferred Strategy.
- 4.8.5 Copies of the responses were duly reported to County Council, together with updates to the strategic policies resulting from the Initial SA/SEA (ensuring positive iteration) on the 15<sup>th</sup> of May 2019. Copies of the responses together with the recommendations as endorsed by Council are available to view online.
- 4.8.6 In total some 346 representations were submitted across the range of consultation documents. These came from a range of bodies, organisations and individuals and are broken down as follows:
  - Draft Preferred Strategy 269 Representations
  - Sustainability Appraisal/Strategic Environmental Assessment Scoping Report 2 Representations and Initial Report – 11 Representations
  - Habitat Regulations Assessment Screening Report 62 Representations
  - Carmarthenshire Local Development Plan Review Report 0 Representations
  - Call for Sand and Gravel Sites 2 Representations
- 4.8.7 The relevant responses received during the Pre-Deposit Consultation (Preferred Strategy) identified a number of issues which the Council considered in detail and sought to address or provide clarification where necessary.
- 4.8.8 There were no representations received which the Council considered would significantly undermine the strategic approach set out within the Preferred Strategy. There were however a number which required specific amendments in relation to the

Revised LDP as it progressed through to future stages. Other representations required further evidencing and subsequent inclusion as part of the content, policies and proposals of the Deposit LDP.

## 4.9 Preferred Strategy - Key Themes from Representations

- 4.9.1 As noted above, 269 representations were submitted in respect of the Draft Preferred Strategy. These submissions were from a wide range of respondents and offered constructive input for the Revised LDP as it progressed through its preparatory process.
- 4.9.2 Many of the comments received reflect that the preparation of the development plan is iterative in nature, with its content and the evidence base developing in response to changes in approach and guidance. In this respect, as the preparation of the revised LDP progresses toward the Deposit Plan, further detail will emerge and will be incorporated. Notable reference was made to the absence of the following evidence available at the time of the Draft Preferred Strategy. In this regard, the Welsh Government made reference to the need to strengthen the following:
  - Renewable Energy Assessment.
  - Local Housing Market Assessment.
  - Updated Gypsy and Traveller Accommodation Needs Assessment.
  - Welsh Language Impact.
  - Housing Viability Evidence.
  - Employment Growth and Economic Activity Evidence.
- 4.9.3 The importance of collaborative working across organisations also emerged as a consistent theme within the representations, including the need to work with landowners and developers to bring sites forward and to produce the necessary evidence to support their inclusion in the Plan.
- 4.9.4 Key themes to emerge relate back to elements of evidence in relation to the distribution of growth including scale, type and location of development and how they relate to then outstanding evidence in terms of the Housing Market Assessment and the Rural Needs Surveys. In this respect, comments were received supporting the level of growth, whilst others challenged it with a view to raising or lowering the requirement.
- 4.9.5 Where representations relate to objections to the Preferred Strategy, these are predominately focused around the following themes:
  - The level of growth identified within the Plan and its distribution to sustainable locations and settlements.
  - Impact on the Welsh language The consequence of the level/distribution of housing growth proposed on the Welsh language.
  - The Plan should rectify the current LDP's failure to deliver as anticipated.
  - Lack of clarity around the 6% flexibility identified within the Preferred Strategy.
  - Locational relationship between homes and jobs Greater articulation needed on the link between the plan's housing requirement and its target for jobs.
  - Reference to Strategic Sites not coming forward.

- The lack of strategic focus on the contribution of Renewable Energy to the Plan was referenced. Indeed the issue was raised specifically by the Welsh Government in their response.
- The potential failure to identify the level of need for Gypsy and Traveller Sites and allocate a site or sites in the Deposit Plan to meet any identified need.
- 4.9.6 Some objectors have used the consultation as an opportunity to make comments in relation to specific sites or to promote opportunities for growth in specific settlements. It is noted that the vast majority of comments did not raise matters or issues that resulted in a change to the Preferred Strategy. Where points were accepted, these in the main related to wording changes in policies rather than more fundamental amendments to the Plan. Please see Appendix 3a for the representations received and the officer comments and recommendations.

# 5. First Deposit Revised LDP

- The 1<sup>st</sup> Deposit Revised LDP, together with its accompanying supporting documents, was published for formal consultation between the 29 January 2020 and the 27 March 2020. This was supplemented by a further consultation period from the 11 September 2020 to 2 October 2020 reflecting the impact of the Covid Pandemic and the associated lockdown on the ability of the public and interested parties to access documentation contained within public buildings.
- 5.2 Letters and emails were sent to all consultees identified within the DA and those within the consultation database/mailing list.
- 5.3 The following documentation was made available for public inspection in accordance with the content of the DA.
  - [First] Deposit Revised LDP
  - Sustainability Appraisal / Strategic Environmental Assessment
  - Habitats Regulations Assessment
  - Delivery Agreement;
  - Tests of Soundness Self-Assessment
  - Initial Consultation Report
  - Equalities Impact Assessment
  - Candidate Sites Register and Initial Assessment
  - Preferred Strategy
  - Topic Papers
  - Evidence and supporting documentation
- As part of the consultation a series of drop-in sessions were held across Carmarthenshire. The events provided an opportunity for groups, organisations, interested parties and members of the public to discuss and learn more about the LDP from the Officers from the Forward Planning Section in attendance. The events were held at the seven venues listed in paragraph 3.2.5.
- 5.5 As part of the consultation a significant number of responses were received from a range of bodies, organisations, companies, communities and interested parties, with comments covering nearly all aspects of the Plan's content.

- 5.6 In total 1,508 responses were received in respect of the 1<sup>st</sup> Deposit Plan with 1,174 objecting to its content. Of the total number of representations circa 1,000 were in response to the inclusion or non-inclusion of a site within the Plan, whilst the remainder related to comments on the content of the written statement and matters of policy.
- 5.7 Key themes to emerge as part of the consultation were set out in the report to the meeting of County Council on the 13<sup>th</sup> January 2021. These key themes and the report, including representations and the proposed Focused Changes in can be viewed via the following link: <u>Agenda for County Council on Wednesday, 13th January, 2021, 10.00 am (gov.wales)</u>
- 5.8 Reference is made to the Covid–19 Assessment prepared in conjunction with the Revised Delivery Agreement (as presented to County Council on the 22<sup>nd</sup> October 2020).

# 6. Second Deposit Revised LDP

- 6.1 Since publication of the 1<sup>st</sup> Deposit LDP, there have been a number of events outside the Council's control that has required the content of the Plan to be further considered and revised. Foremost amongst these was in response to the findings of NRW's Compliance Assessment of Welsh River Special Areas of Conservation Against Phosphorus Targets, initiated through a recommendation made by the JNCC to adopt tighter targets of associated nutrient pollution. Following this, Council agreed to the Revised Delivery Agreement timetable and allowed the preparation of a 2nd Deposit rLDP. This provided time for essential evidence to be gathered and mitigation options to be developed to address the phosphates issue. It has also allowed for consideration of Covid-19, decarbonisation agenda, nature emergency, TAN15, and Future Wales: The National Plan 2040.
- As a result, the Council resolved to prepare a 2<sup>nd</sup> Deposit Revised LDP at the meeting of County Council on 9<sup>th</sup> March 2022. Also considered at the meeting, was the Position Paper on Phosphates where it was resolved to establish the Afon Tywi Nutrient Management Board (NMB), develop its terms of reference and prepare a nutrient Management Plan. A link to the Council Report is contained within Appendix 7.
- 6.3 The County Council resolved to approve the content of the Draft 2<sup>nd</sup> Deposit Revised LDP for formal consultation on 7<sup>th</sup> December 2022.
- 6.4 The 2<sup>nd</sup> Deposit Revised LDP, together with its accompanying supporting documents, was published for formal consultation between the 17<sup>th</sup> February and 14<sup>th</sup> April 2023.
- 6.5 The documents placed on Deposit and available for public consultation were:
  - 2<sup>nd</sup> Deposit Local Development Plan (comprising of the Written Statement and Proposal and Inset Maps)
  - Integrated Sustainability Appraisal Report 2<sup>nd</sup> Deposit RLDP
  - Habitats Regulation Assessment Report (January 2020)

- Habitats Regulation Assessment Addendum (2<sup>nd</sup> Deposit RLDP)
- 6.6 A number of background documents and evidence were also published.
- 6.7 As part of the consultation, a series of drop-in sessions were held across Carmarthenshire. The events provided an opportunity for groups, organisations, interested parties and members of the public to discuss and learn more about the LDP from the Officers from the Forward Planning Section in attendance. The events were held at the seven venues listed in paragraph 3.2.5.
- 6.8 As part of the consultation a significant number of responses were received from a range of bodies, organisations, companies, communities and interested parties, with comments covering nearly all aspects of the Plan's content.
- 6.9 1334 responses were received to the 2<sup>nd</sup> Deposit Plan consultation, with 979 objecting to its content, and 306 of support, and 49 have been withdrawn. The table below provides an overview of the number of representations received against each of the sections and policies in the LDP (the numbers include withdrawn representations). The representations are contained in submission/examination documents and can be viewed via the online portal system.

Section		Representations		
	Total	Object	Support	
2. What is the Deposit Plan				
Integrated Sustainability Appraisal	1	1	0	
3. Influences on the Plan	2	2	0	
4. Carmarthenshire – Strategic Context	4	4	0	
5. Issues Identification	5	3	2	
6. A Vision for "One Carmarthenshire"	2	1	1	
7. Strategic Objectives	7	4	3	
8. Strategic Growth & Spatial Options	13	9	4	
9. A New Strategy	8	4	4	
10. The Clusters	1	0	1	
11. Policies	12	12	0	
SP1: Strategic Growth	11	9	2	
SG1: Regeneration & Mixed Use Sites	23	8	15	
SG2: Reserve Sites	6	5	1	
SG3: Pembrey Peninsula	6	0	6	
SP2: Retail and Town Centres	4	2	2	
SP3: Sustainable Distribution	14	5	9	
SD1: Development Limits	159	128	31	
SP4: A Sustainable Approach	20	18	2	
HOM1: Housing Allocations	544	425	119	
HOM2: Housing within Development Limits	1	0	1	
HOM3: Homes in Rural Villages	30	16	14	
HOM4: Homes in Non-Defined Rural Settlements	14	9	5	
HOM5: Conversion or Subdivision of Existing	1	0	1	
Dwellings				
HOM7: Renovation of Derelict or Abandoned	5	4	1	
Dwelings				
HOM8: Residential Caravans	1	0	1	
SP5: Affordable Homes Strategy	7	7	0	

Section	Repre	sentatio	ns
	Total		Support
AHOM1: Provision of Affordable Homes	4	3	1
AHOM2: Affordable Housing – Exceptions Sites	5	3	2
SP6: Strategic Sites	1	0	1
SP7: Employment and the Economy	3	2	1
EME1: Employment – Safeguarding of	4	3	1
Employment Sites			
EME3: Employment Proposals on Allocated Sites	17	14	3
EME4: Employment Proposals on Non-Allocated	3	3	0
Sites			
SP8: Welsh Language and Culture	14	10	4
WL1: Welsh Language and New Developments	7	5	2
SP9: Infrastructure	1	0	1
INF1: Planning Obligations	3	2	1
INF2: Healthy Communities	1	1	0
INF3: Broadband & Telecommunications	1	1	0
INF4: Llanelli Wastewater Treatment Works	5	0	5
Catchment Surface Water Removal			
INF5: Rural Allocation outside Public Sewerage	2	1	1
System Catchments			
SP10: Gypsy and Traveller Provision	51	47	4
SP11: The Visitor Economy	14	13	1
VE1: Visitor Attractions and Facilities	1	0	1
VE2: Holiday Accommodation	5	4	1
VE3: Touring Caravan, Camping and Non-	5	3	2
Permanent Alternative Camping Accommodation			
VE4: Static Caravans and Chalet Sites and	5	3	2
Permanent Alternative Camping Accommodation			
SP12: Placemaking and Sustainable Places	10	6	4
PSD1: Effective Design Solutions: Sustainability	8	3	5
and Placemaking			
PSD3: Green and Blue Infrastructure Network	7	2	5
PSD4: Green and Blue Infrastructure – Trees,	9	1	8
Woodlands and Hedgerows			
PSD5: Development and the Circular Economy	2	1	1
PSD7: Protection of Open Space	30	29	1
PSD8: Provision of New Open Space	2	2	0
PSD9: Advertisements	1	0	1
PSD12: Light and Air Pollution	7	5	2
SP13: Rural Development	12	12	0
RD1: Replacement Dwellings in the Open	1	1	0
Countryside			
RD2: Conversion and Re-Use of Rural Buildings	4	4	0
for Residential Use			
RD3: Farm Diversification	4	4	0
RD4: Conversion and Re-Use of Rural Buildings	1	1	0
for Non-residential Use			
SP14: Maintaining and Enhancing the Natural	6	1	5
Environment			
NE3: Corridors, Networks and Features of	2	1	1
Distinctiveness			

Section	Repre	esentatio	ns
	Total		Support
NE4: Development within the Caeau Mynydd	3	1	2
Mawr SPG Area			
NE5: Coastal Management	3	0	3
NE6: Coastal Development	1	0	1
NE7: Coastal Change Management Area	5	2	3
SP15: Protection and Enhancement of the Built	4	2	2
and Historic Environment			
BHE1: Listed Buildings and Conservation Areas	2	1	1
BHE2: Landscape Character	55	47	8
SP16: Climate Change	12	6	6
CCH1: Renewable Energy within Pre-Assessed	6	4	2
Areas and Local Search Areas			
CCH2: Renewable Energy Outside Pre-	11	7	4
Assessed Areas and Local Search Areas			
CCH3: Electric Vehicle Charging Points	8	7	1
CCH4: Water Quality and Protection of Water	7	4	3
Resources			
CCH5: Flood Risk Management and Avoidance	2	1	1
CCH6: Renewable and Low Carbon Energy in	3	3	0
New Developments			
CCH7: Climate Change – Forest, Woodland and	7	5	2
Tree Planting			
SP17: Transport and Accessibility	6	6	0
TRA1: Transport and Highways Infrastructural	3	1	2
Improvements			
TRA2: Active Travel	3	3	0
TRA4: Redundant Rail Corridors	3	3	0
SP18: Mineral Resources	13	6	7
MR1: Mineral Proposals	2	1	1
MR2: Mineral Buffer Zones	2	2	0
MR3: Mineral Safeguarding Areas	2	2	0
SP19: Sustainable Waste Management	2	1	1
WM2: Landfill Proposals	1	1	0
WM3: Agricultural Land – Disposal of Inert Waste	2	2	0
12. Monitoring and Implementation		0	2
13. Glossary		0	1
Appendix 3 – Supplementary Planning Guidance		0	1
Appendix 4 – Minerals Sites		1	0
Appendix 7 – Housing Trajectory		2	0

6.10 Appendix 9 summarises the key themes to emerge as part of the consultation into the 2<sup>nd</sup> Deposit Plan. Appendix 12 contains a summary and response to the representations received to the 2<sup>nd</sup> Deposit.

# 7. Integrated Sustainability Appraisal & Habitats Regulations Assessment

- 7.1 The Plan has been subject to an Integrated Sustainability Appraisal (ISA) and Habitats Regulations Assessment (HRA) in order to meet its statutory requirements. The purpose of this is to promote sustainable development by identifying any significant economic, environmental, and social impacts, and suggesting measures to maximise positive and mitigate negative effects, when relevant. The ISA consists of a combined 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 further contains other considerations related to the environment including NRW's Area Statement and the Section 6 Duty. The HRA is a standalone document and assesses whether the plan it would likely have a significant effect on the National Site Network. Throughout their preparation. representations have been received from a number of stakeholders to help inform this process. While many have been subsequently addressed and embedded within the respective documents, all representation received on the ISA and HRA can be found in the following appendices:
  - Appendix 4: HRA Screening Report responses.
  - Appendix 5: SA/SEA Scoping Report & Initial Report responses.
  - Appendix 13: Responses received to the ISA/HRA accompanying the 2<sup>nd</sup> Deposit LDP.
  - Appendix 14: Responses received to Focus Change consultation on the ISA/HRA (February 2024)
- 7.2 It will be necessary to produce additional ISA and HRA documentation following the examination process to ensure that any further changes to the plan are appropriately screened, and the requirements of the relevant regulations are met.