

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

SCHEDULE OF MATTERS, ISSUES AND QUESTIONS

Matter 4: Prosperous People and Places – Employment, the Visitor Economy and Infrastructure

Issue - Is the economic strategy coherent and based on a clear and robust preparation process? Will it address the Issues and Strategic Objectives effectively and efficiently? Are the policies realistic and appropriate in the light of relevant alternatives and are they based on robust and credible evidence?

Employment

- 1. Is the Housing and Economic Growth Report based on robust and credible evidence? And are the findings sufficient to inform the Plan's economic strategy?**

The Housing and Economic Growth Report sought to undertake a comprehensive assessment of housing and economic growth options for Carmarthenshire and was completed in November 2022 (CSD34). The Report purposely sought to build from the existing evidence, which included demographic forecasting from Edge Analytics, and the Two Counties Economic Study for Pembrokeshire and Carmarthenshire (update 2021) (CSD42). The Report incorporated the latest available evidence relating to demographics, the housing market and the local economy, exploring how the population of Carmarthenshire could change if recent trends continue, estimating the associated levels of housing need and benchmarking the job growth that could be supported in such scenarios.

The assessment undertaken within the Report has been carried out in the context of the Welsh Government's Development Plans Manual which emphasises the importance of balancing housing and job growth to reduce the need for commuting.

The Report considers the potential for further economic growth in Carmarthenshire over the new plan period to 2033 using three baseline forecasts. This suggests that between 149 and 545 jobs could be created each year. The forecast from Experian, anticipating 354 jobs per annum from 2020 onwards, is the preferred option in the Report following consideration of historic trend data, sectoral breakdowns and earlier evidence-based studies.

The resulting conclusions have informed the scale and distribution of employment need within the County, together with most appropriate land that could meet that need over the plan period, and in accordance with Planning Policy Wales and Technical Advice Note 23: economic development.

2. What are the key drivers for change in Carmarthenshire's employment market? And how has the Plan addressed these considerations?

Within the County there are key economic drivers including the investments at Cross Hands in relation to the food park and the Cross Hands East employment site. The creation of the Swansea Bay City Region brought together a wide, diverse, and contrasting area with the focus on driving investment and job creation opportunities. The signing of the £1.24 billion city deal in 2017 has resulted in progress in delivering the associated projects - Yr Egin Creative Cluster in Carmarthen, the Llanelli Well-being and Life Sciences project at Pentre Awel, as well as a third project relating to a skills and talent initiative supporting skills development within the City Region.

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

Consequently, Strategic Policy SP7: Employment and the Economy sets the framework to enable delivery of a balanced level of employment land to accommodate the new jobs and identified through the above studies. This is considered an unrestrictive and positive approach to ensure that a range and mix of site types are available across the County up until 2033, providing plentiful scope for continued investment without frustrating housing supply.

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

3. How many new jobs are estimated to be created as a consequence of the Plan's economic strategy? And in what sectors?

In terms of sectors Carmarthenshire's economy is fairly diverse. The sectoral base is discussed in detail in the Housing and Economic Growth Report, but in broad terms, there is a relatively large presence in manufacturing (especially in the east of the County, around Llanelli), food production (both in terms of primary agricultural production and food processing) and the visitor economy. There is also a growing creative sector, which has benefited from recent investment through the Swansea Bay City Deal, and an important concentration of sub-regional educational and public service assets around Carmarthen. It is also important to note that the local authority have done some pre-feasibility assessments of a range of low carbon energy projects and there is scope on certain sites for wind and solar, energy from waste, ev charging, resource recovery, together with related industrial uses with a focus on the circular economy and benefits from on site power generation.

Having reviewed economic performance over the current plan period, the Housing and Economic Growth Report considers the potential for further economic growth in Carmarthenshire over the new plan period to 2033. Three baseline forecasts, from each of the leading forecasting houses, have been introduced which suggest that between 149 and 545 jobs could be created each year. The forecast from Experian, anticipating **354 jobs per annum from 2020 onwards, has been preferred** in the Report, following consideration of historic trend data, sectoral breakdowns and earlier evidence-based studies.

Comparisons in anticipated growth across the major sector groups is set out in the Housing and Economic Growth Report and so will not be repeated here. However, in general terms, growth is anticipated in public services, business services, accommodation and food service, as well as the construction industry. Whilst there is a more negative picture for manufacturing, agriculture and retail and wholesale.

Whilst the forecast from Experian is preferred, the Housing and Economic Growth Report nevertheless considers investment and ambition, accounting for the strategic environment for growth in Carmarthenshire. Factors such as the Council's Strategic Regeneration Plan *Transformations*, Cabinet Vision Statement (2022), as well as the Swansea Bay City Deal and South West Wales Regional Economic Delivery Plan, will not have been taken into account within the three 'top-down' econometric forecasts cited above, so are important to consider in the development of an alternative investment led growth scenario. The Report estimates that some 674 jobs per annum could potentially be created in such an investment-led growth scenario.

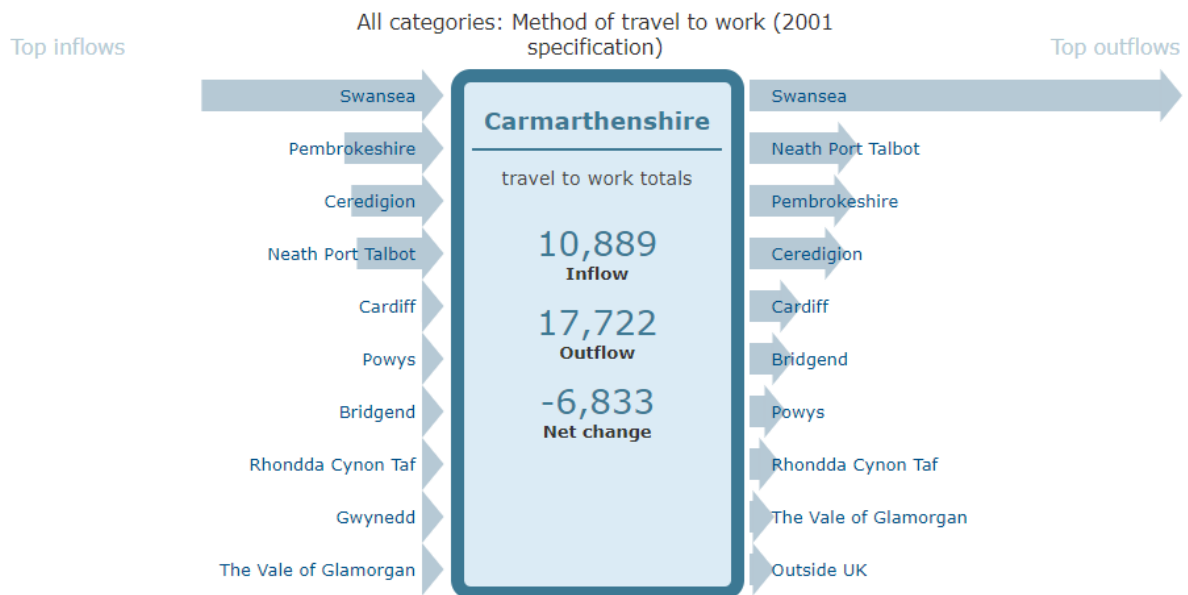
It is also important to note here that the local authority have a range of incentives for businesses including Property Development Grants to bridge the gap between cost of construction and end value, Rural Enterprise Fund based on job

creation, Business Start up and Growth Grants, various Town Centre Grants and Loans, and Renewable Energy Funds. Future incentives will depend on emerging policies and finance from both UK and Welsh Government.

4. What is the cross-border employment relationship? What proportion of the existing jobs within Carmarthenshire are filled by employees from outside the County?

The issue of Commuting has been considered in the Housing and Economic Growth Report. It is inevitable that a proportion of people will commute out of Carmarthenshire, and that a proportion of the jobs within the County will be occupied by workers from outside. In terms of numbers, the difference between the level of employment in an area and the size of the resident workforce (i.e. residents in employment) can be used to infer a 'commuting ratio'.

The Housing and Economic Growth Report assessed the patterns of commuting from the 2011 Census (the most relevant data at the time of publication), the number of resident workers in Carmarthenshire was approximately 81,402, with the number of people employed in the area at 74,569. This results in a commuting ratio of 1.09, indicating a net out-commute. The actual inflow/outflow numbers are shown in the Nomis figure below. Consequently, of the 74,569 jobs within the County, 10,889 are taken up by workers from outside the County.



Commuting totals (all categories: method of travel to work (2001 specification)) for Carmarthenshire:

- Inflow: **10,889** person(s) commute into Carmarthenshire from other local authorities in the UK.
- Outflow: **17,722** person(s) commute out of Carmarthenshire to other local authorities in the UK or abroad.
- Net change: Overall, commuting results in a population decrease of **6,833** in Carmarthenshire.

Source: Nomis – Official Census and Labour Market Statistics

5. How many of Carmarthenshire's residents travel to work outside the County? And how has this movement been accounted for in its employment forecasts?

By referring to the nomis figure in the response to question 4 above, we can see that in 2001 17,722 Carmarthenshire residents commuted out of the County to work, not surprisingly the highest proportion of these heading to the economic offer provided by the City and County of Swansea.

The assessment in the Housing and Economic Growth Report has been undertaken in the context of the Welsh Government's Development Plans Manual 3 which emphasises the importance of balancing housing and job growth to reduce the need for commuting.

The Housing and Economic Growth Report assumes that commuting continues at the rate recorded by the last reported Census in 2011, when there were 1.09 resident workers per job in Carmarthenshire and thus a net out-commute. While reflective of an increasingly dated point in time, it is of note that an identical ratio was also recorded by the 2001 Census (see Nomis figure above). This suggests that this is a longstanding trend that can thus be reasonably assumed to continue as a starting point, even if it takes no account of any specific policy-led interventions to adjust the relationship between jobs and labour in the County. This commuting ratio has been applied in the Report and fixed throughout the forecast period in all scenarios.

To counter the traditional net outflow of commuters from Carmarthenshire, a positive land response is required through providing enough land for future employment development – enough to cater for the needs of the creation of circa 354 jobs per annum as envisaged by the preferred scenario in the Housing and Economic Growth Report. Whilst this underlying projection promotes sustainable forms of growth that will help minimise the need for out-commuting, the Report does explore the potential for a higher level of job growth whereby as many as 674 jobs per annum could be created if various known and potential investments are made.

6. Are the sites allocated under Policy SP6 based on robust and credible evidence? And should they be subject to specific policies which provide a clear framework for development?

PPW12 stresses that careful consideration should be given to strategic employment sites to ensure that they provide a differentiated offer across the region [as well as the County level]. The two sites allocated under Policy SP6, namely Pentre Awel and Yr Egin, are important strategic sites, both at the local as well as regional level. Indeed, the future economic development of the County, particularly in respect of these two sites should be viewed in the wider

context of the Swansea Bay City Deal under which these two projects form important elements.

In terms of Pentre Awel, outline planning permission was granted in 2019 for the Llanelli Wellness and Life Science Village, including community health hub (institute of Life Science, wellness education centre and clinical delivery centre); D1 Non-residential institution, B1 Business Research and development, and Reserved Matters Permission was granted for access, appearance, landscaping layout and scale for Phase 1 of the scheme in June 2022. Numerous discharges of conditions have subsequently been made and development of phase 1 of the site is underway.

Pentre Awel is allocated in the Revised LDP as a strategic site under Policy SP6, and, due to the advanced stage of progress on the site in terms of planning permission (and associated masterplans), it is not deemed necessary to provide a specific policy within the Plan to cover this site.

In terms of Yr Egin, the site benefits from planning permission and has already been developed and is occupied. However, unlike Pentre Awel, Yr Egin is covered under employment policy EME3 as an allocated employment site by nature of its B2 use class. Consequently, it is not deemed necessary to provide a specific policy within the Plan to cover this site.

7. Is the level of employment land provision identified in Policy SP7 appropriate?

a) How has the overall figure of 71.21 hectares been derived? Is the level of employment land provision fully justified and supported by robust and credible evidence?

Strategic Policy SP7: Employment and the Economy sets the framework to enable delivery of a balanced level of employment land to accommodate the new jobs and identified need through the *Two County Economic Study for Pembrokeshire and Carmarthenshire and Housing and Economic Growth Report*. These considered an unrestrictive and positive approach to ensure that a range and mix of site types are available across the County up until 2033, providing plentiful scope for continued investment without frustrating housing supply.

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

A number of factors need to be borne in mind when considering the 71.21ha allocation figure. TAN 23 considers that 'land provision targets may be higher than anticipated demand, to allow for the chance that the assessments are too low and to ensure that no opportunities are missed.' The Practice Guidance to the TAN (August 2015) considers that, where justified, land provision targets maybe higher than anticipated demand, to allow for the chance that the assessments are too low and to ensure that no opportunities are missed.

In acknowledging the importance of not solely relying on employment forecasts when identifying a portfolio of employment land, the *Two County Study* emphasises the demand and confidence of indigenous businesses to remain and grow, and a desire by stakeholders to preserve locational advantages and strategic assets for future growth. Coupled with these findings, the economic consequences of the projected increase in job numbers set out in the Housing and Economic Growth Study is considered sufficient for the Revised LDP and will ensure the local economy is not constrained. It is worth emphasising again here the range of incentives offered by the local authority for businesses to stimulate private sector investment – refer to Q.3 above.

Furthermore, many of the proposed sites are strategic in nature, have corporate backing and are seen as vital to the anticipated economic growth of the County. Some of the sites already benefit from planning permissions and / or masterplans.

b) Does Policy EME 3 clearly differentiate between allocated and committed sites? Are the sites realistic and economically viable? And are they free from significant constraint and deliverable over the Plan period?

No, the differentiation between allocated and committed sites is not set out for the individual employment allocations listed in Policy EME3. Table 6 however does set out the level of allocations that are committed in each Tier. At the time of Deposit, 17.29ha of sites allocated were commitments, and the remaining 53.92ha were not commitments. Differentiating between allocated and committed sites has the result of dating the plan at a particular moment in time. Planning permissions on some sites may lapse, whilst other sites could gain permission, in a short timeframe. Such commitments are monitored on a yearly basis and published in the Annual Monitoring Report (AMR).

A detailed site proforma has been produced for each allocation, and some of the larger sites have additional Statements of Evidence. These pieces of work set out the economic viability and deliverability of the sites together with information concerning potential constraints and how these could be overcome.

c) Is the hierarchy of employment sites appropriate and consistent with the requirements of national planning policy?

PPW12 stresses that Planning authorities should support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level, and that development plans should identify employment land requirements, and allocate an appropriate mix of sites to meet need.

The importance of the two strategic sites identified under Policy SP6, has already been covered in the answer to question 6 above. Whilst the strategic focus is associated with the Swansea Bay City Deal, the Revised LDP also provides a range of sites and opportunities for potential inward investment and relocations. This includes potential sites for larger employers, as well as sites to accommodate new smaller scale and start-up business uses within the policy framework. Policy SP7 sets out the provision of 71.21ha of employment land - the individual sites being identified under Policy EME3. **NB** the 71.21ha includes the strategic site of Yr Egin, but not the strategic site of Pentre Awel (as the latter is a mixed-use site and only includes some B class uses) – see also the answer to e) below.

In terms of a hierarchy, generally larger sites have been allocated within the three Principal Centres of Llanelli, Ammanford/Cross Hands and Carmarthen, in accordance with the Plan's Spatial Strategy. However, more medium to small sized sites have been allocated in the other settlement Tiers to enable opportunities for employment uses in appropriate locations across the County. Furthermore, in establishing the hierarchy of allocations, regard has also been had to a range of considerations to ensure that the level of land provision is reflective of not only a range of deliverable sites but also that they are based upon a robust understanding of their character and site areas. This is all in accordance with PPW12 which advises that planning authorities should aim to co-ordinate development with all forms of infrastructure provision such as transport and utilities and should align jobs and services with housing and sustainable transport infrastructure, to reduce the need for travel, and dependency on travel by car.

d) What is the Plan's strategy for the distribution of employment land? Does it have regard to the requirements of Future Wales – The National Plan and other regeneration initiatives?

Future Wales supports the sustainable location of economic land uses. It stresses the importance of cross border relationships between local authorities and establishes the concept of national and regional growth areas which will be the main focus for growth and investment in each of the regions in Wales. Carmarthenshire forms part of the South West region, where Swansea Bay and Llanelli (National Growth Area) will be the main focus for growth and investment, and where Carmarthen and the four Pembrokeshire Haven towns (Regional Growth Area) will be a focus for managed growth, reflecting their sub-regional

functions and strong links to the National Growth Area of Swansea Bay and Llanelli.

Accordingly, the Spatial Strategy of the Revised LDP recognises the national and regional growth areas as being the focus for strategic economic and housing growth and it identifies a settlement hierarchy, with the distribution of growth being focussed upon sustainable principles. 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 the major proportion of the anticipated growth, smaller opportunities (sites) have also been designated in other areas within the County.

The emphasis on the Principal Centres not only reflects their sustainability credentials but also their historic legacy. The distribution of employment land is also well-aligned with the sustainable locations within the County which are accessible by public transport or active travel routes which minimise the need for travel.

e) Are all the sites allocated in Policies SP7 and EME3 intended to be developed for B1, B2 and B8 purposes only? If not, should the policies be amended to make clear the other intended / potential use(s)?

In regard to Policy EME3, the intended use of the sites allocated is for B1, B2 and B8 employment purposes. The Council considers that this is clearly stated in the supporting text to the Policy (para.11.160) and does not need amending. However, it should be stressed that the supporting text in paras. 11.161 and 11.162 also includes a form of caveat whereby other employment and related ancillary non-B class uses will be permitted on allocated employment sites where the proposed development complements and enhances the site's role. The occasional non-B use on an otherwise traditional employment site has been experienced in recent years and is a sign of changing socio-economic conditions. Such provision in Policy EME3 will allow the local economy some diversity and flexibility. Examples in recent years have included a dental practice, an accountancy firm, and a Women's health & wellbeing centre on the Pibwrlwyd regeneration and mixed use site. There have also been enquiries for non-B class uses at Cross Hands East, and whilst the Joint Venture (JV) have stated that the site will predominantly be occupied by B1 uses there may be scope for ancillary developments.

In terms of Policy SP7, the 71.21 hectares stated here refer to the employment allocations, which are for B uses as stated above. However, the strategic site of Pentre Awel is also mentioned in this policy, and [as stated in the answer to question 6 above] this site only has a small proportion of B uses associated with it. This can be made clearer in the policy wording as an amendment.

f) Should details of the non-strategic employment allocations be included in the Plan?

The non-strategic employment allocations have been subject to a rigorous assessment process, and all have individual detailed site proformas which form part of the evidence base. Such details were not included within the employment Policies themselves as this would result in them being unnecessarily wordy and cumbersome. However, details of the non-strategic employment allocations could be included in a separate new appendix if deemed necessary.

8. Does Policy EME1 provide an appropriate framework for the safeguarding of employment sites?

Policy EME1 refers to sites identified for employment purposes in Policy SP7 for B employment uses, including:

- the 71.21ha of new allocations (listed individually in Policy EME3)
- the existing employment sites identified on the Proposals Map
- the strategic site of Pentre Awel – **NB** the amendment to the wording of policy SP7 referred to in the answer to Q.7 (e) above will clarify that not all the Pentre Awel development will be B uses.

It is considered that the policy provides an appropriate framework for the safeguarding of the employment sites and that any proposals that would result in their loss will need to demonstrate that the 6 exceptions criteria set out in the policy can be met.

The Council considers it may be appropriate in the interests of clarity to omit the word 'existing' from the 1st sentence of para. 11.153. The policy relates to new allocations as well as existing sites.

9. What is the purpose of Policy EME2? Does it apply to development in rural and urban areas?

Existing employment enterprises (generally these are identified on the LDP Proposals Map as existing employment sites) will continue to provide a valuable source of employment across the county and policy EME2 recognises this fact by being proactive in enabling existing businesses to expand.

The Employment Land Reviews, generally undertaken on an annual basis, have highlighted the fact that there is constant turnover (albeit at a small scale) of new businesses on existing employment sites; sometimes this can be the change of business owner in a premises, or sometimes it can be the extension of an existing building to accommodate the expansion of business, or the creation of a new ancillary car park to accommodate additional employees, for example. This policy is to cater for such circumstances and to prevent the sterilisation of employment land and the potential curtailing of employment opportunities.

It is acknowledged however that the policy is not clear as to whether it applies to development in both rural as well as urban areas. We agree that the policy will be re-worded to emphasise that it applies to both.

10. Is the approach taken in Policy EME4 to employment development on non-allocated sites within and outside development limits, clearly expressed, sufficiently flexible to respond to changing circumstances, and consistent with national planning policy?

Whilst it is the primary aim of the employment policies to direct new employment to the 71.21ha of employment allocations identified in Policy EME3, it is acknowledged that the economic market can dictate in some instances and that sometimes proposals can come forward on sites that are not allocated or existing employment sites. The annual Employment Land Reviews have identified each year that such proposals have come forward on these 'windfall' sites. Circumstances can change and Policy EME3 facilitates future development on those areas of land that could be very well suitable but where there is currently no prospect of inclusion due to various reasons such as landowner ambitions, infrastructure constraints, and land ownerships.

Policy EME4 therefore provides an element of flexibility whereby economic opportunities could be accommodated on non-allocated sites in both urban and rural areas. It is considered that the criteria of the policy is sufficiently robust and flexible to both enable opportunities for appropriate development, as well as protect neighbouring uses from detrimental impacts that might arise from the proposed operations.

Whilst the majority of anticipated proposals for such developments will be expected to come forward in the larger, sustainable growth areas, in line with PPW12, the policy also recognises the importance of small-scale enterprises in the County's more rural hinterland, and the crucial role that these can play to the rural economy. Indeed, the Council carried out the 10 Towns Study, which in turn fed into the *Moving Rural Carmarthenshire Forward* report, which looked into the importance of the local service centre towns throughout Carmarthenshire. Enabling small-scale growth in the rural hinterland is in accordance with *Future Wales* given the close linkages between these outlying areas with the regional growth area of Carmarthen.

Visitor Economy and Equestrian Related Development

11. How will the Plan maintain and enhance the County's tourism, culture and leisure offer?

Tourism is a key component of Carmarthenshire's economy. It is a major source of employment and revenue. It generates around £400 million - £500 million of revenue to the County's economy annually.

The County is home to a wide range of attractions, including Ffos Las Racecourse, the National Botanic Gardens and Pembrey Country Park. Carmarthenshire is the "cycling hub of Wales", with the Cycling Strategy capturing the Council's aspirations to be a national lead in the provision of cycling infrastructure events and development

SP11 sets the framework for a policy approach within the Revised LDP that is sufficiently responsive and flexible to market demand. In interpreting SP11, it should be noted that tourism related developments include new facilities, as well as extensions to existing facilities. Whilst strategic policy SP11 provides the overarching context, specific policies provide detail – see the answers to questions 12 & 13 below.

12. Will Policy VE1 provide an appropriate mechanism for the management of new visitor attractions and facilities in the County? And are the requirements of the policy clearly expressed?

Yes. This policy acknowledges the economic opportunities afforded by the tourism sector but also emphasises the importance of maintaining the social, economic and environmental integrity of the County. Consequently, whilst providing for the needs of visitor attractions and facilities (both new as well as extensions to existing sites), the policy also provides an appropriate mechanism that affords protection of the social, economic and environmental fabric of the County from any harm that may arise from the proposal.

The requirements of the policy are clearly set out through criteria, with those setting out proposals within or directly related to settlements being clearly differentiated from proposals in more rural (open countryside) locations; the latter requiring a sequential approach to be followed. The policy stresses the importance of proposals being appropriate to their location, and that they should preferably be accessible by various modes of transport.

13. Do Policies VE2, VE3 and VE4 provide an appropriate framework for the management of visitor accommodation in the County?

Yes. Policies VE2, VE3 and VE4 provide an appropriate framework for the management of visitor accommodation in the County in accordance with national

policy. The policies acknowledge the importance of the visitor economy in the County, and the benefits of a diverse accommodation offer in terms of providing a range and choice of places to stay ranging from hotels and guest houses to permanent and non-permanent camping accommodation.

Each policy deals with a separate form of visitor accommodation and is supported by a number of specific criteria that an individual proposal will need to satisfy. Policy VE2 relates to the variety of different types of permanent accommodation in the form of large high-quality hotels, to small bed & breakfasts. In the interests of sustainability, the policy recognises the need to locate new build proposals within or directly related to defined settlements. Where this is not possible, proposals will only be supported if they involve the re-use and adaptation of an existing building.

Both policies VE3 and VE4 respond to emerging trends within the sector and allow for the consideration of alternative luxury camping or glamping accommodation units, and static caravans and chalets. The main difference between the two policies relate to the level of permanence of the accommodation. Each policy contains a number of criteria that will need to be satisfied; the permanent proposals under VE4, which include static caravans and chalets, is more prohibitive in terms of locational and operational restrictions.

Collectively, it is considered that all 3 policies cater for the needs of all types visitor accommodation in the County, as well as ensuring adequate protection of the local highway network and landscape qualities.

14. Should the Gateway Resort and Garnant Golf Club be designated as a tourism facility?

No. The Plan does not identify tourism facilities on its Proposals Maps, unless they form part of an identified regeneration and mixed-use site. The policy framework set out within the revised LDP (refer to answers to questions 11-13 above) allows the potential development for tourism and the visitor economy where it is appropriately located. This includes both the expansion of existing facilities (such as Gateway Resort, Bynea and Garnant Golf Club) as well as proposals for new facilities.

15. Does Policy RD5 provide an appropriate framework for assessing proposals for new equestrian facilities?

Yes. Policy RD5 provides an appropriate framework for assessing proposals for new equestrian facilities and is based upon several criteria that will have to be met, relating to siting, intensity of use, suitable access, and ensuring that the development will not have an adverse effect upon the landscape or nature conservation interests. The policy applies to, and differentiates between, equestrian facilities associated with private domestic use as well as those for

commercial use. Para.11.402 in the Policy's supporting text highlights that commercial stables and ménages will be considered as rural businesses.

Infrastructure

16. Are the requirements of Policy INF3 for the provision of Broadband appropriate and consistent with national planning policy?

Yes, Planning Policy Wales Edition 12 mandates that new development proposals must include 'gigabit capable' broadband infrastructure from the outset. The Revised LDP makes this a requirement for all new developments. Additionally, it stipulates that major new developments must have high-speed and reliable broadband connections to the premises, while smaller developments should offer access to the best available high-speed connection and include additional ducting for future Fiber to the Premises (FTTP) or similar upgrades. Given the increasing reliance on broadband for daily life, connecting rural areas has become more crucial. The remoteness of some regions presents challenges for telecommunications companies in deploying modern networks. The Revised LDP ensures that new developments in these areas will have access to the best possible high-speed connection and will be equipped with infrastructure to facilitate future fibre upgrades when feasible. Consequently, the Plan addresses the need for broadband infrastructure and its enhancement or replacement.